

We support the reduction of burden on public organisations, however moving away from some of the prescriptive processes can move away from being able to transparently demonstrate progress in equalities.

We support focussing on results and outcomes but reiterate the concerns that unless you measure these results and publish progress towards the outcomes, the public will be unable to challenge us on our progress on equalities.

We feel that the removal of the requirement to publish information around engagement with our communities for policies and our equality objectives would have the potential for some public bodies not to engage fully in setting these objectives which would render them irrelevant to the local community. There needs to be a standard way across all agencies that we should engage to ensure comparisons are valid.

We also feel that removing the requirement to publish information about equality analysis that has been undertaken and information considered when reaching policy decisions would be a massive step back. We are only starting to get to a stage where services understand how they should tailor their service to ensure that it promotes equality and has equal access to all members of our community. This requirement has been an advantage to services as they are able to make them more efficient and streamlined to need. Taking this requirement away may stop some areas analysing their decisions thereby having a detrimental affect on specific protected characteristics, not having the information available about how these decisions were reached will render any ability by the public to challenge.

We believe strongly that not publishing this information will render the ability of the public to hold us to account over our progress on equalities useless.

Removing the requirement to set how progress will be measured is not appropriate as it will again render the ability of the public to challenge us useless. The public need assistance and information in understanding the complexities of Equalities and how progress can be made to be able to challenge whether the progress we are making is appropriate.

Taking away the power for priorities to be set centrally may diminish the power of the Equality Act and is a concern. The whole purpose is to protect those people who are in the minority and need someone to stand and make people act on their behalf, not having anyone with that ability centrally could be detrimental to the progress that has already been made on behalf of people with these protected characteristics. This could mean that local democracy will potentially steer some local decisions linked to equality. As most of the protected groups - ethnic minorities, Gay people etc are low in numbers their voices will be drowned out. The legislation designed to protect these groups could have the opposite effect as parochial localism could set the agenda.

We strongly think some form of 'top down' nationally set robust guidance on equality duties is still essential. Otherwise locally set issues will allow public bodies to not deliver on their responsibilities.

There is plethora of information available that details the differential outcomes that various 'protected characteristics' experience across the full life cycle. History shows that progress on equality does not happen without appropriate 'lever's or 'sanctions' for failure.

Overall we feel this proposed legislation is a charter for diluting equality duties and any advancement in equalities already made.