

Appendix 2.

PART B – Equality Analysis Form

As a public authority we need to ensure that all our strategies, policies, service and functions, both current and proposed have given proper consideration to equality and diversity.

This form:

- Can be used to prompt discussions, ensure that due regard has been given and remove or minimise disadvantage for an individual or group with a protected characteristic
- Involves looking at what steps can be taken to advance and maximise equality as well as eliminate discrimination and negative consequences
- Should be completed before decisions are made, this will remove the need for remedial actions.

Note – An Initial Equality Screening Assessment (Part A) should be completed prior to this form.

When completing this form consider the Equality Act 2010 protected characteristics Age, Disability, Sex, Gender Reassignment, Race, Religion or Belief, Sexual Orientation, Civil Partnerships and Marriage, Pregnancy and Maternity and other socio-economic groups e.g. parents, single parents and guardians, carers, looked after children, unemployed and people on low incomes, ex-offenders, victims of domestic violence, homeless people etc. – see page 11 of Equality Screening and Analysis Guidance.

1. Title	
Equality Analysis title: Establishment of a Financial Abuse and Exploitation Service for Rotherham	
Date of Equality Analysis (EA): 12/10/22	
Directorate: ACH & PH	Service area: Housing Services
Lead Manager: Paul Elliott, Interim Head of Housing Operational Services	Contact number: 01709 822494
Is this a:	
<input type="checkbox"/> Strategy / Policy	<input checked="" type="checkbox"/> Service / Function
<input type="checkbox"/> Other	
If other, please specify	

2. Names of those involved in the Equality Analysis (Should include minimum of three people) - see page 7 of Equality Screening and Analysis Guidance

Name	Organisation	Role (eg service user, managers, service specialist)
Paul Elliott	RMBC	Manager
Sue Shelley	RMBC	Manager
Sally Morris-Shaw	RMBC	Manager
Asim Munir	RMBC	Tenant Involvement Co-ordinator

3. What is already known? - see page 10 of Equality Screening and Analysis Guidance

Aim/Scope (who the Policy/Service affects and intended outcomes if known)

This may include a group/s identified by a protected characteristic, other groups or stakeholder/s e.g. service users, employees, partners, members, suppliers etc.)

The project proposal is to establish a financial abuse and exploitation service offer for Rotherham. This will enhance and increase the service delivery to residents and complement that offered by Adult Safeguarding and Community Safety and Environmental Protection.

The project proposal has been developed as a consequence of the success of the West Yorkshire Joint Services work. West Yorkshire was established in 2016 and since that date has seen success in prosecuting perpetrators and returning stolen assets to individuals and to authorities who have not been paid agreed care costs.

The project will be funded from an already agreed revenue budget so no other service will be disadvantaged, and this will create additional capacity to respond to cases where financial exploitation or abuse are suspected.

What equality information is available? (Include any engagement undertaken)

- Joint Strategic Needs Assessment
- Indices of Multiple Deprivation
- Ward Profiles
- Local population demographic data
- RMBC Housing Register
- Intelligence from partners e.g. registered providers
- Profile of existing council tenants
- Census 2011
- Information received directly from other Council services identifying demand e.g. Adult Social Care, Children's Services.

Engagement will have been undertaken with Adult Safeguarding Board, Housing Involvement Panel, AIR Partnership and the Safer Rotherham Partnership. Some areas of Rotherham are affected by high economic and social deprivation. Rotherham is the 52nd most deprived district in England according to the Index of Multiple Deprivation 2015, which showed 19.5% of residents living in the 10% most deprived areas nationally.

Central Rotherham forms the main area of high deprivation although there are also pockets in Maltby, Rawmarsh, Dinnington, Thurcroft, Wath, Swinton and Aston. The main forms of deprivation affecting Rotherham are low levels of qualification, poor health, high rates of disability and high worklessness, notably long-term sickness.

Adult qualification levels in Rotherham are below average, including the proportion of the population with higher qualifications which reflects Rotherham’s industrial legacy. However, most pupils attending Rotherham’s schools have attainment slightly above the national average. Rotherham colleges provide good quality further education and the new University Centre offer higher education courses

We know from the current cases being referred to Adult Safeguarding that financial abuse is part if not all of the concern within 44% of all cases over the last 3 full financial years. In the current year this pattern is continuing.

Are there any gaps in the information that you are aware of?

Adult Safeguarding do collect data on the outcome of the types of concerns being referred into the service.

South Yorkshire Police have not been able to provide disaggregated figures from the overall fraud cases for South Yorkshire at this point. This is a gap we would expect to be able to address through the project.

The project proposal has been raised with the Safeguarding Champions group and the proposal will be shared with the following strategic groups that have experience in working with those experiencing financial exploitation and abuse:

- Safeguarding Adults Board – October 24th, 2022
- Air Partnership – which includes organisations offering financial advice from across Rotherham - October 26th, 2022

What monitoring arrangements have you made to monitor the impact of the policy or service on communities/groups according to their protected characteristics?

The characteristics of cases being referred to the service will be monitored to see that protected characteristics are being responded to and no group is being left out. As part of the project management of the work we will be performance managing the outcomes and outputs of the project.

Engagement undertaken with customers. (date and group(s) consulted and key findings)

The proposal was also be taken to the Safeguarding Adults Board (October 24th 2022), AIR Partnership (October 26th 2022).

Engagement undertaken with staff (date and group(s)consulted and key findings)

Working group of senior managers from services that have referrals of financial exploitation and abuse have developed the proposal to this point (meeting fortnightly) and will continue to work together to implement the project. The representatives are from

	<p>Procurement, Finance, Housing, Adult Care, Community Safety, Environmental Protection, Performance and Business Intelligence, and South Yorkshire Police.</p> <p>This paper has also been developed with Housing SMT, and the Strategic Director for ACH&PH has been consulted.</p> <p>Training and awareness raising with staff will be one of the key deliverables of the project. In developing the project, the proposal has been shared with staff representatives and the need for awareness that financial exploitation and abuse can impact all communities in Rotherham has been a key message.</p> <p>The groups the proposal has been shared with via presentations is:</p> <ul style="list-style-type: none"> • Safeguarding Adults Board – October 24th • AIR (Advice organisations across Rotherham) Partnership – October 26th. <p>If the Cabinet report recommendations are accepted, then as part of the launch of the project the activities and details of the project will be communicated to staff in line with the communications plan. One of the initial project activities will be to run staff awareness raising sessions.</p>
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4. The Analysis - of the actual or likely effect of the Policy or Service (Identify by protected characteristics)

How does the Policy/Service meet the needs of different communities and groups? (Protected characteristics of Age, Disability, Sex, Gender Reassignment, Race, Religion or Belief, Sexual Orientation, Civil Partnerships and Marriage, Pregnancy and Maternity) - see glossary on page 14 of the Equality Screening and Analysis Guidance)

The project will support the Council with ensuring all parts of the community can access, engage with and benefit from services, and its Equalities, Diversity and Inclusion Strategy which sets out the three key priorities of:

- Understanding, listening, and engaging across all communities
- Delivering fair, inclusive, and accessible services
- Empowering people to engage and challenge discrimination and to promote good community relations

In developing the project, the working group is mindful of cultural, racial and religious barriers that may result in victims of financial exploitation and abuse not wanting to raise concerns. The monitoring of delivery will reflect where cases are coming from and consider if we are not getting cases being referred to from some Rotherham communities.

If this is the case actions to address will be expected to be taken and reported back as part of the project governance.

Does your Policy/Service present any problems or barriers to communities or Groups?

We will make sure that all groups and communities have access to this service – staff training will raise awareness of financial exploitation and abuse so they are aware of where this may be less easy to see and circumstances where the abused is less likely to want to take action.

A key part of the project will be the delivery of awareness training to RMBC staff and to other organisations across Rotherham to build the understanding of all of the different shades of abuse and the clear relevant referral pathways.

Does the Service/Policy provide any positive impact/s including improvements or remove barriers?

This is a new service based upon the experience of the West Yorkshire Team. The new service should enable us to intervene, potentially at an earlier stage because of the service and the intention to prosecute where cases meet the necessary threshold should act as a deterrent from those who are exploiting the vulnerable members of our society.

The West Yorkshire Joint Services developed their service supported by funding from the Office of the Police and Crime Commissioner, a task force of various agencies to address the financial abuse of vulnerable people in relation to scams, frauds and doorstep crime in West Yorkshire. A co-located, multi-disciplinary team, comprising trading standards professionals, financial investigators, a police officer and a social worker, it began uncovering serious criminal activity and financial abuse linked to rogue traders including sales of home improvements – roofing, guttering, driveways, fascia boards, double glazing, mobility aids etc., with evidence of prolific targeting of older, vulnerable consumers with significant financial detriment.

Investigations into a number of organised crime groups identified, for example, at least 150 vulnerable victims of repeat doorstep crime related to one specific offender, others identifying numerous bank accounts aimed at money laundering and scamming victims of vast amounts of money, many over long periods of time.

Since their inception, West Yorkshire has dealt with over 260 referrals alleging financial abuse of adults at risk. The majority of referrals have come from the adult social care teams in the 5 districts (81), in addition to those via the Banking Protocol (67). The Banking Protocol Initiative was launched in May 2017 and is a partnership between financial institutions, West Yorkshire Police and West Yorkshire Trading Standards. This protocol enables bank staff to contact police if they suspect a customer is in the process of being scammed, with an immediate priority response to the branch. This has resulted in direct referrals where concerns re financial abuse are suspected. It has been found that the number of cases is increasing rapidly, as more training is delivered to adult social care

professionals, who then begin to recognise the 'red flags' within their caseloads

What affect will the Policy/Service have on community relations? (may also need to consider activity which may be perceived as benefiting one group at the expense of another)

We will reach out and listen to our under-represented groups and use our customer data to ensure the service is accessible and meeting the diverse needs of our residents by contributing to the following:

1. Understanding, listening, and engaging across all communities
2. Delivering fair, inclusive, and accessible services
3. Empowering people to engage and challenge discrimination and to promote good community relations

Please list any **actions and targets** that need to be taken as a consequence of this assessment on the action plan below and ensure that they are added into your service plan for monitoring purposes – see page 12 of the Equality Screening and Analysis Guidance.

5. Summary of findings and Equality Analysis Action Plan

If the analysis is done at the right time, i.e. early before decisions are made, changes should be built in before the policy or change is signed off. This will remove the need for remedial actions. Where this is achieved, the only action required will be to monitor the impact of the policy/service/change on communities or groups according to their protected characteristic - See page 11 of the Equality Screening and Analysis guidance

Title of analysis: Establishment of a Financial Abuse and Exploitation Service for Rotherham
Directorate and service area: ACH & PH – Housing Services
Lead Manager: Paul Elliott, Interim Head of Housing Operational Services
Summary of findings:
No negative impacts have been identified / are anticipated by the partners in developing this work.

Action/Target	State Protected Characteristics as listed below	Target date (MM/YY)
Performance Monitoring – bi-monthly	ALL	April 2023

***A = Age, D= Disability, S = Sex, GR Gender Reassignment, RE= Race/ Ethnicity, RoB= Religion or Belief, SO= Sexual Orientation, PM= Pregnancy/Maternity, CPM = Civil Partnership or Marriage. C= Carers, O= other groups**

6. Governance, ownership and approval
Please state those that have approved the Equality Analysis. Approval should be obtained by the Director and approval sought from DLT and the relevant Cabinet Member.

Name	Job title	Date
Paul Walsh	Interim Assistant Director of Housing	

7. Publishing

The Equality Analysis will act as evidence that due regard to equality and diversity has been given.

If this Equality Analysis relates to a **Cabinet, key delegated officer decision, Council, other committee or a significant operational decision** a copy of the completed document should be attached as an appendix and published alongside the relevant report.

A copy should also be sent to equality@rotherham.gov.uk For record keeping purposes it will be kept on file and also published on the Council's Equality and Diversity Internet page.

Date Equality Analysis completed	12/10/2022
Report title and date	Establishment of a Financial Abuse and Exploitation Service for Rotherham
Date report sent for publication	
Date Equality Analysis sent to Performance, Intelligence and Improvement equality@rotherham.gov.uk	October 24 th 2022