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: Rothercard Scheme
Date of Equality Analysis (EA): Analysis conducted as part of working group review meetings (Dec21 to Nov 22)

Directorate: F&CS	**Service area:** CIDS, Customer Services
Lead Manager: Helen Barker	**Contact number:**

Is this a:

x	**Strategy / Policy**		**Service / Function**		**Other**

If other, please specify

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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)
Helen Barker	RMBC	Head of Customer Services
Phil Rushton	RMBC	Customer Service Manager
Steve Eling	RMBC	Policy and Equalities Manager

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)

The Rothercard scheme was launched as an anti-poverty initiative in 1993 to prioritise support for Rotherham people living on a low-income by offering a discount on a range of Council services, as well as discounts on goods and leisure activities from a small number of other organisations.

Since then, there has been no strategic management or development of Rothercard and there is no formally agreed departmental owner; although in 2019 Customer Services (F&CS) took on the responsibility for administering card applications, implementing an improved digital application process in 2020.

The current scheme has not been developed or promoted for some time. This is likely to mean that some of the people who could most benefit from the scheme, are missing out.

A review of the current scheme has recently been undertaken and a number of recommended changes to the scheme are proposed.

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

1. **Rothercard Working group**

A working group consisting of cross party elected members and Council officers have reviewed the way the current scheme works and identified opportunities to improve the scheme to meet the following objectives:

- The Council Plan (Page 17, People are safe, healthy, and live well) refers to a 'new' Rothercard 'that will provide discounts on Council services for those who most need them.'
- Outcome 2.15 of the Council's Year Ahead Delivery Plan 2022 (Inequalities are addressed and nobody is left behind) sets out an action to complete a review of the Rothercard scheme.

2. **Demographics:**

The following information was provided by various officers including the Policy & performance team, Revenue & Benefits and Customer Services.

- **Applications by customer group**

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Between 1st September 2020 to 31st March 2022). Of these:

- 2,245 were successful applications
- 283 were declined as the applicants was unable to provide the required evidence of eligibility
- The remaining 451 applications include people who made an initial application but have since either decided not to pursue the application or still need to provide corroborating information/evidence.

Data from the 2,979 applications provides the following breakdown of eligibility criteria as indicated by residents:

Reason for applying:	Number	%
Aged over 60	1,379	**46.30%**
Adult on low income	1,528	**51.30%**
Young person aged 16 to 19 years in full time education	30	**1.00%**
Looked after children/young people	30	**1.00%**
Refugees/asylum seekers dependent on asylum seeker support payments	12	**0.40%**
Total	**2,979**	**100.0%**

Applicants who described themselves as 'adults on low income' indicated that they are in receipt of the following benefits:

Benefit	Number of Applicants	% of total applications
Universal Credit	665	43.5%
Personal Independence Payment	239	15.6%
Working Tax Credit	149	9.7%
Council Tax Reduction	136	8.9%
Employment and Support Allowance	114	7.5%
Disability Living Allowance	85	5.6%
Housing Benefit	59	3.9%
Income Support	43	2.8%
Jobseekers Allowance	15	1.0%
Attendance Allowance	10	0.7%
HC 2/3 Certificate	10	0.7%
Incapacity Benefit	3	0.2%

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	Totals	1528	100%

- **Borough Demographics (info dated Jan 22)**

Only a small proportion of residents (estimated to be around 10K) are currently Rothercard holders; out of approx. 144k residents across the borough who it is believed could be eligible for a Rothercard under the current scheme. This is made up of the following demographic groups:

i)   **Aged over 60**

Mid-year (2021) population estimates:

Age	Total
Aged 65+	52,388
Aged 60-64	16,372
Total	**68,760**

ii)   **Adults on a low income - defined as anyone in receipt of one of the following benefits**:

The data collated below (Jan 22) is from a variety of sources. Exact numbers are continuously changing.

Many adults on low income are in receipt of more than one benefit type. This means that the total number of benefit awards identified in the table below (116k) is not the same as the number of people currently eligible for a Rothercard.

Conversations with colleagues suggest that 63k was a more realistic estimate of 'Adults on Low' income in Rotherham

Benefit	Number of estimated benefit awards across the borough	Comments
Universal Credit	26,395	
Employment & Support Allowance	9,794	
Income Support	1,470	
Job Seekers	952	

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	Attendance Allowance	7,282	These residents are already included in the over 60 age category
	Disability Living Allowance/ Personal Independence Payment	24,174	Only 2,969 exclusively claim DLA/PIPS. Some people in receipt of these benefits are included in the over 60 group
	Incapacity Benefit & severe disablement allowance	197	
	Working Tax Credit	11,200	
	Housing Benefit	12,832	Most people in receipt of Housing Benefit will be receiving Council Tax support, or on one of the other primary benefits such as IS, JSA other benefits already listed
	Council Tax Support	23,437	Some people in receipt of CTax support will also be included int the totals for ESA,JSA,IS & UC
	HC 2/3 Certificate - (help with cost of prescriptions, dentist/optician charges)	unknown	

iii) Young people aged 16 to 19 years in full time education

Data provided by the Office For National Statistics (ONS) according to 2020 (most recent) mid-year population estimates:

Age 16	2,997
Age 17	3,022
Age 18	2,833
Age 19	2,387
Age 16-19	**11,239**

iv) Looked after children/young people

Data provided by CYPS:

Age group	Number
1 to 4 years	93
10 to 15 years	255
16 years and over	96
5 to 9 years	113

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Total children	557

v)   Refugees/asylum seekers dependent on asylum seeker support payments

Data found in Home Office's Immigration statistical release:

Section 95 support by Local Authority					
Date (as at…)	UK Region	Local Authority	LAD Code	Support sub-type	People
31 Mar 2021	Yorkshire and The Humber	Rotherham	E08000018	Dispersed Accommodation	371
31 Mar 2021	Yorkshire and The Humber	Rotherham	E08000018	Subsistence Only	12

3. Accessibility - information about the scheme and applying for a Rothercard

- **Online**

In terms of information relating to the Rothercard scheme that is published online. The Customer Services web team take several steps to make sure the website is user-friendly and accessible to all. We have a review process as part of our everyday workflow whereby:

- Website content is firstly written in draft by the service to make sure it's factually correct.
- Draft content is shared with the Comms team to check it meets writing standards, such as spelling, grammar and readability.
- Content is then supplied to the website team to make sure it is formatted correctly (HTML) and meets accessibility regulations.

To meet accessibility regulations, the Council uses tools such as WAVE Web Aim which evaluates web content for accessibility issues. And we use Silktide Accessibility simulator which simulates a range of disabilities, such as colour blindness, Myopia and Dyslexia. We also use 'read-aloud' services to make sure our content is understandable when spoken. Our website is also independently audited for accessibility by Silktide. The audit by Silktide highlights accessibility issues and recommends fixes. The website team look at the issues and fix the one's which can be fixed by the team. Some of the issues are technical and are raised with our website supplier. Our website is currently scoring 97 out of 100 on the Silktide index and has been in the top 30 of UK councils for over the past 24 months.An independent company (Silktide) assess over 400 local authority websites on a monthly basis against website accessibility standards. RMBC has been in the top 30 each month for the last 24 months.

The Council's Accessibility statement provides a wide range of information for customers about how top get the most out of their online experience.

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- **Telephone**

The Customer Services contact centre support anyone unable to self-serve online by providing going through the application process with the customer over the telephone.

- **In person**

Where either of the above contact channels are not appropriate for the customer, a pre-arranged telephone appointment can be arranged and conducted face to face at any of the Council's six Customer Service centre locations.

- **Translation services**

DA Languages are the Councils' appointed Translation and Interpretation provider and arrangements are in place to support any customer with language difficulties.

The Council's accessibility pages provide information about how to change language settings for customers transacting online.

- **Disabilities**

The Council's Customer Access strategy sets out the Council's commitment to ensure all customers, regardless of circumstances can access the help and support they need and provides a range of channels and contact methods for people to choose from.

- **Physical Rothercard**

In today's world people increasingly prefer to save documents, tickets and membership cards in a virtual wallet rather than having to carry a physical record with them just in case it's needed.

There is no current facility to provide users with a digital pass but it is anticipated that a solution will be available to offer to customers by the Autumn 2023.

4. Service Take Up:

The collection of data to evidence Rothercard usage is not consistent and does therefore currently provide any reliable information about how the scheme might be positively impacting on people's lives.

A new digital corporate equalities template has recently been designed to 'add on' to any digital form (when appropriate) and should in the future extend the amount of equalities data captured when customers are requesting services that involve a Rothercard discount.

5. Residents who do not meet the eligibility criteria for a Rothercard

The recommended changes to the Rothercard scheme are intended to deliver a new and improved scheme that 'will provide discounts on Council services for those who most need them; with a regular review to ensure the offer remains right for the residents of Rotherham.

A piece of work to be developed during 2023/24 will explore options for a different Rothercard offer for those who do not meet the eligibility criteria. Local businesses for example may be interested in offering Rotherham residents a discount to goods/services as a way of boosting their trade and increasing the number of people 'shopping local.'

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6. **Other related programmes and projects :**

- The Rotherham Place Digital Inclusion programme; working with charities and partners to address digital divides within the community with a particular focus on the ability of residents in protected groups to access services.
- Digital Strategy - four interlinking themes that collectively aim to reduce the digital-divide and help residents that might otherwise struggle, overcome barriers and enjoy the benefits of digital technologies.
- Thriving Neighbourhoods Strategy - creating the capacity, interest and enthusiasm for individuals and communities to do things for themselves
- Customer & Digital programme – implementation of customer improvements that are designed as digital first, based on a series of design principles to ensure they are built consistently and to agreed standards. Wherever possible, and particularly for high demand/sensitive/complex processes, we involve members of our customer user testing group. We have around 50 residents who have expressed interest in helping, together with established groups such as the Digital Inclusion Stakeholder group with representation from the 3rd sector such as Age UK
- Access to free wi-fi in Council buildings for people without their own broadband/data access
- Rotherham Place Digital Roadmap – a 5 year roadmap to empower patients and citizens to better self-manage their own health and care through digital services and support the transformation of our health and care services so that they can increasingly be delivered out in the community.
- Promoting, encouraging and supporting those who are able, to be more motivated to engage digitally, and feel more inclined to choose 'online' as their channel of choice.

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

As referenced previously, there is very little data consistency at present; something which will be resolved as part of the redesign of the scheme.

Equality information is not currently captured. The use of a single digital process (as per Customer & Digital design principles) coupled with the use of the new standard equalities questionnaire should extend the amount of usable data captured.

For example, by capturing scheme usage based on gender, ethnicity and disability, the Council can identify any groups where take-up is disproportionately lower than it should be; allowing for a more targeted awareness raising campaign.

Some form of public consultation would also further increase the Council's understanding of how the scheme is benefiting its residents, as well as providing an opportunity to find out if there are any links between the take up of specific discounted services and protected groups. For example, Rothercard holders from protected group x are not making use of the discount for these kinds of sporting activities.

All of this information can then be assessed as part of the annual review and used as the evidence to propose any potential changes to the offer.

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

- Customer feedback channels including but not limited to:
    - Website Feedback form. This is designed for customers to share their thoughts about their website experience
    - Customer Access Strategy - this web form encourages customers to tell us what we can do to make it easier for customers to access the services they need and to share ideas about new features we might not already offer.
    - Rothercard scheme feedback questionnaire – to be developed during 2023/24
    - Comments, compliments, complaints – formal or informal
    - Digital Inclusion working group
    - Community Reference group

- Review of Rothercard application data over the first few months following implementation of the improved scheme and related processes
- Financial impact – There are no corporate budget allowances for income streams where Rothercard discounts make up a significant proportion. Services are expected to manage any pressures or gains arising from discounts for their services as part of their monthly monitoring.
- Annual review of the scheme

Engagement undertaken with customers. (date and group(s) consulted and key findings)	See Section entitled '*What equality information is available? (Include any engagement undertaken)*'
Engagement undertaken with staff (date and group(s)consulted and key findings)	The following Council officers have provided information that has helped the Rothercard Working group establish how the scheme works/is used now, and how it could be improved in the future:

Name	Directorate	Date
Michael Holmes	Assistant Chief Executive	Jan, Sept 2022
Rob Cutts	Finance & Customer Services	Apr, Sept 2022
Andrew Sheldon	Finance & Customer Services	Apr, Sept 2022
Nikki Kelly	Finance & Customer Services	Nov 2021
Sam Barstow	Regeneration & Environment	Jul,Aug 2022
Leanne Buchan	Regeneration & Environment	Nov 2022
Barry Connolly	Regeneration & Environment	Jul,Aug,Sep 2022
Chris Siddall	Regeneration & Environment	Apr 2022, Dec 2022
Donna Furniss-Morton	Regeneration & Environment	Jul 2022

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		Phil Rushton	Finance & Customer Services	Ongoing
		Charlotte Cheetham	Finance & Customer Services	Ongoing
		Ashley Haystead	Finance & Customer Services	Apr 2022
		Jo Longworth	Regeneration & Environment	May 2022

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 Rothercard scheme was launched as an anti-poverty initiative in 1993 to prioritise support for anyone living in a property which is registered for Council Tax in Rotherham and able to provide evidence of meeting one of the criteria set out in the current scheme.

The current scheme has not been developed or promoted for some time which is likely to mean that some of the people who could most benefit from the scheme, are missing out.

The Council Plan (Page 17, People are safe, healthy, and live well) refers to a 'new' Rothercard '*that will provide discounts on Council services for those who most need them*.'

Outcome 2.15 of the Council's Year Ahead Delivery Plan 2022 (*Inequalities are addressed and nobody is left behind*) sets out an action to complete a review of the Rothercard scheme. (completed Nov 22)

The review took into account all available information to determine how a new and improved Rothercard scheme that 'will provide discounts on Council services for those who most need them,' could be delivered. The proposed improvements will mean that for all residents, regardless of protected group:

- Customer experience will be enhanced in terms of both applying for and benefiting from the Rothercard scheme
- the right people will be taregted to increase awareness of the scheme
- the scheme will reviewed on a regular basis so that the offer remains right for the residents of Rotherham

- business intelligence will be more gathered consistently and analysed more regularly so the Council can better understand take-up rates and outcomes

As the assessment of current equalities information confirmed, appropriate support is in place for all groups to ensure they can access the help and support they need when enquiring about /applying for a Rothercard.

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

Research suggests that some customers and communities are more likely to find it difficult to access services in the same way that others might take for granted. For example, national data finds that digital exclusion is more evident amongst the elderly, disabled, and individuals from BAME and socially deprived communities.

Through work already taking place as part of the Customer & Digital programme and Digital Inclusion programme, any opportunity to improve service access/delivery can be identified and appropriate plans put in place to reduce digital inequalities.

The focus of the Rothercard scheme is to benefit residents who most need it, which is not necessarily everyone who has reached pensionable age. For this reason, applicants will need to meet both the 'low income' and state pension age' criterion to be awarded a Rothercard in future.

Anyone 'aged 60 & over' who already has a Rothercard can however continue using their card until it expires; even if they would not be eligible once the new criteria has been introduced. Once the resident's card expires (5 years from the original issue date) they will need to reapply under the eligibility criteria of the new scheme.

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

The new scheme means more young people can apply for a Rothercard. The criteria currently requires a young person to be 16-19 and in full time education. The new scheme removes the need for a young person to be in education and expands the age range to 16-21.

Anyone of any age who meets the 'adult on low income' criteria will be able to apply for a Rothercard; and, for anyone on low income who has also reached the state pension age, they will be awarded a Rothercard that does not have an expiry date.

Section 95 Local Authority supported refugees/asylum seekers will be automatically granted a Roterhcard with a 12 month expiry date. These customer groups have arrived in the borough as a result of a humanitarian crisis and the benefits of the Rothercard scheme compliments other support packages already in place and provides quicker access to the type of activities that have a positive impact on mental health and wellbeing.

This is a positive step. It is one less 'thing to do' for newly arriving refugees or asylum seekers.

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> **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)
>
> Strong and collaborative community engagement is essential in delivering effective, efficient and inclusive customer centric services.
>
> The new Rothercard scheme is designed to provide discounts on Council services for those who most need them so it is anticipated that the impact of this change will be a positive one.
>
> The future scheme will benefit from improved data gathering, more regular assessment and the annual review; making it easier to identify any changes needed to the 'offer' also taking into account other work already taking place as part of the Thriving Neighbourhood Strategy, Customer & Digital programme and Digital Inclusion.

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.

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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: Rothercard Scheme
Directorate and service area: Customer Services, Finance & Customer Service
Lead Manager: Helen Barker
Summary of findings:

Action/Target	State Protected Characteristics as listed below	Target date (MM/YY)
Design and build improved application and assessment process	**ALL**	**04/23**
Create Comms Plan - Promotion of new scheme in advance of new scheme being introduced, and continuing afterwards	**ALL**	**03/23**
Implement a digital card	**ALL**	**10/23**
Work with local businesses to explore the potential for offering discounts to Rothercard holders	**ALL**	**10/23**

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Questionnaire to seek customer feedback about the new Rothercard scheme	**ALL**	**10/23**
Undertake an annual review of the scheme	**ALL**	**11/23**

*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
Steve Eling	Policy and Equalities Manager	13/12/2022

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	13/12/2022
Report title and date	Rothercard Scheme
Date report sent for publication	
Date Equality Analysis sent to Performance, Intelligence and Improvement equality@rotherham.gov.uk	13/12/2022