Layers of Inequality

A Human Rights and Equality Impact Assessment of the Public Spending Cuts on Black Asian and Minority Ethnic Women in Coventry

A Joint Report of Coventry Women's Voices, Coventry Ethnic Minority Action Partnership, Foleshill Women's Training and the Centre for Human Rights in Practice, School of Law, University of Warwick

By Kalwinder Sandhu, Mary-Ann Stephenson and James Harrison

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About us

The Centre for Human Rights in Practice provides a focus for academics, students, practitioners and activists who wish to advance the study and promotion of human rights at a local, national and international level. http://www2.warwick.ac.uk/fac/soc/law/chrp/
Coventry Women's Voices works to ensure that women's voices are heard in Coventry when policy is made. www.coventrywomensvoices.wordpress.com
Coventry Ethnic Minority Action Partnership works with people, organisations and agencies to improve the delivery of services to Ethnic Minority Communities in Coventry. www.cemap-coventry.org.uk
Foleshill Women's Training are dedicated to helping all women in Coventry and the surrounding areas through social, health and economic programmes. http://www.fwt.org.uk/

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This report is available on-line at http://www2.warwick.ac.uk/fac/soc/law/chrp/projects/humanrightsimpactassessments/women/

Executive Summary

1. Introduction

This is a summary of the key findings of the human rights and equality impact assessment (HREIA) of the spending cuts on Black, Asian and Minority Ethnic (BAME) women in Coventry carried out by Coventry Women's Voices (CWV), Coventry Ethnic Minority Action Partnership (CEMAP), Foleshill Women's Training (FWT) and the Centre for Human Rights in Practice at the University of Warwick (CHRIP).

The report examines nine broad areas where the spending cuts are having, or are likely to have, an impact on BAME women. These areas are based on the priorities identified by individual women and organisations with whom we consulted during the drafting of this report.

The report concludes that many of the spending cuts will have a disproportionate impact on BAME women. Taken together, the combined impact of job losses and cuts to spending on welfare benefits, education, health, social care, legal aid and voluntary services will exacerbate existing inequalities between BAME women and other groups and pose a serious risk to some BAME women's human rights.

As well as the potential negative impact of the cuts on BAME women, the report highlights areas where public authorities, such as the Coventry Partnership and Coventry City Council, have taken measures to mitigate the negative impact of the cuts. These include action by Coventry Partnership to measure and mitigate against the impact of welfare benefit cuts; the decision by Coventry City Council not to pass on the cuts in Council Tax Benefit from central Government; and to provide additional funding for local services to replace funding lost from Central Government.

The cuts in Coventry

- In Coventry cuts to welfare benefits are projected to cost residents of the city £112 million per year.[1]
- As a result of cuts from national Government and a rising population, Coventry City Council's annual funding per person will fall from £929 in 2010/11 to £717 in 2015/16.[2]

Cllr Ann Lucas, Leader of Coventry City Council, commenting on these cuts has said: *Coventry is being hit hard by the spending cuts. We are doing what we can to prevent the worst impacts on people in the city, but we are facing hard choices. There will be cuts to our services and it is going to be very tough for people over the next few years.*[3]

One third of the population of Coventry is BAME.[4] BAME women are likely to be disproportionately affected by cuts to benefits, jobs and services.

BAME women and the cuts

- BAME women are more likely to be living in poverty.[5]
- BAME households on average receive a higher proportion of their income from working age benefits or tax credits.[6]
- BAME women face multiple disadvantages in the labour market including disproportionate representation in low paid and insecure unemployment and various barriers to finding a job, including a combination of sexism and racism.[7]
- Unemployment is higher among all groups of BAME women than among white women or white men.[8]
- BAME women are disproportionately likely to work in the public sector. For example, 45.6% of Black women of Caribbean origin in paid work are in the public sector.[9]
- BAME groups as a whole are more likely to report ill health and experience ill health earlier than white British people.[10]

The effects of the cuts cannot be viewed in isolation. They are just one part of a jigsaw of issues that affect BAME women including historic and on-going disadvantage, discrimination and racism. Our title, *Layers of Inequality,* represents what women have said to us about the multiple impacts that BAME women face as a result of the cuts and how these come on top of the challenges they face on a daily basis as a result of their gender and ethnicity and other experiences of disability, poverty etc.

2. The Labour Market

There have been widespread public sector job losses across the UK and in Coventry. BAME women are more likely to be employed in the public sector than white women or men in the same ethnic group and are therefore more likely to be hit by public sector job cuts.[11] These cuts may exacerbate an existing pattern of low paid, insecure employment and higher than average rates of economic activity among BAME women who already face a variety of barriers to accessing the labour market; including childcare, language barriers and a combination of racism and sexism.

Examples of impact in Coventry include:

- Unemployment among BAME women in Coventry increased by 74.4% between 2009

and 2013. Unemployment among white British women increased by 30.5% during the same period.[12]

- The Work Programme in Coventry has not proved successful in finding work for women of any ethnic background, but BAME women have fared worse than white women. Of the 1290 white women referred to the Work Programme in Coventry up to July 2012, 60 found jobs. 10 out of 210 Asian women referred found work. Out of 280 referrals of women from other ethnic groups none found work.[13]
- The decision by Coventry City Council to pay the living wage of £7.45 an hour to all staff will particularly benefit BAME women who are more likely to be in low paid work.[14]

3. Housing

There have been a series of cuts to Housing benefit. BAME communities have a higher proportion of households on low incomes and are more likely to require accommodation for larger families than other groups. They are therefore more likely to be affected by these cuts. BAME women may face a stark choice between moving house, disrupting their children's education and losing support networks, or making up for cuts in housing benefit from already limited budgets.

Examples of impact in Coventry include:

- In Coventry over 39,000 households receive housing benefit.[15] It is estimated that 9,200 households in Coventry will be affected by Local Housing Allowance changes with a total loss of £13.21 million.[16]
- A family with three children, parents and grandparents living in the same house in Coventry would face a shortfall of £467 per month between the available Local Housing Allowance (£167.31 per week, the maximum for four bedrooms) and the average local rent of £1193 per calendar month for a five bedroom property.[17]
- BAME families in Coventry are already concentrated in the most over-crowded parts of the city. There are concerns that these cuts will increase overcrowding.[18]

4. Incomes and Poverty

There have been a series of cuts and changes to welfare benefits and tax credits including a cap on the total level of benefits working age people can receive. These will disproportionately affect BAME women who are more likely to be poor than the general population[19], more likely to have larger families and receive a higher proportion of their income from benefits.[20] BAME women will also be affected by the decision to pay Universal Credit as a single monthly payment to one person in the household, which will make it difficult to budget and may reduce their financial independence.

Examples of impact in Coventry include:

- The cost to women in Coventry of all the cuts to welfare benefits and tax credits will be approximately £76 million a year.[21]
- Coventry City Council estimate 270 households and 1300 children will be affected by the benefits cap.[22] The DWP estimates that 'of the households likely to be affected by the cap approximately 40% will contain somebody who is from an ethnic minority'.[23]
- Coventry Citizens Advice Bureau has reported that 'BAME women are more likely to lose ESA, more likely to be JSA sanctioned, more likely to lose DLA/PIP, less likely to appeal bad decisions and more likely to be exploited by others, such as private landlords or family members.[24]

5. Education and training

Total public spending on education in the UK is estimated to fall by over 13% in real terms between 2010/11 and 2014/15.[25] Some of these cuts will have a disproportionate impact on BAME women (for example, changes to provision of ESOL). Others, such as the end of Education Maintenance Allowance (EMA), are affecting low income families, which includes a disproportionate number of BAME families. BAME women may find it harder to meet the increased costs of studying.

Examples of impact in Coventry include:

- There have been cuts to mental health support in schools in Coventry and a reduction in support for dyslexia, behaviour and attendance, speech and language and sensory support.[26]
- Loss of Education Maintenance Allowance has led to an increase in debt cases coming to Coventry CAB.[27]
- Voluntary organisations in Coventry are reporting that women have to wait longer to access English for Speakers of Other Languages (ESOL) courses.[28]

6. Violence against women

Victims and survivors of violence in Coventry are being and/or will be affected by a series of cuts and changes including loss of funding for local services, cuts and changes to the police and Crown Prosecution Service, cuts to NHS spending, cuts to legal aid and cuts to welfare benefits including housing benefit. These services affect all women, but BAME

Cross-cutting concerns

There are some issues that have been identified on a number of different occasions throughout this report and are worth emphasising. These include:

Lack of data

Research for this report highlighted a lack of both local and national data that is broken down by both gender and ethnicity. Often data was available broken down by gender, or ethnicity but not both. Where data was broken down by ethnicity it was often only split into 'white' and 'BAME', obscuring significant differences between different ethnic groups. Coventry City Council is collecting and analysing data on the impacts of welfare benefit changes on different groups in the city, but this work is limited in some areas by the data that is available. This lack of availability of data makes it difficult to project or monitor the impact of policies on BAME women.

Increasing use of technology

The increasing requirement to use the internet/telephone to apply for jobs or claim benefits impacts on those BAME women who do not have access to the technology, or the confidence or ability to use it. They may be unable to claim the benefits to which they are entitled, or may be at risk of benefit sanctions if they are unable to meet Job Centre requirements to apply for particular jobs. The loss of face to face contact may create problems for women with multiple or complex needs who may not be able to communicate effectively over the telephone.

Impact of cuts on public attitudes

Many women commented that alongside the financial impact of the cuts they also felt the public's negative attitudes towards people on benefits, is increasing. In addition to a feeling of increased instances of discrimination and racism has led many women to sense that the atmosphere of scarce resources was leading people to look for scapegoats for the pressure they felt under. There was a widespread feeling that this was made worse by the rhetoric used by some politicians.

women are particularly likely to experience particular forms of violence. BAME women's experience of violence may also differ because of issues including marginalisation and racism.

Examples of impact in Coventry include:

- Panahghar, which provides specialist services for BAME women experiencing violence and abuse in Coventry, lost £300k a year for their refuge provision in Leicester. This has had an impact on staffing and services available to women in Coventry.
- Coventry Rape and Sexual Abuse Centre lost funding from the Equality and Human Rights Commission to do outreach work with communities that do not currently access their services, including BAME women. CRASAC is currently continuing to provide funding for this project.
- Coventry Haven has had a 10% cut to funding from Supporting People.
- For the 30,000 women in Coventry who are likely to have been raped or sexually abused at some point in their lifetime[29] and 38,000 women who are likely to experience domestic violence in their lifetime[30] these cuts are likely to lead to less successful investigation and prosecution of offenders, more on-going mental, physical and sexual health problems and more women trapped in violent relationships.

7. Health

The NHS is required to make savings of up to £20 billion by 2015.[31] These cuts will affect all patients and staff but will have a particular impact on BAME women because their health issues and experiences of health care differ to that of white women. Impacts include: increased waiting times, increased cancellation of appointments, shortage of interpreters, and the risk that violence against women will go undetected.

Examples of impact in Coventry include:

- There has been a fall in the number of hospital beds from 1158 to 1125 (University Hospitals Coventry and Warwickshire) and 348 to 324 (George Elliot) between 2010 and 2013.[32]
- In the last quarter of 2012/13 only 84.7% of patients in Accident and Emergency in Coventry were seen within the target time of four hours or less compared to a national average of 94.1%.[33]
- Cancellations of appointments at University Hospitals Coventry and Warwickshire NHS Trust rose from 575 to 667 between 2011/12 and 2012/13. In the same period cancellations at the George Elliot hospital rose from 115 to 135.[34]
- Women in Coventry reported a lack of translation and interpretation services which may lead to BAME women not getting the healthcare that they need and lead to violations of privacy.

8. Social care

Coventry City Council's Community Services Directorate needs to find savings of £14m for 2014/15, rising to £22.5m by 2015/16.[35] Cuts to social care will affect both women and men from all ethnic groups in Coventry who either need or provide care. However, there may be particular impacts on BAME women who provide proportionately more care.[36]

Examples of impact in Coventry include:

- Agencies we spoke to compared Coventry favourably to a number of other local authorities.
- However, they also highlighted current problems and predicted potential future problems in social care including: increased charges for services, a reduction in the level of services available and staff cuts.

9. Legal Advice Services

Legal advice services in Coventry and across the Midlands are facing cuts to the funding they receive for civil legal aid work which will disproportionately affect BAME women.[37] BAME women also face particular issues because of cuts/changes in relation to legal advice for domestic violence, employment, immigration and asylum, and welfare benefits issues. Other changes, like the introduction of a telephone gateway and a proposed 12 month residency test will have a significant impact upon some BAME women.

Examples of impact in Coventry include:

- Coventry Law Centre is losing £200 -250k a year from cuts to legal aid, which represents a fifth of its annual income.
- Coventry Law Centre has a 90% success rate for appeals against Employment Support Allowance decisions.[38] This work will no longer be funded by Legal Aid and although Coventry City Council continues to provide some funding, they will struggle to meet demand.
- Coventry Haven estimate that 70% of victims and survivors of violence will not be able to provide the evidence of domestic violence needed in order to access legal aid in family law cases and that the situation will be worse for BAME women.[39]

10. Voluntary organisations

Voluntary organisations in Coventry have been impacted by cuts to a number of local and national funding streams, increased levels of applications to charitable trusts and changes to commissioning of services. BAME women rely on voluntary organisations to provide a range of services, advocacy and support. In particular BAME women's organisations provide services and specialist expertise that are sensitive to the experiences of BAME women's lives including multiple discrimination, culture, faith and poverty in a way that mainstream organisations are often unable to match.

These cuts take place against a background of historic underfunding of the BAME women's voluntary sector.[40] A large proportion (53%) of funding for BAME voluntary and community organisations comes from statutory sources so these organisations are vulnerable to public spending cuts.[41]

Examples of impact in Coventry include:

- Foleshill Women's Training's funding has fallen from £450k in 2010/11 to £190K in 2012/13.
- Coventry Carers' Centre has lost funding for work with BAME carers of people with learning disabilities.

11. Cross-Cutting Concerns, Combined Impacts and Actions Required

We set out some examples of the combined impact of the spending cuts on particular groups of women. A summary of one of those examples is provided below.

Example of combined impact: Women who experience language barriers

All of the cuts and changes detailed in this report will be exacerbated for women who experience language barriers.

Cuts to interpretation and translation services will reduce access to services and may lead to an increase in expectations and burdens on family members to translate, reducing privacy and the ability of women in violent relationships to disclose what is happening to them to health professionals. There may also be an impact on the education, employment or finances of family members who have to take time off to act as interpreters.

Women experiencing language barriers who need to claim benefits will find the requirement to apply online difficult to fulfil. They will be at greater risk of sanction of benefits if they do not understand what is required of them or cannot meet the requirements of the Job Centre.

The loss of legal aid will be particularly problematic for women in this situation who will have an increased need for specialist advice and are unlikely to be able to represent themselves or even access information via the telephone gateway.

The loss of specialist support services will have a particular impact on women who experience language barriers who may be unable to access generic services, or find services that can meet their needs. In addition, mainstream voluntary organisations which lose funding may no longer be able to support translation and interpretation services.

It may be harder for women to overcome these language barriers because of changes to ESOL provision.

Public authorities have legal obligations to promote equality and not to breach human rights. In order to do this effectively they need to consider the potential impact of all budget cuts on equality and human rights and carefully monitor the actual impact, particularly on the most vulnerable groups. This includes action by National Government to collect and monitor evidence of local impact and take action where necessary.

Public authorities should ensure that data is collected and reported in a way that allows analysis of the impact on different equality groups, including women from different BAME communities. Data should be published in an accessible format so that it can be used by other actors including civil society groups.

Public authorities should ensure that they co-ordinate their policies and practices where multiple agencies have an impact on a particular issue.

Other actors can play important roles in monitoring impacts, campaigning and bringing cases to courts.

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1. Introduction

1.1 Overview

This report records the human rights and equality impact assessment (HREIA) of the spending cuts on Black, Asian and Minority Ethnic (BAME) women in Coventry carried out by Coventry Women's Voices (CWV), Coventry Ethnic Minority Action Partnership (CEMAP), Foleshill Women's Training, (FWT) and the Centre for Human Rights in Practice at the University of Warwick, School of Law (CHRP).

It analyses the initial impact on BAME women in Coventry of public spending cuts that have already taken place and considers the potential longer term impact of these cuts along with the impact of cuts planned for the future.

This HREIA focuses on the specific impact of the cuts on BAME women in Coventry examining both the equality impact (how the cuts will affect BAME women relative to other groups) and the human rights impact (how the cuts will affect the human rights of BAME women, particularly the most vulnerable). This means that we examine some areas where BAME women will be disproportionately affected by the cuts, and other areas where the impact is not disproportionate but is sufficiently severe to have potential implications for their human rights. As well as cuts to budgets we also examine the impact of changes such as the introduction of telephone/computer based claim systems, which, combined with other cuts, may have a detrimental impact on some BAME women and their families.

This introduction sets out the background to the report, the reasons for the focus on BAME women and provides some contextual information about the situation of BAME women in Coventry and the UK as a whole. The final section of the introduction sets out the structure of the rest of the report.

While many of the impacts of the spending cuts are already being felt by BAME women, other cuts have only just taken place, or are planned for the future meaning that the actual combined impact can only be projected. This report therefore represents a snapshot of the situation in the first half of 2013. There will inevitably be changes. The conclusion of each chapter highlights the monitoring necessary to measure the on-going impact of the public spending cuts on BAME women.

1.2 Background to this report

1.2.1 The cuts

The 2010 Comprehensive Spending Review (CSR) announced £34bn in cuts to funding for public services by 2012-13, totalling £81bn by 2014-15.[1] In the Autumn Statement of 2012,[2] the Chancellor of the Exchequer announced a further £6.6 billion package of savings from welfare, overseas aid and departmental spending. The 2013 Budget included an announcement of a further £11.5bn of cuts in the forthcoming 2015-16 Spending Review.[3]

1.2.2 The cuts in Coventry

The following examples illustrate some of the main cuts that are happening in Coventry:

- In Coventry cuts to welfare benefits are projected to cost residents of the city £112 million per year.[4]
- Coventry City Council's budget has fallen from £293.3 million in 2010/11 to £267.4 million in 2012/13. By 2015/16 it is projected to fall to £242.5 million, a drop of £50.8 million.
- At the same time the population of Coventry is projected to increase from 315,739 in 2010/11 to 337,985 in 2015/16.
- The Council's annual funding per person will fall from £929 in 2010/11 to £717 in 2015/16.[5]
- University Hospital Coventry and Warwickshire are required to make further cuts of £41M for 2013/14 after making cuts of £56M in the previous two years.[6]
- The settlement for West Midlands Police for 2013/14 is £474.7M down from £482.2M, a reduction of 1.6%.[7]

Cllr Ann Lucas, Leader of Coventry City Council, commenting on these cuts has said:

> *Coventry is being hit hard by the spending cuts. We are doing what we can to prevent the worst impacts on people in the city, but we are facing hard choices. There will be cuts to our services and it is going to be very tough for people over the next few years.*
> Cllr Ann Lucas, Leader Coventry City Council.[8]

1.2.3 Impact on all women

According to analysis by The Fawcett Society, to date £14.9 billion of cuts have been made to benefits, tax credit, pay and pensions with 74% coming from women's incomes.[9]

In April 2011 Coventry Women's Voices and the Centre for Human Rights in Practice published *Unravelling Equality?: A Human Rights and Equality Impact Assessment of the Public Spending Cuts on Women in Coventry*.[10] That report concluded public spending cuts will hit women in Coventry harder than men - projecting that they would lose more income, more jobs and more services than men and would face additional demands to provide unpaid care as public services were cut.

Our conclusions matched those of other groups including the Fawcett Society, TUC and Women's Budget Group.[11]

Unravelling Equality looked at all women in Coventry, but the report recognised that certain groups of women, particularly the poorest and most vulnerable, are likely to be particularly badly hit by the spending cuts. These include older women, young women, lone parents, Black, Asian and Minority Ethnic (BAME) women, victims and survivors of violence and disabled women.

Coventry Women's Voices and the Centre for Human Rights in Practice have continued to investigate this impact on particular groups of women in Coventry. A second report, *Getting off Lightly or Feeling the Pinch? A Human Rights and Equality Impact Assessment of the Public Spending Cuts on Older Women in Coventry* was published in July 2012.[12] It concluded that cuts to public services including health, social care and transport will all have a significant and disproportionate impact on older women.

This report is the third in our series of reports looking more closely at how the most vulnerable groups are being affected as the cuts start to bite. This report is unique in that it brings together the impact of cuts to welfare benefits, public services and jobs on BAME women's lives and examines how these cuts will combine to particularly devastating effect. Throughout the report we detail the different experiences of different groups of minority ethnic women where possible.

1.3 Why BAME women?

Our first report into the impact of the spending cuts, *Unravelling Equality*, identified BAME women as one of the groups likely to be disproportionately affected by cuts to benefits, jobs and services. This impact comes on top of an existing situation of disadvantage and discrimination experienced by many BAME women in Coventry. We felt it was important to record the experiences of this group of women, particularly since, as one participant, put it

> *BAME women do not have a strong and vibrant voice at 'the table'.* [13]

BAME women are likely to be disproportionately affected by the spending cuts because:

BAME women are more likely to be living in poverty:
Taking as a definition of poverty households on 60% or less of median incomes:

- 16% of white households are living in poverty
- 21% of 'mixed' households are living in poverty[14]
- 32% of Asian or British Asian households are living in poverty – this breaks down to:
  - 23% of households of Indian origin
  - 46% of households of Pakistani or Bangladeshi origin
- 28% of Black or Black British households are living in poverty – this breaks down to
  - 23% of households of Caribbean origin
  - 31% of households of Black non Caribbean origin
- 27% of households of Chinese/other ethnic origin are living in poverty

BAME women are more likely to receive a higher proportion of their income from benefits
According to the 2012 DWP Family Resources Survey:

- 8% of the income of white households comes from working age benefits or tax credits.
- 13% of the income of Asian or British Asian households comes from working age benefits or tax credits
  - 8% for households of Indian origin
  - 25% for households of Pakistani/ Bangladeshi origin
- 17% of the income of Black or Black British households comes from working age benefits or tax credits
  - 15% for households of Caribbean origin
  - 19% for households of non Caribbean origin
- 12% of the income of mixed ethnic origin households comes from working age benefits or tax credits[15]

BAME women are disadvantaged in the labour market

- Unemployment is higher among all groups of BAME women than among white women or white men. Unemployment is higher among women of Indian, Pakistani or Bangladeshi origin than among men from the same ethnic group. It is lower among Black women of Caribbean or African origin than among men from the same ethnic group.[16]
- Some groups of BAME women, particularly women of Bangladeshi and Pakistani origin are disproportionately likely to be 'economically inactive', neither in paid work nor registered as unemployed.[17]
- Black Caribbean women and disabled people with higher level qualifications experience a higher pay gap than those without qualifications.[18]
- The All Party Parliamentary Group (APPG) on Race and Community's inquiry into ethnic minority female unemployment found that "Black, Pakistani and Bangladeshi women face specific barriers in the labour market which are not solely based on just their gender, or just their ethnicity."[19]

BAME women are disproportionately likely to work in the public sector
Women are more likely to work in the public sector than men (34% compared to 16%). Of those in paid work

- 34% of white British women work in the public sector compared to 15.9% of men

- 29.9% of women of Indian origin work in the public sector compared to 15.9% of men
- 37.2% of women of Pakistani origin work in the public sector compared to 9.5% of men
- 36.4% of women of Bangladeshi origin work in the public sector compared to 9.7% of men
- 45.6% of Black women of Caribbean origin work in the public sector compared to 20.8% of men
- 33.9% of Black women of African origin work in the public sector compared to 21.33% of men.[20]

The wider context of the lives of BAME women

The impact of the spending cuts have to be seen in the context of the lived experiences of BAME women, including historic and on-going disadvantage, discrimination and racism within society. Many of the women interviewed for this report stressed that the spending cuts were only some of the challenges they face every day. Our title, *Layers of Inequality* represents not only the multiple impacts that BAME women face as a result of the cuts, but that these come on top of the challenges they face on a daily basis as a result of their gender and ethnicity and other experiences such as disability, poverty etc.

The spending cuts need to be considered in the context of issues like racial harassment and hate crimes. In the West Midlands the number of recorded racist incidents was 2765 in 2011/12 up by 4% on previous year. 89% of all recorded hate crimes were race hate crimes.[21] There has recently been an increase in Islamophobia and attacks on Muslims[22] and protest marches by the British National Party[23] after the murder of Drummer Lee Rigby near the Royal Artillery Barracks in Woolwich.

Alongside this, the rhetoric of 'scroungers' vs 'strivers' and changing public attitudes to those on benefits[24] together with the anti-immigrant rhetoric from politicians[25] and a failure to recognise the benefits of immigration,[26] all combine to produce a fear that the cuts will make the situation of BAME women worse.

The effects of the cuts cannot be viewed in isolation – they are just one part of a jigsaw of issues that affect BAME communities and women. Benefit cuts, cuts to public services and the current Government's rhetoric about immigration, health tourism and welfare scroungers, combined with the weakening of public duties around race equality appear to provide an 'official' sanction for a resurgence of prejudice and racism. As a very visible minority, BAME women experience the effects of both the cuts and the associated issues of prejudice and discrimination that result in increasing their vulnerability and decreasing their access to improved outcomes and life choices.
Harriet Gore, Consultant on Youth and Children's Services[27]

1.4 BAME women in Coventry

According to the 2011 Census 33.4 % of Coventry's population is Black or minority ethnic (including White Irish) up from 21.7% in 2001 Census.[28] The total population of Coventry is 316,960 of which 105,772 is from a BAME background.[29]

Coventry has higher percentage of most BAME ethnic groups than England as a whole.

Population of Coventry by ethnic origin (2011 census) [30]

Ethnicity	Number of people	% of population
White	**234,029**	**73.8**
English/Welsh/Scottish/Northern Irish/British	211,188	66.6
Irish	7,305	2.3
Gypsy or Irish traveller	151	0
Other white	15,385	4.9
Mixed/multiple ethnic group	**8,230**	**2.7**
White and Black Caribbean	3,672	1.2
White and Black African	943	0.3
White and Asian	2,388	0.8
Other mixed	1,227	0.4
Asian/Asian British	**51,598**	**16.3**
Indian	27,751	8.8
Pakistani	9,510	3
Bangladeshi	2,951	0.9
Chinese	3,728	1.2
Other Asian	7,658	2.4
Black/African/Caribbean/Black British	**17,764**	**5.5**
African	12,836	4
Caribbean	3,317	1
Other Black	1,611	0.5
Other Ethnic Group	**5,339**	**1.6**
Arab	2,020	0.6
Any other ethnic group	3,319	1.0

The two wards with the highest BAME population in Coventry, Foleshill (61.1% BAME) and St Michael's (41% BAME) are also the two most deprived wards in Coventry. Based on the 2001 census:

- Average household income is £23,350 in Foleshill and £26,327 in St Michael's compared to a Coventry average of £31,965
- 15.5% of households in Foleshill and 17.6% of households in St Michael's are in overcrowded accommodation, compared to a Coventry average of 8.1%
- Life expectancy in Foleshill is 64.2 for men and 70.7 for women. In St Michael's it is 65.7 for men and 72.7 for women. The Coventry average is 72.2 for men and 78.5 for women.
- 93% of people in Foleshill and 98% of people in St Michael's feel that people from different backgrounds get on well compared to a Coventry average of 91%[31]

1.5 Definitions used

The term "BAME women" as used in this report refers to Black, Asian and Minority Ethnic women with protected characteristics of colour, faith, nationality and ethnic or national origin and who are discriminated against on these grounds.

Our definition includes women of African, Asian, Caribbean, European and Eastern European, Irish, Greek, Turkish, Jewish, Roma and South East Asian descent, mixed heritage as well as refugees and asylum seekers.

We chose the term BAME for this report after considerable discussion between the organisations involved in writing this report. We recognise that there is currently no agreed universal definition used to refer to minority ethnic communities in the UK.

We chose the term BAME as it was the preferred term used by many of the groups and agencies representing or working with people from minority ethnic communities in Coventry.

While we recognise that BAME women are not a homogenous group with the same identity, culture or religion, there are common shared experiences of disadvantage, discrimination and racism which means that examining the impact of the cuts on BAME women as a whole has value, cohesion and meaning. In addition there is the practical consideration that many of the data sources and studies we have used in writing this report include data on BME/BAME communities as a single group, without breaking down figures in more detail. Where figures are broken down and there are significant differences between communities we have reflected this in the report.

1.6 Lack of data

In the process of undertaking the research we have been faced with a serious and significant barrier - the lack of local and national data that is disaggregated (broken down) by gender and ethnicity and disability.

We found it was usually (although not always) possible to find data broken down by gender. It was less easy, but still possible, to find data broken down by ethnicity, although often into broad categories (white and BAME for example). However it was extremely difficult to find data that allowed us to examine the specific experiences and situation of BAME women by combining both gender and ethnicity.

This lack of data creates a problem not just for us, or anyone wishing to research a similar report, but for policy makers and those responsible for equality within public bodies. We know from the research that is available that the experience of BAME women is affected by the combination and intersection of both gender and ethnicity (as well as other characteristics such as age, disability, sexuality and so on). Unless data is broken down by both ethnicity and gender, it is impossible to assess the likely impact of policies, monitor impact in practice or determine where there are gaps in services and therefore determine future provision.

The Fawcett society highlighted this issue as far back as 2005.[32]

> *Thinking continues to be hampered by lack of data which takes into account both ethnicity and gender: it is enormously frustrating that this remains the case. As a result, this report is not and cannot be comprehensive and we point out gaps in evidence throughout the report.*

More recently the All Party Parliamentary Group (APPG) on Race and Community's inquiry into ethnic minority female unemployment with particular focus on Black, Pakistani, Bangladeshi and women concluded.[33]

> *What is also clear is that Black, Pakistani and Bangladeshi women face specific barriers in the labour market which are not solely based on just their gender, or just their ethnicity. These women experience barriers because they are ethnic minority women, and data collection and policy approaches need to acknowledge this. Throughout the report and inquiry it was found that service providers, employers and the Government frequently dealt with women and ethnic minorities as separate entities and undertook little work or data monitoring on these two characteristics combined.*

The term BAME is useful in highlighting shared experiences and disadvantage across communities. But the economic and social position, cultural background and values of different BAME women differ enormously which can mean that public policy may impact on them in very different ways. Using the term BAME can disguise these differences where it is not appropriate and give less priority to the needs of BAME women.

To take just one example from our report, when looking at the increase in unemployment among women in Coventry in the four years to February 2013, we found that the increase in unemployment rates among BAME communities varied from 28% among Asian women to 160% among mixed ethnicity women. The experiences of mixed ethnicity women in particular may be obscured by data that is only broken down into the categories BAME and white. This has specific impact as the demographics of the UK are evolving and there is an increase in the mixed heritage population.

If policies are to be properly targeted and monitored it is essential to be aware of the differences in experiences and realities between ethnic groups. This is particularly vital during a time of public austerity when services are being cut. Accurate data not only shows the differential impact of cuts on particular groups, it can also show where there are pre-existing gaps in services, for example the lack of specialist services for girls and women experiencing Female Genital Mutilation (FGM) in many parts of the country.

During our research we sometimes found that data was available but it was very labour intensive to uncover and at times fees are charged. This places an additional burden of time and cost on individuals and organisations wanting to highlight the ways in which policy may affect BAME women. Since many of the organisations that might wish to carry out this work are already under-funded and overstretched, these additional costs of time and money may mean that research simply does not take place or does not give the detail required to accurately reflect BAME women's experiences and position in society.

1.7 The structure and methodology of this report

This report is split into nine subject chapters, each focusing on a particular issue of concern for BAME women and where there are significant human rights and/or equality impacts. They are all issues where BAME women in Coventry have expressed concerns about the impact of the cuts.

The report therefore focusses primarily on the potential negative impact of the cuts on BAME women.

In some areas (for example social care, council tax benefit, support for advice on benefits) agencies working in Coventry compared the situation in the city favourably with other areas. We have tried to reflect this in our report. At the same time we also recognise that, for the women affected, knowing that they would face more severe cuts in services in, for example, Birmingham does not make dealing with a smaller cut in Coventry any easier.

Each chapter of the study contains the following elements:

- Description of the public sector spending cut for the issue under discussion (for example health, social care etc.).
- Information about the national impact.
- Information about how this cut will affect BAME women in Coventry.
- An analysis of what the human rights and equalities issues of the cuts will be.
- What monitoring should take place in order to assess the on-going impacts of the cuts.

A final chapter of the report presents conclusions on the overall human rights and equality impacts and the potential accountability mechanisms for dealing with these issues.

We hope that this HREIA will act as a blueprint for other organisations across the UK who wish to undertake their own assessments. For details of the methodology used in this study please see Appendix 1.

The women interviewed during the course of this HREIA came from a range of ethnic backgrounds including: African, African Caribbean, Arab, Bangladeshi, Chinese, Eastern European, Indian, Pakistani and Roma women. In total over 180 women were interviewed. This can be broken down into:

- 28 face to face and telephone interviews conducted with representatives of local organisations in Coventry who provide front line services to BAME women and national organisations who have a national perspective on issues relating to BAME women and the cuts.
- 150 women who attended 11 focus groups which we held. Where appropriate we provided interpretative services to reach those women who may not have had a voice otherwise.
- A further 6 interviews were held with individual women not part of focus groups but who approached the researchers themselves to be involved.

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2. The Labour market

2.1 Overview

BAME women in Coventry, particularly those working in the public sector, are being affected by job losses and pay freezes as a result of public spending cuts. Women form the majority of workers in the public sector. Particular groups of BAME women are disproportionately likely to be employed in the public sector putting them at greater risk of job losses. Coventry City Council reports lower rates of redundancy and early retirement among BAME women staff than other groups. But across the public sector in Coventry Unions are reporting a pattern of job losses and competency hearings against BAME women workers which requires further investigation.

Re-employment after redundancy rates are lower for women than for men and there is evidence that the Work Programme is failing to meet the needs of BAME women in Coventry. Cuts to childcare and increased charges for afterschool clubs and to adult social care are also likely to increase the burden of unpaid caring work for women, and is likely to make it harder for them to remain in the workplace.

These cuts may exacerbate an existing pattern of low paid, insecure employment and higher than average rates of economic inactivity among BAME women who already face a variety of barriers to accessing the labour market, including a combination of sexism and racism. However, the decision by Coventry City Council to pay the living wage to all staff could help reduce the pay gap and have a significant impact on low-paid BAME women working at the Council.

This complex situation means that it is very important to monitor the pay gap for BAME women, alongside a range of other comparative employment data. This should be done for public sector organisations across the City, as well as nationally.

2.2 Background – the position of BAME women in the UK labour market

BAME women face multiple disadvantages in attempting to access the labour market for the first time; in re-entering it after a period of unemployment; or in combining caring roles with paid work. BAME women's experiences vary depending on their ethnic group and other factors such as whether they are lone parents, experience language barriers and have knowledge of how systems work in this country. The All Party Parliamentary Group (APPG) on Race and Community's inquiry into ethnic minority female unemployment found that

> *Black, Pakistani and Bangladeshi women face specific barriers in the labour market which are not solely based on just their gender, or just their ethnicity.* [1]

Unemployment is higher among all groups of BAME women than among white women or white men. Unemployment is higher among women of Indian, Pakistani or Bangladeshi origin than among men from the same ethnic group. It is lower among Black women of Caribbean or African origin than among men from the same ethnic group.[2] For women aged 60 and over the percentage of ethnic minority women who are unemployed is more than twice the rate for white women.[3]

Some groups of BAME women, particularly women of Bangladeshi and Pakistani origin, are disproportionately likely to be 'economically inactive', neither in paid work nor registered as unemployed.[4]

BAME women, in particular Black Caribbean, Black African, Pakistani and Bangladeshi women, are more likely to work in the public sector, as can be seen in the table below. This means that they are likely to be disproportionately affected by public sector job cuts.[5]

Percentage working in the public sector				
	Men		Women	
	All	Full-time Only	All	Full-time Only
White British	15.9	15.9	34.0	34.2
Indian	15.9	16.2	29.9	31.3
Pakistani	9.5	10.5	37.2	41.0
Bangladeshi	9.7	11.4	36.4	40.0
Black Caribbean	20.8	21.2	45.6	48.8
Black African	21.3	23.2	33.9	38.3
All	16.1	16.1	34.0	34.5

2.3 The National Picture: unemployment amongst men and women since start of the recession

Although the unemployment rate among men is still higher than the rate among women (8.6% for men and 7.8% for women as at April 2013[6]) the gap is shrinking as unemployment among men is falling. According to a recent report by the Fawcett Society on women and the labour market:

- Since the last three months of 2010, women's unemployment has risen by 12%, putting it at a 25-year-high of just over 1 million, while men's unemployment fell 7% in the same period.
- Almost three times as many women as men have become 'long term' unemployed in the last two and a half years – 103 000 women in comparison to 37 000 men.
- 60% of newly created jobs in the private sector have gone to men.[7]

Comparable data broken down by ethnicity is not published and so it is difficult to determine what the long term unemployment rate is for BAME women since the start of the recession. The unemployment figures only tell part of the story of overall 'underemployment'. In addition to the 2.6 million people who are unemployed there are a further 2.4 million who are defined as 'economically inactive' but want to work and 1.4 million working part time because they cannot find full time work.[8]

2.4 What is happening in Coventry?

Budget cuts are continuing to lead to public sector job losses and pay freezes in Coventry. In Coventry public sector job losses include:

- In December 2012 the Chief Executive of Coventry City Council wrote to all employees 'We have already lost over 700 posts in the last two voluntary redundancy rounds and we need to look to lose at least the same number again.'[9]
- Coventry and Warwickshire Partnership NHS Trust must lose nearly 550 posts - almost 20 % of total staffing by 2015.[10]
- Warwickshire County Council expects 1,800 jobs losses from a workforce of 18,000.[11]
- Nationally the Department for Education is to lose 1000 jobs.[12] At the time of writing it is not known how many job losses will be at the Earlsdon Park site in Coventry.

Jobs in the voluntary sector have also been lost as a result of funding cuts, changes to commissioning practices and changes to legal aid (see chapter on Voluntary Organisations). Public sector workers earning more than £21,000 had their pay frozen for two years from 2010. From 2012 public sector pay increases were frozen at 1% up to 2015 – an increase lower than inflation.[13]

Despite the cuts Coventry City Council has committed to pay the living wage of £7.45 an hour to all staff. This will particularly benefit low paid women and in particular BAME women who are more likely to be in low paid work.[14]

Women in Coventry will also be hit by cuts to childcare funding:

- Childcare tax credit has been cut to cover 70% of childcare costs rather than the previous 80% (see chapter on Incomes and Poverty).
- Coventry City Council has closed six children's centres.[15]
- Cuts to school budgets have led to a reduction in after school and holiday club provision.[16]

2.5 How does this affect BAME women in Coventry?

2.5.1 Increased Unemployment

Unemployment among most groups of BAME women in Coventry has increased significantly in the last four years. Between February 2009 and February 2013 the number of women in Coventry claiming Job Seekers Allowance (JSA) increased by 38%. Unemployment among BAME women in Coventry increased by 74.4% between 2009 and 2013. There were significant differences between ethnic groups.[17]

Ethnicity	Female JSA claimants Feb 2009	Female JSA claimants Feb 2013	Percentage increase
Black/Black British African/Caribbean	160	300	87.5%
Asian/Asian British/Indian/Bangladeshi/ Pakistani	300	385	28.3%
Mixed White+Black Caribbean/ Mixed White+Black African/Mixed White+Asian	50	130	160%
Non British and Irish	55	205	272.7%
Chinese and Chinese other ethnic group and Other ethnic group	80	105	31.3%
White British	1505	1965	31%

The unemployment rate for British Asian women hides further differences between women of Indian origin, whose unemployment rate rose slightly over the period before falling back to the same rate as 2009, while unemployment among women of Bangladeshi origin doubled and unemployment among women of Pakistani origin almost doubled. Similarly, for Black or Black African women the rate more than doubled and for Black and Black Caribbean women the unemployment rose by 71%.

These job cuts take place against an already difficult situation for BAME women in the labour market. BAME women in Coventry are less likely to be employed than white women, although the employment rate varies with Pakistani/ Bangladeshi and mixed ethnic group women particularly likely not to be employed.[18]

In addition, national research by the Fawcett Society showed that BAME women are disproportionately represented in routine or semi routine and insecure temporary jobs.[19]

2.5.2 Public Sector Job Cuts

As previous reports have shown, women have been the hardest hit by public sector job cuts.[20] In the West Midlands 69.3% of jobs lost were held by women.[21] BAME women are more likely to be employed in the public sector and are therefore disproportionately likely to be affected by public sector job cuts. Some groups of women are particularly likely to be hit – 45.6% of Black Caribbean women for example work in the public sector.

Coventry City Council data shows women make up approximately 78% of Coventry City Council's workforce with BAME women representing 10.22% of the total workforce. Of the female workforce 13.13% are from an ethnic minority background.[22] 79% of employees of University Hospitals Coventry and Warwickshire are women, 27% of employees are BAME.[23] Figures from the Census 2011 indicate that 31.1 % of Coventry's population is BAME.[24]

2.5.2.1 The National Level

We were unable to find data which detailed the number of public sector job losses affecting BAME women nationally. However, the frequency with which unions comment on their observations on BAME women losing jobs is worth highlighting.

UNITE have commented on job losses in the public sector and their impact on black women:

> *Our members are telling us that many black women are losing their jobs in the public sector, as they work on the frontline, particularly in the NHS and local government, where jobs are going first and fast.*[25]

There are also concerns about the way in which cuts to jobs are being handled. A national PCS union official commented on ways of making cuts to staffing:

> [They are] *trying to get people out of the door in any way they can – something that has affected the disabled and those with recurring illnesses. They use capability procedures and take a harsher line. They manage people out of the organisation. BAME women are disproportionately impacted; women themselves are not disproportionately impacted. Women alone are not being managed out… The patterns of those affected are disabled workers and BAME women.*
> Zita Holbourne - member of PCS National Executive Committee.[26]

The same official raised concerns about the disproportionate number of BAME women seeking help from her union:

> *A disproportionate number of BAME women were seeking help from the union. Individually they didn't say they were a victim of gender or race discrimination. They did not necessarily realise the institutional discrimination but the patterns of the cases demonstrated the barriers women were encountering.*
> Zita Holbourne – member of PCS National Executive Committee.[27]

2.5.2.2 The Coventry Situation

We have not managed to obtain a breakdown of all public sector job losses in Coventry by gender and ethnicity.

Across a range of public sector employers in Coventry both unions and individual workers reported a pattern of job losses among BAME women in particular. One interviewee described the situation she observed:

> *In my area alone all the deleted posts were held by BAME Officers. In total we are looking at 9 BAME Officers who have been affected and the way it has been done is appalling.*[28]

Another participant stated:

> *On my floor there are a total of 11 BME [female] officers and 7 of those were affected by the review either by deletion or offered a lower graded position… I feel victimised, devalued, dis- empowered, angry and disgruntled.*[29]

Unions in Coventry are also finding that they are dealing with more cases from BAME women members:

> *Up until now we haven't monitored case work. But we are starting to notice a pattern. This is similar to the national picture reported by other caseworkers. Asian women, in particular, are being affected.*
> Nicky Downes, Equalities Officer at NUT.[30]

Coventry City Council figures for early retirement and voluntary redundancy do not show a disproportionate impact on BAME Council workers:

The percentage of Early Retirement or Voluntary Redundancy leavers from a BME background that are female is less than the percentage of BME females in the workforce. Council data shows that BME women make up 10.22% of the total workforce but only 7.3% of all Early Retirement or Voluntary Redundancies. The percentage of Early Retirement or Voluntary Redundancy leavers that are BME (10.59%) is again less than the percentage of females in the workforce that are BME (13.3%). [31]

The Council also pointed out that between 2010/11 and 2011/12 there was an increase in the proportion of the City Council's workforce that is BAME from 12.5 to 12.7%.[32]

There is a significant difference of opinion between Coventry City Council and unions representing public sector workers in Coventry about the impact of job losses on BAME women. Union officials have reported that there have been a series of reviews resulting 'in new staff structures, which include job down grades, the movement of staff to another job within CCC and in some cases a person losing their job'. They argue that it is important to distinguish between jobs lost through early retirement or voluntary redundancy and compulsory job losses as a result of restructuring.[33] Coventry City Council does not produce separate figures for voluntary redundancy, early retirement and compulsory redundancy broken down by gender and ethnicity. However they state that:

There is no evidence to suggest that any one group with a protected characteristic (e.g. BME woman) have been disproportionately affected by any of the Council's job reduction or restructure processes.[34]

Unions also argue that Equality Impact Assessments have not always been carried out on the impact of restructuring programmes on employment, or have not been carried out until after the review has been completed:[35] However, Council representatives argue that 'extensive work is going on to direct and support any service reviews to undertake EIAs'[36].

Public Sector bodies in Coventry monitor and report on the profile of their workforce in terms of gender, ethnicity, disability and other equality characteristics. But it is important that data on employment patterns in the public sector are monitored city-wide and nationally across all equalities groups so that the Government can identify where spending cuts are having an impact on BAME women's employment. Also there is a need to distinguish between different types of job losses (e.g. voluntary and compulsory redundancies).

2.6 Barriers to finding work for BAME Women

Barriers to BAME women accessing the labour market need to be taken seriously. They may lead to BAME women feeling that Job Centres and other forms of support are not accessible to them and either remain economically inactive as a result or take up less desirable forms of work. Pragna Patel of the Southall Black Sisters gives a perspective of BAME women's employment:

BAME women often tend to find jobs by word of mouth and it becomes self-perpetuating because these women are under the radar; an undocumented labour force. They don't even access the job centres, treated as casual labour, lowly paid, without pensions and have no rights.[37]

Below we consider a number of barriers to finding work for BAME women that were identified by women we interviewed.

2.6.1 Language Barriers

Many of the women in the focus groups cited language as a barrier to them finding work. Focus group participants explained that it was more difficult to attend ESOL classes as they were no longer available locally and with the increase in bus fares they cannot afford to travel to venues that are further away.

Language barriers can also prevent women from understanding how decisions relating to redundancy affect them. One Unite official explained that BAME women who did not have English as a first language were disadvantaged when it came to consultation over restructuring and potential redundancies:

They were not clear about what the impacts are and decisions that are detrimental to them, for example the ABC consultation - the letter was not in different languages.
Pat Seaman – UNITE official.[38]

Language barriers can also be a problem for women when claiming unemployment benefits.

We have concerns for people that are finding themselves being sanctioned from JSA without knowing what they have done wrong and are not able to come to us. What if you don't understand the language? There are strict appointment rules and sanctions if you do not attend. You have to make all the applications suggested.
Ed Hodson, Grants and Policy Officer, Coventry CAB[39]

This is likely to increase with the move to online and telephone applications.

> *Another barrier is that you won't be able to walk into a Job Centre. You will have to phone or go online.*
> Ed Hodson, Grants and Policy Officer, Coventry CAB[40]

2.6.2 Online Applications

The advent of online applications for jobs presents problems for those BAME women who are not able to read and write English fluently enough to be able to use technology to make applications for jobs.

> *A lot of women have been told they've got to apply for x number of jobs per week and to apply for jobs online and our service users don't know how to do it. Furthermore, the jobs are unsuitable for these woman's skills and the experiences they have.*
> Christine McNaught, CEO, Foleshill Women's Training[41]

2.6.3 Childcare

Cuts to childcare provision are a major barrier to women finding work. Cuts to childcare will have an impact on all working parents, but will cause particular problems for lone parents who do not have another parent with whom to share childcare.

Nationally, 92% of lone parents are women.[42] The 2007 annual survey (Families and Children Study) investigated the situation of British families with dependent children and found families with a black (African, Caribbean or black British) mother were more likely than families with a white mother to be lone parents (53 per cent compared with 25 per cent).[43] Furthermore, 65% of African Caribbean children live in one parent families and are most likely to be raised by their mother.[44]

In Coventry women interviewed in the focus groups raised a number of impacts as a result of cuts to childcare provision:

- The closure of crèche facilities has created longer waiting lists for those that are open.
- The cost of childcare for parents claiming childcare tax credit will increase.

> *I can't afford paying for childcare provision because the cost is very high. I feel isolated.*[45]

Lack of childcare was a particular problem for women who were being pressured by the Job Centre to look for work some distance away. JSA claimants are expected to seek work within 90 minutes travel time from their homes, unless they have caring responsibilities or a physical or mental condition.[46]

There is evidence at a national level that women with children are not made aware of the exemption from the 90 minute rule for people with childcare responsibilities.[47] Our research in Coventry suggests that this has also happened locally.

> *Women are very distressed because they have been told they can potentially have a job travelling up to 90 minutes each way. For women it is difficult to find a part time job and look after children and be able to do the job.*
> Christine McNaught, CEO, Foleshill Women's Training[48]

2.7 The Work Programme

The Work Programme is a scheme set up by the Government to provide support, work experience and training for up to 2 years to help people find and stay in work.

The failure of the Work Programme to meet the specific needs of BAME women has been recognised nationally. The All Party Parliamentary Group (APPG) on Race and Community's inquiry into ethnic minority female unemployment with particular focus on Black, Pakistani, Bangladeshi women have recommended that:

> *Given the larger numbers of older women from Pakistani and Bangladeshi backgrounds entering the workplace for the first time, Job Centre Plus should be clear on how they are meeting the specific needs of these women, particularly taking into account cultural and language needs.*[49]

Department of Work and Pensions data on the impact of the work programme in Coventry suggests that so far it has not proved successful in finding work for some BAME women[50]. In the year to July 2012:

- 1290 white women were referred to the work programme as were 490 BAME women.
- 60 white women found jobs (4.6%)
- 10 Asian/Asian British women (out of 210 referrals) found jobs (3.4%)
- No women from other BAME groups (out of 280) found jobs[51]

The Work Programme has had a low success rate for women from all ethnic groups. However, both the Coventry data and research from the All Party Parliamentary Group on Race and Community suggest that the work programme is disproportionately failing BAME women. This needs to be investigated at a local and national level and action taken to correct problems identified.

2.8 Discrimination in the Labour market

BAME women may face difficulties in finding jobs due to discrimination in the labour market. Collette Cork-Hurst, Unite National Officer for Equalities, has stated:

> *Unfortunately, discrimination against black workers at work continues to blight today's labour market. Black, Asian and ethnic minority workers find it harder to find decent employment and sadly, too many then encounter discrimination once at work.*[52]

Workplace discrimination was mentioned by several women we interviewed.

> *There will be more people applying for jobs and I still believe colour plays a part in it…If you are a woman it has an impact. There are the boys' networks. If you look at race it has an impact and as a woman it is a double impact. They will give you lots of reasons but you know there is another reason. I am 59 and I am a woman. Then on top of that I am Asian; is anyone going to give me a job?*
> Manager – Health Inequalities Team[53]

> *There are skilled, intelligent women who have a lot to offer. There is always underlying discrimination. You get past the barrier of being a woman and then you have the fight of them looking at you as BAME.*
> Viv Brosnahan – Community Action Trainer, CEMAP[54]

Some women complained about the failure of managers to address the discrimination that BAME women face but felt that if they spoke out they could also be targeted.

There was a strong sense of injustice regarding the discrimination and lack of access to the labour market, where one woman who attended a focus group summed up as:

> *British jobs for British people!*[55]

These allegations of discrimination in the workplace suggest the need for more in-depth and comprehensive analysis of the situation.

2.9 Relationship between part time work and the benefits system

Some groups of BAME women are being hit by changes to the tax credit system. For example, Coventry CAB has raised the issue of Roma women whose hours of work are uncertain but whose benefit entitlements may be based on 'contracted' hours even if these are different to their actual hours worked.

> *Roma travellers are often able to get low skilled and low paid work only. Many women are on contract work, part time work or uncertain work. It is advocated by the Government that there will be real time adjustment to benefits which takes contracted work into account. We believe in reality this won't work especially as agencies are unlikely to keep those records that are required.*
> Ed Hodson, Grants and Policy Officer, Coventry CAB[56]

CAB also raised the issue of the requirement placed on couples to work at least 24 hours between them in order to qualify for Working Tax Credit:

> *There are sanctions for people working part time if you can't prove that you are increasing your hours. To get working tax credit as a couple you have to work 24 hours. You can't get working tax credit if you can't up your hours if you are a couple and work isn't always out there.*
> Ed Hodson, Grants and Policy Officer, Coventry CAB[57]

2.10 Impact of Unemployment

The following is one focus group participant's experience paraphrased here. It shows the impact on the lives of BAME women and their families as a result of problems finding work.

> *One woman interviewee spoke of her frustration with the situation of finding employment. Her income support was stopped because her children were now old enough and therefore it was deemed she could go to work. Her benefits were changed to jobseekers allowance. However, at the same time, there was an error to do with her housing benefit. She was required to attend regular interviews at the Job Centre and prove that she is looking for work. However, as she spent many years caring for her children, she cannot speak English and so has no work experience and few skills. To attend interviews, her daughter books time off work to go with her to act as an interpreter as there are no interpreters at the Job Centre. She also struggles to find the bus fare to attend the Job Centre as bus fares are rising and she is required to attend more frequently. She has not been successful in obtaining any job interviews but if she did she felt she would be unable to cope with the interview because of the language barrier. As a result she is suffering from depression and has been put onto high level anti-depressants.*[58]

Women in the focus groups also described the devastating impact that redundancy has had on their lives:

As a result of the cuts I have been made redundant… the whole experience has been debilitating really. The difficulties continued as I had to support my team who were also coming to terms with my role being 'chopped' and their own roles and responsibilities being changed.[59]

I had gone through the same experience only 15 months before and that was a truly a horrible experience and the thought of going through all that again did become very stressful. I ended up having a couple of weeks off. As I have only been with the council for 3 years the redundancy payment isn't great, so, unless I'm able to get another job within a couple of months I will be facing some financial difficulties.[60]

2.11 Increasing Pay Gap

Women working full time and living in Coventry earn on average 20% less than men working full time, a pay gap that is larger than the national average.[61] However, between 2008 and 2011 women working full time saw a 12% increase in their annual median gross pay while men working full time saw no increase.[62]

National research by Unite shows there is a 15% pay gap between BAME workers and their white colleagues.[63] Although we were unable to find corresponding data for Coventry there is no reason to believe that Coventry is not in line with the national trend.

In addition, workers earning the lowest 10% of wages in the public sector (the majority of whom are women) earn 16% more than their counterparts in the private sector. As these low paid women lose public sector jobs and enter the private sector their pay is likely to fall.[64] However Coventry City Council's commitment to pay the living wage should have a positive impact on the pay gap as most low paid workers are women.

2.12 What are the Human Rights and Equalities Issues?

Employment is central to BAME women's long term financial independence. The pay gap, combined with time out of the workplace for caring responsibilities, means that women are less able to save than men and therefore more likely to suffer poverty in old age.[65]

BAME Women in Coventry are less likely than the national average to be in paid work and suffer a larger pay gap. If women who lose jobs in the public sector are unable to find work in the private sector this will lead to increased female unemployment.

Women working part time in the public sector may have to take a pay cut in order to find part time work in the private sector. This is likely to exacerbate overall inequality in Coventry between men and women. It may also push some women into poverty which can have an impact on their human rights (see Poverty and Incomes chapter for details). However, the decision by Coventry City Council to pay the living wage could help reduce the pay gap. This complex situation means that it is very important to monitor the pay gap for BAME women.

There is a particular need to investigate and take action where there may be a disproportionate impact of job cuts or a failure of schemes aimed at getting people back into work (e.g. the Work Programme).

2.13 Monitoring Required

Individual public sector bodies monitor and publish information about their workforce by gender and ethnicity as well as other equality characteristics, although public reports sometimes only provide information broken down by either gender or ethnicity. This data could provide important insights into the impact of the spending cuts in terms of the employment and pay of BAME women city-wide and across the country if it was collated and published at a local/national level. This will allow assessment of the extent to which existing inequalities in pay, promotion and jobs are increasing for BAME women.

Monitoring redundancies by ethnicity, as well as gender and ethnicity combined, should be encouraged by Government as best practice for all employers.

In order to assess the actual human rights and equalities impact of job losses, pay freezes and cuts to childcare the following areas should be monitored:

- Level of job losses amongst BAME women and white women and men in Coventry.
- Monitoring of redundancies and disciplinary action among BAME women in Coventry compared to other groups.
- Overall employment rates among BAME women and men in Coventry.
- Pay gap between BAME women and white women and men in Coventry.
- Childcare provision in Coventry and how it is being accessed by, and is accessible to, different ethnic groups.
- ESOL provision and take up by BAME women in Coventry and any changes that are occurring.

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3. Housing

3.1 Overview

There have been significant changes to Housing Benefit (HB) and Local Housing Allowance (LHA) with further changes taking effect in 2013. These reduce the level of benefit that can be claimed. Tenants will have to move to cheaper accommodation or make up the difference themselves from other income.

These changes are already having, and will continue to have, a disproportionate impact on women from BAME communities. Our previous reports have shown how women in general are disproportionately affected by the changes to HB and LHA.[1] Coventry City Council are attempting to mitigate some of these impacts. However, BAME communities are disproportionately impacted as they contain a higher proportion of households on low incomes and are more likely to require accommodation for larger families. The Government's own equality impact assessment on the total cap on benefits that a household can claim estimates that 'of the households likely to be affected by the cap approximately 40% will contain somebody who is from an ethnic minority'.[2]

In addition, there are particular housing issues facing some groups of BAME women which mean that the cuts may have a disproportionate effect on them. Particular attention needs to be paid to monitoring the on-going impact of 'non-dependent deductions' on BAME women, as well as monitoring overcrowding in BAME households.

3.1 The Changes

The key changes that are affecting or are likely to affect BAME women in Coventry are:

- Since 2011 LHA only covers rents up to the bottom 30% of rents locally. The maximum level of LHA payable per week in Coventry from April 2013 is:[3]

Shared accommodation -	£64.39
One bedroom -	£91.15
Two bedrooms -	£106.13
Three bedrooms -	£126.92
Four bedrooms-	£167.31

- The maximum LHA that can be claimed is the rate for a four bedroom property, regardless of the number of bedrooms a property has.
- Since January 2012 people under 35 claiming LHA are limited to the costs of a room in shared accommodation, rather than a one bedroom property (prior to 2012 the age limit was 25).
- From April 2013 people claiming Housing Benefit (HB) who are deemed to be living in properties larger than their needs will face a cut in housing benefit (the so called 'bedroom tax'). The reductions are:
  - 14% cut in HB if there is under occupancy by one bedroom.
  - 25% cut in HB if there is under occupancy by two or more bedrooms.

The Government have announced exemptions for those families with disabled children, foster carers and for those families whose children are in the military.[4]

- Non-dependent deductions – Housing Benefit is reduced at source for claimants where people living in the same house are over 18 and considered to be non-dependent, such as an adult son or daughter. In 2011 non-dependant deductions were increased by approximately 27%, then by 22% in 2012; and by nearly 19% in 2013.[5]

Discretionary Housing Payments
Each council is given funds to make payments to people who qualify for housing benefit or council tax benefit but are having difficulties paying their rent or council tax.[6] People with adaptations to their homes or those with long term medical conditions may receive funds from the Discretionary Housing Payments. Coventry will receive £800,000 in 2013/14, however the City Council states that 'with limited funding the DHP pot can only help a small proportion of those impacted by the changes.[7] The National Housing Federation has calculated that if every single person who claims Disability Living Allowance received an equal portion of the fund then each would receive only £2.51 per week, which is significantly less than the average loss of housing benefit of £14 per week.[8] This does not include anyone else who might need help.

Longer Term Problem of Inadequacy of Housing Benefit and Local Housing Allowance in Coventry
From April 2013 Housing Benefit and Local Housing Allowance will increase in line with the Consumer Prices Index (CPI) and by 1% in April 2014 and 2015 rather than on the basis of local rents.[9] The CPI has increased at a far slower rate than rents in recent years. In the ten years from 1997/98 to 2007/08 the CPI rose by 20%. During the same ten year period median rents increased by almost 70%.[10] Over time it is highly likely that the actual rate of increase in local rents will greatly outstrip the increase in LHA meaning that the number of properties available to people dependant on Local Housing Allowance will reduce.

There is a distinction between Local Housing Allowance and Housing Benefit. Local Housing Allowance was introduced in 2008 and replaces housing benefit for tenants in private rented accommodation. Housing Benefit is paid to tenants in social housing such as housing associations and council housing. Both are means tested benefits available to tenants in work as well as people who are unemployed, disabled, carers or retired.

3.2 Impact on BAME women in Coventry

3.2.1 Impact of the Cuts and Changes to Housing Benefit and Local Housing Allowance

In Coventry 39,708 households were receiving Housing Benefit/Local Housing Allowance and/or Council Tax Benefit in May 2013. (26,816 of these were working age).[11]

- 3,066 working age households were receiving a reduced amount of Housing Benefit (losing an average of £14.12 per week).
- 206 were single adults (no dependents, no non-dependents) aged 25-34 and therefore affected by the extension of the shared room rate. They are now only entitled to £63 a week, the limit for a room in shared accommodation.[12]

Research by Sheffield Hallam University estimates that 9,200 households in Coventry will be affected by Local Housing Allowance changes with a total loss of £13.21 million.[13]

The research does not break down these figures by gender and ethnicity. However, national data shows that most of the changes to Housing Benefits are more likely to negatively impact BAME claimants.[14] People from ethnic minority communities are more likely to live in low income households[15] and are therefore more likely to need to claim housing benefit. The Government's own Equality Impact Assessment of the benefit cap, of which housing benefit is likely to be the largest component, states that 40% of households affected will have a member who is BAME.[16]

Example of impact

A family of three generations with two children (one male and one female) under 10 years of age, making a claim in December 2012, in Coventry would be entitled to a weekly payment of LHA of £126.92 per week for a 3 bedroom property (£550 per month).[17] However, the average rent for a 3 bedroom property in Coventry is £726 a month[18] leaving a shortfall of over £175 a month.

The four bedroom limit for LHA will disproportionately affect large families.[19] BAME families tend to be larger and more likely to live in multi-generational households.[20] In Coventry the two wards with the highest concentration of BAME families have an average household size larger than the average for Coventry, or for England as a whole.[21]

Example of impact

A family with three children, parents and grandparents living in the same house in Coventry would face a shortfall of £467 per month between the available LHA (£167.31 per week, the maximum for four bedrooms) and the average local rent of £1193 per calendar month for a five bedroom property.[22]

3.2.2 Impact of Non-dependent Deductions

There is an assumption that people living in a house, who are not dependents of the tenant liable for rent, will pay something towards the rent. This has a particular impact on extended families, and in particular where there are adult children. Difficulties and family conflict can arise in these situations where, as a result of cultural behaviours, rent from adult children or older parents is not requested.

The Government's own equality impact assessment states:

A higher proportion of ethnic minorities appear to be affected by the measure, both in terms of customers and the non-dependants themselves,… and this implies a potential risk that this group may be disproportionately affected. This may, in part, reflect the differences in living arrangements across ethnic groups, such as extended families.[23]

The size of the uprating has a significant impact on BAME women who may not have financial equity within the family.

The initial large uprating went largely ignored as a public issue but for any tenant with extended family living in their house/flat this was a significant blow to their housing benefit causing, potentially, family stress and breakdown where contributions were demanded when attempts were made to absorb these reductions in HB. This was, arguably, just as big a blow to housing benefit recipients as the bedroom tax is now. Ed Hodson – Citizens Advice Bureau, Coventry.[24]

3.2.3 The Bedroom Tax

The 'bedroom tax' is estimated to affect 3,500 households in Coventry, costing a total of £2.34 million a year.[25]

The families likely to be affected by the 'bedroom tax' include:

- Separated parents who share the care of their children and who may have been allocated an extra bedroom to reflect this. Benefit rules mean that there must be a designated 'main carer' for children (who receives the extra benefit)

- Couples who use their 'spare' bedroom when recovering from an illness or operation
- Parents whose children visit but are not part of the household
- Disabled people including people living in adapted or specially designed properties.[26]

As households from BAME communities tend to be larger and less likely to be 'under-occupying' than white families this measure is unlikely to have a disproportionate impact on BAME families overall.[27]

Particular impact on disabled BAME women

Disabled people who need an extra bedroom for special medical equipment, or live in houses that have been specially adapted, will be badly affected by the bedroom tax. Although the Government has announced Discretionary Housing Payments to support people who have had adaptions to their home the amount available is unlikely to cover the number of people who might need to claim.[28] The campaign group Spartacus argue that it is well established that disabled people experience higher living costs as a result of their disability but the Government have not recognised the needs of disabled people in relation to under occupancy.[29]

Disabled BAME women are likely to be badly affected by the bedroom tax as they are already less likely to claim the benefits to which they are entitled and face a number of language and other barriers to accessing benefits and services (see the Incomes and Poverty and Health chapters for further details).

3.2.4 Impact of forced moves

As a result of all of the above cuts to housing benefit, BAME women may be forced to move house or area. This will have a financial cost, which may be difficult for poorer BAME women to find. In addition, there are 'invisible' impacts of moving. Women will lose their support networks with families and friends, especially if they are reliant on informal arrangements for childcare with family. For other women who are carers for elderly relatives having to move away will mean that they incur additional transport costs in order to continue caring for relatives. There is a risk of increased isolation both for women that move and those women who may have been cared for by younger relatives.

Voluntary organisations such as Foleshill Women's Training (located in Foleshill) will be more difficult to access for women who have to move away from the area and will incur travel costs.

3.2.5 Fear of Racism

Many of the BAME women in focus groups we carried out for the report highlighted their fear of racism if they were forced to move to neighbourhoods where they have never lived or where there are very few residents from ethnic minority communities.

> *One of my relatives has five children but they are struggling to find a bigger house. They have only been offered properties in other areas. They do not want to move to another area because they are scared that they will suffer racism in English areas of the city. They said that the local authority and housing associations do not understand their specific needs and they often get angry when the family turn down properties*[30]

3.2.6 Overcrowding

BAME communities in Coventry are concentrated in poorer parts of the city. In Coventry the two most deprived areas are Foleshill and St Michaels, both of which have the highest concentration of BAME communities, 61% and 44% respectively. These areas are also among the most overcrowded wards of the city.[31]

There is a shortage of three and four bedroom properties in Coventry. Coventry City Council estimate the need for three or more bedroomed houses represents 61% of all housing needs in the city.[32]

The problem of overcrowding is likely to get worse as a result of the benefits cap. This may lead to overcrowded and unhealthy conditions, which can have a long term impact on health and wellbeing of BAME women and their children. However, for some women living in an over-crowded situation is preferable to moving to any area where they do not feel safe. One worker at an agency working with BAME women explained:

> *Many families who are overcrowded prefer to stay where they are, and with their community, because it is where they feel safe. They fear that if they move away they will end up isolated.*[33]

3.3 What are the Human Rights and Equalities Impacts?

People from ethnic minority communities are more likely to live in low income households, and so taken together with the other cuts and changes to welfare benefits (see Incomes and Poverty Chapter), cuts and changes to housing benefits are likely to lead to increased poverty among BAME women.

Any increased pressure on budgets will have a disproportionate impact on these women because women often act as the 'shock absorbers' of poverty, cutting back on their own consumption (including of food) in order to balance family budgets.[34] Increased pressures on family budgets as a result of benefit reductions can also lead to human rights abuses for women such as increases in domestic violence as well as inability to access adequate food. For more on the links between poverty and human rights see the chapter on Incomes and Poverty.

Problems in relation to overcrowding also need to be carefully monitored. Overcrowding can have impacts on the right to health and right to privacy of BAME women.

Action also needs to be taken to ensure that BAME women are not at risk of increased racism as a result of requirements to move house.

3.4 Monitoring required

In order to assess the actual human rights and equalities impact of all these changes the following areas should be monitored:

- The impact of changes to LHA (and other benefits) to the household budgets of BAME women and in particular vulnerable and disadvantaged groups.
- The gap between actual rents and the amount paid by LHA and how this changes over time.
- The quantity of private rented accommodation available in different parts of Coventry at LHA rates or below.
- Instances of overcrowding in housing in Coventry and their impact on health outcomes of occupants.
- Any racism encountered by BAME households who are forced to move house into new areas of the city.

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4. Incomes and Poverty

4.1 Overview

The annual cost to people in Coventry of cuts to benefits and tax credits has been estimated as £112 million.[1] Of this, the cost to women will be approximately £76 million.[2]

Coventry City Council is maintaining the current level of support for Council Tax Benefit, guaranteed for one year, despite a 10% reduction in their budget from the national Government. This decision will benefit BAME women. But there are concerns that BAME women in Coventry may lose out as a result of cuts and changes to a range of other benefits described below. The impact of these changes on individual BAME women in Coventry will depend on their situation.

For some women the combined impact of changes to benefits and tax credits could lead to a significant loss of income, pushing some of those women into poverty. Among BAME women, lone parents, disabled women and carers are likely to be particularly badly hit. The move to Universal Credit also raises serious concerns that some BAME women will be left without access to an independent income.

BAME women are disproportionately likely to be living in poverty and are therefore disproportionately affected by these cuts. Around two-fifths of people from ethnic minorities live in low-income households, twice the rate for white people.[3] In addition, some BAME women will be particularly vulnerable to changes to the benefits system due to language barriers, caring responsibilities (for children and other relatives) and lack of control over finances within the family.

Research for this chapter has uncovered significant gaps in the data about the specific impact of welfare benefit cuts and changes on BAME women. Some projections look at impact by gender, others by ethnicity, but it has been very difficult to obtain quantitative data on the impact of the cuts and changes on BAME women. Coventry City Council is starting to collect data of the impact of the welfare benefit cuts. However, there are gaps in the data that is available.

In writing this chapter we have therefore had to make some assumptions about the likely impact of the cuts on BAME women, based on what data exists and on qualitative research with organisations working with, and for, BAME women as well as on interviews and focus groups with BAME women themselves.

This chapter covers cuts to the welfare benefit system. However, the impact of the changes to housing benefit are covered in the Housing chapter.

Action to mitigate the impact of benefit cuts in Coventry

The Coventry Partnership is working together with a range of organisations, including the Council, to identify and support individuals who are affected by the changes arising from the Welfare Reform Act. Activities include:

- Pop-up shops to provide benefits advice and raise awareness of the changes;
- Road-shows aimed at disabled people to provide advice and raise awareness;
- Visits to individuals affected by the benefits cap;
- Help with moving costs;
- Increasing free access to internet time;
- Working with credit unions to support customers to get an account;
- Community Support Grant Scheme to help vulnerable people.

As part of this work, the Partnership has set up an Evaluation Group which aims to share data and analysis to develop a picture of which individuals and groups are adversely affected by the changes; this data will be used to target future activities. In addition, research has been commissioned into the impact of the recession and welfare reforms on the health of the local population. The aim is to identify 'at risk' groups and use this information to take action to mitigate against the negative effects.[4]

4.2 Benefits – What is Changing and When?

Each of the major changes that affect BAME women in Coventry are set out briefly in this section and then considered in detail in section 4.4 below.

Benefit Cap

From April 2013 there will be a cap on the combined total of benefits that working-age people can receive amounting to:

- £500 per week for couples and lone parents regardless of the number of children they have.
- £350 per week for single adults with no children or those whose children do not live with them.

The Benefit Cap is being phased in: initially in 4 London boroughs and then rolled out nationally by September 2013.

Benefits and Tax Credit Rates
The rates for benefits and tax credits will be raised by 1% up until April 2015 rather than being increased in line with the Consumer Prices Index (CPI).

Council Tax Benefit
Council Tax Benefit is to be replaced by localised support for Council Tax affecting people of working-age who currently receive Council Tax Benefit.

Disability Living Allowance (DLA)
DLA will begin to be replaced by Personal Independence Payment (PIP) for people of working age from 8 April 2013. All working-age claimants already claiming DLA will eventually be reassessed for PIP. The Government's aim is to cut overall costs by 20%.[5]

Employment Support Allowance
Employment Support Allowance has been introduced and replaces a number of benefits for disabled people. Claimants are given medical assessments. If they qualify for ESA they will be put into one of two groups, the work related activity group or the support group, based on their readiness for work and the support they need.[6]

Social Fund
Crisis loan alignment payments and other crisis loans paid when claimants are waiting for their benefit claims to be processed will be replaced by a new national scheme of Short Term Advances administered by the Department for Work and Pensions.

Community Care Grants and Crisis Loans
Community care grants and crisis loans for general living expenses (including rent in advance) will be abolished and replaced by new support grants with administration undertaken by local councils.

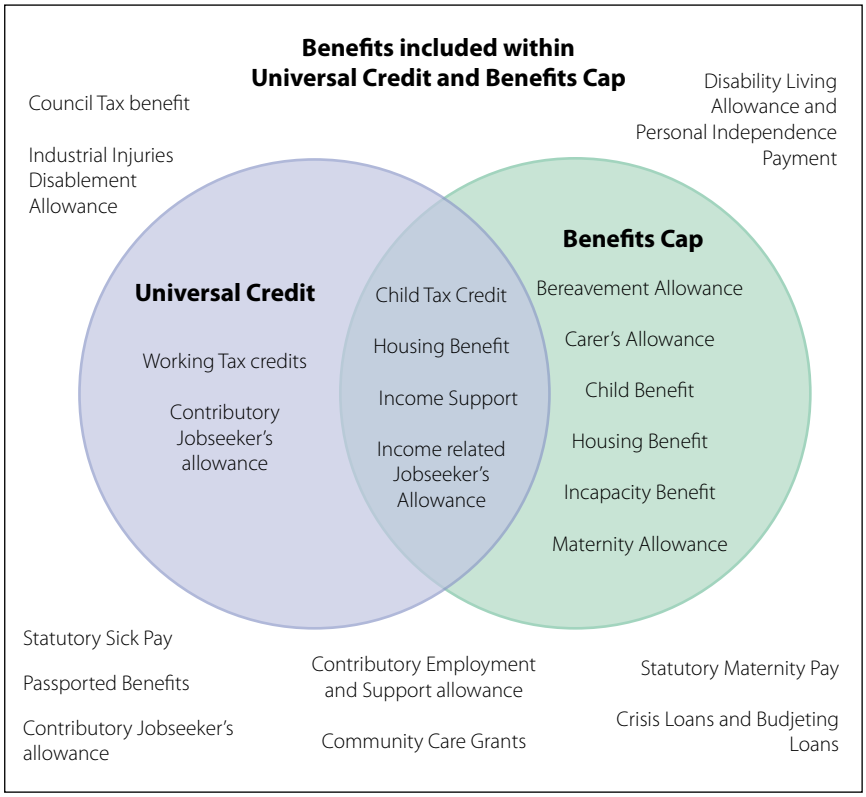
Child Benefit
Child benefit rates have been frozen for three years from 2011. From 7 January 2013 households where someone has an income of over £50,000 will lose child benefit at a rate of 1% for every £100 earned over £50,000.

Tax Credits
There have been a series of cuts to tax credits including cuts to tax credits for families earning over £40,000. From April 2013 a £5,000 rise in income will trigger a re-assessment of tax credits (previously it was £10,000).

Increased sanctions
In addition to the cuts to benefits, increased levels of sanctions are being imposed on claimants who fail to comply with the requirements of the Job Centre, which can result in the loss of benefits.

Universal Credit
The Government is introducing Universal Credit, which will be a new, means-tested, single payment for people who are looking for work or on a low income up to the age when people qualify for pension credit. The payment will be made monthly, directly to a nominated bank account and to one person within the household.

Universal Credit and the Benefits Cap – What Do They Cover?
The diagram below shows which benefits are included in the Benefits Cap, which are within Universal Credit and which benefits in Universal Credit are subject to the benefits cap.



4.3 How do these changes affect BAME women in Coventry?

The annual costs to people in Coventry of cuts to benefits and tax credits have been estimated as £112 million.[7] Fawcett have calculated that 68% of the cuts to benefits and tax credits have come from women[8] meaning that the cost to women in Coventry will be approximately £76 million.[9]

Many of these cuts and changes will disproportionately affect women and BAME communities.

BAME households are more likely to be poor than the general population.
According to the 2012 DWP Households Below Average Incomes report:

- 18% of white households are in the bottom 25% of incomes.
- 34% of mixed ethnicity households are in the bottom 25% of incomes.
- 39% of Asian or Asian British households are in the bottom 25% of incomes.
- 38% of Black or Black British households are in the bottom 25% of incomes.
- 36% of Chinese or other ethnicity households are in the bottom 25% of incomes.[10]

BAME households receive a larger proportion of their income from benefits.
According to the 2012 DWP Family Resources Survey:

- 8% of the income of white households comes from working age benefits or tax credits.
- 13% of the income of Asian or British Asian households comes from working age benefits or tax credits.
- 17% of the income of Black or Black British households comes from working age benefits or tax credits.
- 12% of the income of mixed ethnic origin households comes from working age benefits or tax credits.[11]

Families of Bangladeshi or Pakistani origin are particularly likely to be poor (49% are in the bottom 25% of incomes) and receive a larger share of their income from benefits or tax credits than any other ethnic group (25%).[12]

In addition, some BAME women will be affected as a result of language and literacy issues, caring responsibilities and lack of control over family income.

4.4 The Changes in Detail and their Impact on BAME Women in Coventry

4.4.1 The Benefits Cap

From 15 April 2013, the Government will introduce a cap on the combined total of benefits that working-age people can receive (i.e. out of work benefits, housing benefit, child benefit and child tax credit).[13] The cap will be:

- £500 p/wk for couples and lone parents regardless of the number of children they have.
- £350 p/wk for single adults with no children.

Housing Benefit is the first benefit to be cut if deductions for the benefit cap are applied. This has raised concerns among relevant agencies that vulnerable people are more likely to get into rent problems (and have an increased risk of homelessness).

Who will these changes affect?
The Department of Work and Pensions has projected that 56,000 households will have their benefits capped nationally in 2013/14.[14] This will rise to 58,000 households in 2014/15 with 80,000 adults and 190,000 children affected in 2013/14[15]. The average reduction will be £93 a week.

Those most likely to be affected are lone parents with 3 or more children, claiming income support and living in the private rented sector. The Government's equality impact assessment of the Benefit Cap concludes that:[16]

> *A large proportion of those affected are likely to be large families, implying that households from cultural backgrounds with a high prevalence of large families and households from certain ethnic minorities that tend to have a higher proportion of large families are more likely to be affected.*

How do these changes affect BAME women in Coventry?
Coventry City Council estimate 270 households will be affected by the benefits cap.[17] They calculate that of those affected 245 households have 4 or more children, and estimate that 1300 children in Coventry will be affected by the cap.[18]

We cannot find any data that breaks this number down by gender and ethnicity. However, the DWP estimates that 'of the households likely to be affected by the cap approximately 40% will contain somebody who is from an ethnic minority' because the cap will hit larger families which are disproportionately likely to be BAME.[19]

As a result of the benefit cap some families will have to move to cheaper accommodation. This will have a particularly severe impact on some groups of BAME women who rely on local communities for support and in particular only visit local agencies. Foleshill Women's Training said:

> *Many of the women who use our services live locally to us. If they are forced to move they may no longer be able to get to our centre because of the time or cost of getting here by public transport from elsewhere in the city.*
> Christine McNaught, Centre Manager, FWT[20]

4.4.2 Benefits and Tax Credit Rates

The rates for benefits and tax credits will be raised by 1% up until April 2015 rather than being increased in line with the Consumer Prices Index (CPI).[21] The Government argues that it is not fair that the salaries of those in work have lagged behind inflation, while benefits increase in line with inflation. However the Women's Budget Group point out that 6 out

of 10 of those affected by the 1% increase in benefits and tax credits are in paid work. In addition, those on lower incomes have been facing a higher rate of inflation because the price of food and fuel (which forms a larger proportion of their expenditure) has been increasing so fast.[22]

How do these changes affect BAME women in Coventry?
People in Coventry will lose a total of approximately £21 million a year as a result of the 1% uprating of benefits.[23] These cuts will have a disproportionate impact on BAME women because they are more likely to be living in low income households than white women.

Disabled BAME women will also be affected. Research by the House of Commons Library has concluded that:

> *Families with disabled people will still be affected by the uprating change since increases in the "personal allowances" in means-tested benefits and the main tax credit elements will be limited to 1%. Furthermore, the "Work-Related Activity Component" of ESA, together with the "limited capability for work" element and the lower rate addition for disabled children in Universal Credit, will also be limited to 1% increases over the next three years*[24]

4.4.3 Council Tax support to replace Council Tax benefit
From April 2013 Council Tax Benefit was replaced by localised support for Council Tax. Local authorities are required to set up new schemes to support people in their own areas within a 10% reduced budget amounting to a £5 billion budget cut.

For Coventry it amounts to a loss of £3million.[25] If the Council were to pass this cut on, it would affect people of working-age who currently receive Council Tax Benefit. However, Coventry is maintaining the current level of support so claimants who receive council tax benefit will continue to receive it at the same level.[26]

How do these changes affect BAME women in Coventry?
Coventry City Council's equality impact assessment on the council tax support scheme found approximately half (47%) of more ethnically diverse areas have above average Council Tax Benefit claimant rates, concluding that 'The correlation between an area's Council Tax Benefit claimant rate and its levels of ethnicity and diversity is strong.'[27] The decision to protect Council Tax Benefit in Coventry by the City Council will therefore benefit BAME women.

4.4.4 Disability Living Allowance (DLA) and Personal Independence Payment
Disability Living Allowance will begin to be replaced by Personal Independence Payment (PIP) for people of working age from 8 April 2013 in a number of pilot areas.[28] New claims for PIP will be undertaken from June 2013 in the rest of the country. Existing claimants will be reassessed from October 2013 onwards.

The stated intention is to target support to those most in need through this new benefit. However, the Government aims to achieve a 20% reduction in expenditure by 2017 by bringing in PIP, leading to fears that the assessments will be focused on reducing access to PIP and reduction in expenditure.[29] There is also concern about how the assessments will be undertaken. The re-assessment will be using the same process as Employment Support Allowance work capability assessments with the same companies involved. Many agencies believe some of those claiming DLA will be deemed to not be entitled to PIP, despite no change to their medical conditions, and so it is envisaged many claimants will lose entitlement.[30]

What does this mean for BAME women in Coventry?
There are 11,340 people of working age receiving DLA in Coventry. Coventry Council has calculated that:

- 29% (3289 people) would receive a higher award.
- 15% (1701 people) would see no change in their award.
- 26% (2948 people) would be awarded nothing.
- 30% (3402 people) would receive a reduced award.[31]

Roughly equal numbers of women and men of working age receive DLA.[32] DLA can currently be used to enable disabled people to purchase the support they need to live independently. If this is cut it will impact on disabled people and also on carers who will have to fill the gap in support.

For BAME women there are particular implications because of the "widespread burden of care" that they face.[33] One interviewer explained the complexities that arise from cultural values and expectations within BAME communities:

> *Within BME households with extended families people are brought up with the values to look after each of their sick family members. If the parents are elderly they expect siblings to look after their disabled siblings. Many of these find it difficult to strike the balance between caring and continuing with their jobs. This causes tension and compounds the further stress to carers.* Uma Sharma, Coventry Carers.[34]

Coventry Partnership have been undertaking road shows to inform people of the changes to welfare benefits. They have found:

> *The perception of disabled people is that the process is hostile and not supportive. They start from a place of feeling they are being penalised.*
> Sue Bent, Director, Coventry Law Centre.[35]

4.4.5 Employment Support Allowance

Employment Support Allowance has been introduced to replace a number of benefits. Claimants are given medical assessments. Those that are entitled to ESA are put into one of two groups, the work related activity group or the support group. Those who are judged able to work are moved onto Job Seekers Allowance. Those in the work related activity group have to show compliance with the work related activities set for them or their benefits will be sanctioned. Those in the support group are not required to take part in work related activity but will be subject to on-going reassessment.[36]

Serious concerns have been raised about the robustness of the medical assessments and whether they are capable of assessing the complexities of the long term sick and disabled.[37]

What is the impact in Coventry?

By May 2012 3550 assessments had been completed in Coventry. Of these 62% (2220) were found to be entitled to ESA of which 1,370 were put in the work related activity group and 850 in the support group. 38% were found fit for work.[38] Those found fit for work will see their income drop from a weekly Incapacity Benefit payment of £101.35 to the Job Seeker's Allowance rate of £71.70 (if they are over 25).

National figures show that 31% of those who appeal against fit for work decisions are successful.[39] According to the Disability Law Service the success rate for appeals where the claimant has legal representation and both claimant and representative attend the appeal hearing is 66.6%.[40] (See the Legal Advice chapter for more information on this issue).

How will these changes affect BAME women?

According to research conducted by Scope, there are one million disabled people of ethnic minority backgrounds and this is probably an underestimate.[41] 44% of BAME disabled people already live in household poverty, compared with 32% of all disabled people and 17% of the population as a whole.[42] Individual incomes for BAME disabled people are 30% lower than for the general population.[43] This means that BAME disabled people are more likely to depend on benefits for a higher proportion of their income and therefore more severely affected if benefits are stopped or reduced.

BAME disabled women may face barriers such as language proficiency which could be a huge barrier when assessments are being carried out.[44] CEMAP point out:

> *It is apparent that if you have the ability to communicate and speak English well you are more likely to get a more receptive response in relation to service delivery. If you can't speak English articulately the service you get is inferior. This is particularly common when BAME women use the telephone as quite often they end up being shouted at.*[45]

4.4.6 The Social Fund

From April 2013 the discretionary Social Fund, which includes crisis loans, community care grants and budgeting loans, has been abolished and replaced with two main sources of support for people in short term crisis:

- 'Payments on account of benefit' from the Department of Work and Pensions - These are loans for claimants in financial need who are waiting for benefit claims to come through. As people move to Universal Credit, these will be replaced by 'Budgeting Advances'. The repayments for Budgeting Advances will be expected to be made within 12 months, extended to 18 months for exceptional circumstances, (the current period for repayment is 24 months).[46]
- Local Community Support grants administered by Local Authorities.

The Women's Budget Group have expressed concerns about the loss of social fund:

> *The stripping down of this vital safety net for the very poorest will further entrench poverty, leaving many living precariously and increasingly reliant on food banks and charity. The WBG is seriously concerned that the burden placed on poor women will be increased further by the changes.*[47]

How will this affect BAME women in Coventry?

In 2009/10 there were a total of 1840 Community Care Grants made in Coventry with a total spend of £872,800. There were 10,840 Crisis Loans to help with emergency living expenses with a total spend of £589,300.[48] This gives a total of £1,462,100.

In Coventry the City Council received £1,195,974 to fund Community Support Grants in 2013/14.[49] This is significantly less than the spend for 2009/10 and it is likely that demand for these grants will increase as a result of cuts

to other benefit payments. The Council will provide community Support Grant in two situations: crisis requiring urgent support and financial hardship requiring support that is not immediate and to those who meet the eligibility criteria. Applications will have to be made via telephone or website. All successful applicants will receive vouchers only.

As BAME women are over-represented among the poorest groups in Coventry they will be disproportionately impacted by these changes.

4.4.7 Child Benefit

Child benefit rates have been frozen for three years from April 2011 – amounting to a real terms cut. In addition, child benefit has been cut for households where there is a higher rate tax payer.[50]

How do these changes affect BAME women in Coventry?

In Coventry 41,300 families will lose out as a result of the freezing of child benefit rates, losing a total of more than £14 million a year.[51]

For some women, child benefit is the only income they receive in their own right. Income is not always shared equally within households and even women with high earning partners may not have access to their partner's income.

For BAME women this is compounded by particular barriers such as language and lack of knowledge of how the welfare benefit and tax systems work which can leave women more vulnerable to financial abuse.[52] Furthermore, extended family living arrangements can leave the mother with no access or control of finances for her children, especially where in-laws have control over family finances.[53]

4.4.8 Tax Credits

There have been a series of cuts to tax credits including cuts to tax credits for families earning over £40,000. Our previous reports have highlighted earlier cuts to tax credits including:

- There was an above-inflation increase in the child element of Child Tax Credit in April 2011 and April 2012 resulting in an additional £180 in the 2011/12 financial year and £110 in the 2012/13 financial year.
- The baby element of tax credits has been withdrawn.
- The basic rate of tax credit and the rate for people working more than 30 hours a week has been frozen for three years.
- A fall in income of up to £2500 will not lead to an increase in a tax credit award.
- Families with children have to work for at least 24 hours a week (instead of the previous 16) and one of them must work at least 16 hours.
- The childcare tax credit has been cut to cover only 70% rather than 80% of childcare costs.

In Coventry 28,500 households will be affected by the changes to Tax Credits, losing a total of more than £23 million a year.[54] All of these changes disproportionately affect women, who are more likely to rely on tax credits for a bigger proportion of their income. BAME women are particularly likely to be affected since a higher proportion of their income comes from tax credits.

4.4.9 Increased sanctions

In addition to the cuts, increased levels of sanctions are being imposed on claimants. There have been a series of news reports suggesting that Job Centre Managers nationally have been setting staff 'targets' to sanction people. Job Centre Advisors nationally have reported concerns that some staff are focusing on "the most vulnerable and easy-to-hit claimants (including) those with language barriers, caring responsibilities" in order to meet targets for sanctions.[55]

How do these changes affect BAME women in Coventry?

The use of sanctions has particular implications for BAME women, who are more likely to lack understanding of the systems and experience language barriers which may make them more vulnerable to sanctions if they fail to understand or be able to meet the requirements placed on them by the Job Centre.

> *We have concerns for people that are finding themselves being sanctioned without knowing what they have done wrong and are not able to come to us. What if you don't understand the language? There are strict appointment rules and sanctions if you do not attend. You have to make all the applications suggested.*
> Ed Hodson, Grants and Policy Officer, Coventry CAB[56]

This situation is exacerbated by the loss of Legal Aid for advice on welfare benefits (see Legal Advice Services chapter for more details).

4.4.10 Universal Credit

The Government is introducing Universal Credit, which will be a new, means–tested, single payment for people who are looking for work or on a low income up to the age when people qualify for pension credit.[57] A range of working-age benefits, including Housing Benefit, will be incorporated into one payment. The payment will be made monthly, directly to a nominated bank account and to one person within the household. The Government argue that it will simplify the benefits system as all the benefits are consolidated into one payment and claimants will not need to change benefits if their employment status changes. Universal Credit has been described as 'the biggest change to the welfare system for over 50 years.'[58]

How will this affect BAME women in Coventry?

According to the Department for Work and Pensions' impact assessment on Universal Credit:

> *Ethnic minority groups tend to benefit more from the move to Universal Credit compared to the general population. This is because they are more likely to be among the group of low earners who benefit most from changes in entitlement. On average households within the population pool with an ethnic minority see an increase in their entitlement of £51 per month.*[59]

However, the EIA also shows that 58% of two-parent families with children will lose out as a result of this benefit.[60] In addition, 36% (500,000) of households headed by lone parents in rented accommodation will receive less income under Universal Credit as will 52% (400,000) of lone parents who are not in rented accommodation.[61] So, in purely financial terms, there are likely to be some winners and some losers among the most vulnerable BAME women in Coventry.

There is also a concern that under Universal Credit the financial independence and access to income of BAME women will be reduced. A policy officer at Coventry CAB summed up the existing problems with welfare benefits faced by BAME women, which may be exacerbated by the move to Universal credit, saying that:

> *BAME women are more likely to lose ESA, more likely to be JSA sanctioned, more likely to lose DLA/PIP, less likely to appeal bad decisions and more likely to be exploited by others, such as private landlords or family members.*
> Policy Officer Ed Hodson, Grants and Social Policy Officer, Coventry CAB[62]

The potential problems of the way in which Universal Credit will be claimed and paid include:

Women's lack of access to independent incomes

Universal Credit will be paid to a single person within a household replacing a range of current benefits, some of which may be paid to one partner and some to another. This will leave many women without access to an independent income. For BAME women this is compounded by particular barriers such as language and lack of knowledge of how the welfare benefit and tax systems work which can leave women more vulnerable to financial abuse.[63] One illustration of this is amongst the service users that Panahghar supports:

> *We find that in 80 to 90 percent of cases the child benefit is in the husband's name. It takes 8 months to sort out after they come to us.*
> Manager, Panahghar[64]

These issues are likely to be exacerbated under Universal Credit:

> *At the moment I can ask families to release some [DLA] money to fund other things. And some do use money appropriately when they can. One pot implies this is the household pot and the money is not individually identified. So the money won't be spent on the girl with learning disabilities. They are at the bottom of the pecking order.*
> Naomi Baker, Grapevine[65]

And there are likely to be particular issues for many BAME women as a result of the move to Universal Credit:

> *A high percentage of our service users across all cultures have never had their own money and don't know how to budget. Within the South Asian culture often elders in the family have access and control over the money. Among Eastern European service users, some haven't handled money at all. Their partners have got jobs and they are the ones earning and controlling the money.*
> Manager, Panahghar[66]

Furthermore, extended family living arrangements can leave the mother with no access or control of finances for her children, especially where in-laws have control over family finances.[67]

Research by Oxfam has shown how the responsibility to send money to extended families can cause further drain on household finances.[68] The Guardian reports 'From the UK, the biggest recipients of remittance cash are India, Nigeria, France, Pakistan and Poland'.[69] Through our research participants have referred to conflict within the household as husbands prioritise sending money to extended families abroad over the needs of the immediate family in the UK.

These concerns were shared by one support worker working with BAME women in Coventry who said:

> *All the money will go into one bank account which most likely will be the husband's name.*
> Manager, Panahghar[70]

Single Monthly payment

Women have been described as the 'shock absorbers' of poverty with responsibility for managing tight family budgets, often going without, so that the needs of the rest of the family can be met.[71] The Citizens Advice Bureau have raised concerns that a single monthly payment will make budgeting more difficult with very little margin for error and little or no funds for emergencies:

Women will have to budget as they will receive one single payment for Universal Credit which will make budgeting harder.
Ed Hodson, Grants and Social Policy Officer , Coventry CAB[72]

Online claims
People claiming Universal Credit will be required to register online. This further disadvantages those BAME women with limited literacy and/or IT skills. The problems caused by online claims can already be seen with other systems that require IT skills such as the Homefinder process for bidding for social housing online. A support worker from Grapevine explained:

The families I've known didn't have the IT skills to do the bidding for the houses [on Homefinder] and so went to private landlords which makes them more vulnerable.
Clare Nash, Grapevine[73]

The move to online access for government departments is particularly problematic at a time when voluntary organisations that provide support and advice are facing cuts in funding (see Voluntary Organisations chapter). Where mistakes are made it may be difficult for women, particularly those who don't have English as a first language, to realise what has happened or to challenge an incorrect decision, as Varinder Kaur from CEMAP points out:

Universal credit will have a detrimental impact because all benefits will be lumped together. People already have difficulty getting to grips with the benefits system.If they are underpaid (or overpaid) no one can tell them how or why. Universal Credit will exacerbate the situation further and people will spiral further into poverty. The changes are not clear and people will be confused.[74]

4.5 The Human Rights and Equality Impact

The overall impact of these tax and benefit changes, particularly when combined with the changes to housing benefit, will hit women more than men and BAME women in particular.

The impact of these changes on individual BAME women in Coventry will depend on their situation. However, for some women the combined impact of changes to benefits and tax credits could lead to a significant loss of income, pushing some of those women into poverty. Among BAME women, lone parents, disabled women and carers are likely to be particularly badly hit. The move to Universal Credit also raises serious concerns that some BAME women will be left without access to an independent income.

Poverty has significant long term impacts on people's overall health and well-being that also raises human rights issues:

- **Infant mortality** is 50% more common among those from manual backgrounds than those from non-manual backgrounds.[75] Infant mortality in Coventry is 5.6 per 1000 live births compared to 4.4 per 1000 live births as the average for the rest of England.[76]
- **Life expectancy** is linked to poverty. People living in Foleshill ward are likely to die eight years earlier than someone living in Wainbody.[77]
- **Poorer children** on average experience poorer health during their childhoods and the effects of this last throughout their lives. Three-year-olds in households with incomes below about £10,000 are 2.5 times more likely to suffer chronic illness than children in households with incomes above £52,000.[78] Approximately 75% of Pakistani and Bangladeshi children and 50% Black children aged 7 live in poverty.[79] Children growing up in poverty experience significant long term impacts on their health, educational attainment, employment opportunities and life expectancy.[80]
- The risk of mental illness for someone in the poorest fifth of the population is three times that of someone in the richest fifth of the population.[81]

Therefore, if the combined impact of changes to benefits and tax credits leads to a significant loss of income, pushing women into poverty, this could impact on their right to health or even their right to life.[82]

4.6 Monitoring Required

Coventry City Council is already starting to monitor the impact of welfare reform on people in Coventry, looking at a range of indicators including the total number of people affected, the amount of money lost and the breakdown of impact by equality group (gender, ethnicity, disability and so on). They are also monitoring other indicators of impact including health, homelessness, use of food banks and so on. This is to be welcomed.

However, detailed monitoring that includes impact broken down by more than one factor (for example, the particular impact on BAME women) requires a commitment to data collection at a national level. It also requires a commitment to researching the cumulative impact of these cuts and changes on real

women's lives (longitudinal qualitative research). The impact of the changes to benefits and taxes and the harsher sanction regime should be monitored to assess:

- The long term impact of the changes on BAME women compared to other groups.
- The impact of the changes on the human rights of the poorest BAME women and other vulnerable groups.

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2 Calculated as 68% of the total based on Fawcett's work. Fawcett Society (2012) "How have Coalition budgets affected women?" Available online at https://docs.google.com/spreadsheet/ccc?key=0AonYZs4MzlZbdHA1M2JJVF8tZTBvYWUzeFRnRU1yOHc#gid=0 (accessed 14 May 2013)

3 The Poverty Site (2011) "Low Income and Ethnicity."Available online at http://www.poverty.org.uk/06/index.shtml?2 (accessed 24 January 2013)

4 Email correspondence Coventry City Council staff June 2012

5 Unite Union (2012) "Personal Independence Payment replaces Disability Living Allowance. "Available online at http://www.unitetheunion.org/growing-our-union/communitymembership/timeineofimportantwelfarebenefitchanges affectingcommunitymembers 201213/personal independencepaymentreplacesdisabilitylivingallowance/ (accessed 3 May 2013)

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7 Beatty, C. and Fothergill, S. (2013) "Hitting the Poorest Places Hardest: the local and national impact of welfare reform." Sheffield Hallam University. See link to full data set giving breakdown by local authority area on page 4. Available online at http://www.shu.ac.uk/research/cresr/sites/shu.ac.uk/files/hitting-poorest-places-hardest_0.pdf (accessed 14 May 2013)

8 Fawcett Society (2012) "How have Coalition budgets affected women?" Available online at https://docs.google.com/spreadsheet/ccc?key=0AonYZs4MzlZbdHA1M2JJVF8tZTBvYWUzeFRnRU1yOHc#gid=0 (accessed 14 May 2013)

9 Calculated as 68% of the total based on Fawcett's work. Fawcett Society (2012) "How have Coalition budgets affected women?" Available online at https://docs.google.com/spreadsheet/ccc?key=0AonYZs4MzlZbdHA1M2JJVF8tZTBvYWUzeFRnRU1yOHc#gid=0 (accessed 14 May 2013)

10 DWP (2012) Households below average income 2010/11. p.62. Available online at http://statistics.dwp.gov.uk/asd/hbai/hbai2011/pdf_files/full_hbai12.pdf

11 DWP (2012) Family Resources Survey 2010/11. p.41-42. Available online at http://research.dwp.gov.uk/asd/frs/2010_11/frs_2010_11_report.pdf (accessed 14 May 2013) Ethnic groups given are those use in the report

12 DWP (2012) Family Resources Survey 2010/11. p.41. Available online at http://research.dwp.gov.uk/asd/frs/2010_11/frs_2010_11_report.pdf (accessed 14 May 2013)

13 DWP (2012) Benefit Cap Worksheet: Available online at http://www.dwp.gov.uk/docs/benefit-cap-factsheet.pdf (accessed 18 December 2012)

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15 DWP (2012) Benefit Cap (Housing Benefit) Regulations 2012, Impact Assessment for the Benefit Cap. p.7. Available online at http://www.dwp.gov.uk/docs/benefit-cap-wr2011-ia.pdf (accessed 18 December 2012)

16 DWP (2012) " Benefit Cap: Equality Impact Assessment."p.8. Available online at https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/174972/eia-benefit-cap-wr2011.pdf.pdf (accessed 18 December 2012)

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20 Email correspondence with author, June 2013

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5. Education and Training

5.1 Overview

BAME women in Coventry will be affected by a series of cuts and changes to spending on education. Some of these cuts will have a disproportionate impact on BAME women (for example, changes to provision of ESOL). Others, such as the end of Education Maintenance Allowance, will affect low income families, which includes a disproportionate number of BAME families. Women's lifetime earnings are lower than men's, meaning that they are less likely to be able to meet the increased costs of studying.[1]

Women, including BAME women, tend to be the primary carers of children. This means that they will suffer an indirect impact from cuts to funding for education. The loss of after school clubs may affect their ability to work or study. Women struggling to balance budgets, particularly when combined with cuts to welfare benefits and an increase in the cost of living, may find it harder to meet the costs of their children's education, for example school trips and uniform.

5.1 What Cuts and Changes are Happening?

Institute for Fiscal Studies researchers estimate that total public spending on education in the UK will fall by over 13% in real terms between 2010/11 and 2014/15.[2]

Further Education and Skills has had a "real term reduction in funding of 25.1% … which equates to a reduction of over £1bn by 2014-15".[3]

The Adult Skills budget will fall from £2.7bn in 2012/13 to £2.2bn in 2014/15.[4]

A number of cuts and changes are happening to educational programmes that will affect people in Coventry. Below we concentrate on the cuts and changes which were identified as most important to the BAME women we interviewed. These are:

- Schools funding
- Support for further education and training
- Funding for higher education

Each of these are discussed in turn below.

5.2 School funding

The Government argued that spending on schools has been ring-fenced and that this will continue for 2013/14.[5] In addition, schools with children who have received free school meals in the last six years receive additional money through the pupil premium.[6] However, the Institute of Fiscal Studies has argued that as a result of a freeze in funding in cash terms most schools will not see a real terms increase in funding.[7] There have been newspaper reports suggesting that the ring fencing of the schools budget may be under threat.[8]

Coventry's Education and Learning Budget was cut by more than £2.5million in 2011/12.[9]

5.2.1 What is the impact in Coventry?

Cuts to the Education and Learning Budget in Coventry have led to a series of cuts to education services including:

- Ceasing targeted support for English and Maths for those pupils in Y10/11identified at risk achieving less than a C in GCSE.
- Reduction in support for health education – Healthy Schools.
- Ceasing Playing for Success – after school support for vulnerable pupils in partnership with Coventry City and Coventry Blaze.
- Ceasing Targeted Mental Health in Schools.
- Reduction to the services provided for:
  - Dyslexia
  - Behaviour and attendance
  - Sensory support
  - Speech and Language
- Reduction in the capacity to support and challenge schools, particularly with specific targeted curriculum support.
- Achievement for All – directly to schools for Special Educational Needs.[10]

In addition to these cuts to services there has been an increase in charges to parents for services such as after-school clubs. Across the West Midlands the cost of after-school clubs has risen by 16% between December 2011 and December 2012.[11]

BAME women tend to be the primary carers of children and are therefore affected by cuts to after school clubs and services. As well as the financial costs of paying for after-school clubs, there has been a negative impact on families and the socialisation of children. One support worker, who works closely with the Traveller community, referred to the wider benefits of after- school clubs, highlighting the potential impact of their cuts:

Children would access breakfast and after school clubs and learn more because they are socially more able in those circumstances. The young people I have met are confident to talk to you and can play and are used to having lots of children around. After school clubs are more the type of environments they are used to and can make friends, rather than an academic setting. These clubs were the very pull to get the kids into school. And that's where their confidence was as they were used to sharing and being in a chaotic environment. After school clubs are like home but with more resources.
Claire Nash, Support Worker, Grapevine[12]

The Citizens Advice Bureau has undertaken research in Coventry examining the impact of rising costs associated with school, such as school uniform and school trip expenses, on low income families. They concluded that families are finding it hard to meet even 'expected' costs such as new school uniform on top of other rising costs such as food and fuel.[13]

In some instances this can mean that parents or carers go without to provide for their children and still be able to pay their essential outgoings.[14]

The research also highlighted the possible long term impacts of these cuts:

It is reasonable to suggest that the impact of additional school costs may well contribute to financial difficulties for families. This may see families turning to extremes such as costly lenders, loan sharks or payday loan companies to cover all their necessary expenditure. In the future, this may even include basing the decision on which school they send their child to on its additional costs or charging policy.[15]

As BAME women are disproportionately represented in low income families and are the main carers of children, they are impacted as a result of rising school costs.

I supported one mum when the cost of the after-school club went up. She couldn't afford to pay, which meant she had to leave work early in order to pick her son up from school.
Claire Nash, Support Worker, Grapevine[16]

Cuts to special needs support and mental health support in schools are particularly likely to affect children living in poverty (a disproportionate number of whom are from BAME families) and children who don't have English as a first language.[17] This will not only directly impact the children, but also will have an indirect impact on their mothers, who face, among other things, the work of trying to find additional help taking children to appointments and appealing against decisions. These women will no longer be entitled to legal aid for education cases, which will further exacerbate their situation (see Legal Advice chapter on this).

5.3 Cuts and changes to support for further education and training

5.3.1 16-19 Bursary Fund

A Bursary fund has replaced the Education Maintenance Allowance, which was paid to learners from low income families to help them stay in education after the age of 16. The level of funding has been cut from £560 million for the EMA to £180 million for the Bursary Fund.[18] An Equality Impact Assessment of EMA carried out in 2009 showed that EMA was particularly important in helping teenage mothers and young people with special needs stay in education and had a particularly positive impact on BAME girls and young women.[19]

The 16 – 19 Bursary Fund is an allowance of up to £1200 per year for young people aged 16 to 19 in further education or training. It is divided into two sections: the 16-19 guaranteed bursary, and the 16-19 discretionary fund. To be eligible for the 16-19 guaranteed bursary, applicants must be in either:

- Local authority care, or have recently left local authority care, or
- Personally in receipt of Income Support, or
- In receipt of Employment Support Allowance and Disability Living Allowance,
- And be studying for a minimum of 30 weeks on a full time course.

The discretionary fund is allocated by the college, school or work based training provider to those with a household income of less than £16,190/annum to fund travel, books and equipment.[20]

Schools, colleges and work-based training providers will take on the responsibility of assessing and awarding the bursaries. The Government has argued that the Bursary Fund will be better targeted at those who are in greatest need, claiming that "there is no data to suggest that this particular change will have a disproportionate impact on young people with disabilities and/or learning difficulties; on either gender or on those of different ethnicities. Importantly, discretionary funds can be targeted more sensitively to those who most need the support."[21]

However, Barnardos have undertaken research focusing on the Bursary Fund in its first term of administration (September to December 2011).

They identify that "several groups of vulnerable young people have been omitted" from the four eligibility categories, including young carers and those from low income families.[22]

Barnardos' research demonstrates that many young people have no financial means to fund their expenses, leading them to reconsider whether they can stay in education.[23] They conclude that:

> *The assumption that young people used EMA as an optional incentive to continue in learning is misleading. In fact, the poorest young people used it as a necessary means of support and without it they struggle to continue with the education or training they need to find the jobs they aspire to.*[24]

The Youth Cohort Study, which sampled respondents in receipt of EMA, indicated that the 17/18 year olds most likely to have taken up EMA were:[25]

- Minority ethnic groups, particularly Bangladeshi and Pakistani.
- Members of 'lower' socio-economic groups.
- Those who received free school meals while at school (almost 90% of students who received free meals at school received EMA, and almost all of them at the top rate).
- Those whose parents are less well educated.
- Students who are living with only one parent.

A survey conducted by The Association of Colleges found that 49% of the further education colleges, sixth form colleges and specialist colleges surveyed had fewer students in the first academic year of the introduction of the Bursary Fund, as compared with the previous year. The study cited financial pressures, such as loss of the EMA grant and transport costs, as the main reasons for this reduction in students.[26] Additionally, the President of the Association of Colleges has said that it was the "poorest students with the lowest skill levels who are not enrolling".[27]

In May 2013 the Department for Education released a report evaluating the Bursary Fund. It was found that the average percentage of applicants for the guaranteed bursary who were female (54%) was slightly higher than for the student population.[28] It also appeared that the proportion of BAME Bursary recipients reflected the BAME populations within schools, although there was a slightly higher proportion of BAME recipients than white recipients.[29] However with the cut in funding the overall level of support for students has been reduced.

The report identified a number of factors which might act as barriers to take up of the Bursary Fund including:

- Difficulty with the application process, particularly for those who did not have English as a first language, or where parents and children had learning difficulties.
- Lack of evidence of income, which was a particular problem for asylum seekers.
- Unwillingness to share personal financial information with a school or college in order to apply for a bursary.[30]

What is the impact in Coventry?

The total Bursary funding allocation for Coventry for the academic year 2012/13 was £1,320,255,[31] made up as follows:

- Further Education Providers - £932,243 (the largest recipients were City College awarded £381,337 and Henley College £253,931).
- Sixth Form colleges - £388,012.

This is a significant drop on the amount of EMA claimed by students in Coventry. In 2010 roughly 2,560 students received EMA.[32] Nationally around 80% of those receiving EMA received £1170 a year; if Coventry were in line with national figures that would mean those students alone would receive more than £2,396,000 a year between them. The other 20% of students would receive lower rates of funding, meaning that the total amount received for EMA in Coventry would be even higher. Coventry students are likely to have lost over £1million as a result of the switch from EMA to the Bursary Fund.

In focus groups carried out for this research, women shared their concerns about the loss of EMA. Points raised across several groups included:

> *Abolishing EMA hasn't abolished the needs of children.*[33]

> *I feel I've let my children down because I can't afford to support them at college. I am worried they will miss out.*[34]

We could find no evidence that BAME women who would have qualified for EMA are less likely than other groups in Coventry in the same situation to receive the Bursary Fund. However, the drop in the amount of total funding available, and the importance of EMA for BAME young women, means that the loss of EMA is likely to have a negative impact on the poorest BAME young women in Coventry.

In addition to the impact on students, the loss of EMA has had an impact on the financial wellbeing of their families:

> *Coventry CAB have noticed cases of increased debt amongst families as a result of loss of EMA. Family income is going down. More families are going to Pay day loans, Loan sharks.*
> Ed Hodson, Coventry CAB[35]

5.4 English for Speakers of Other Languages (ESOL)

The Government reversed a decision to restrict funding for free ESOL courses to those in receipt of Jobseekers Allowance or Employment Support Allowance which was highlighted in our previous report, *Unravelling Equality*.[36] However, funding is based on a maximum amount of hours that it is assumed a course will take, which may be less than the actual amount of time taken.[37]

Nationally the number of enrolments in ESOL in 2011/12 was 138,400, down from 163,600 in 2010/11.[38]

What is the impact in Coventry?
The Workers Educational Association (WEA) in Coventry has expanded their ESOL provision as part of a partnership with Jobcentre Plus to provide a 12 week intensive course. Their emphasis is upon community involvement and so they focus on spoken English as opposed to reading and writing skills. This means that students on the course are still disadvantaged when it comes to filling in applications for jobs and benefits:

> *I feel really bad. They can't speak English and they are being asked to complete the application forms and search online. They come in really upset. It must be really frustrating for them. I stay on afterwards and try and help them fill in their forms.*
> Tutor at Workers Educational Association[39]

Some voluntary organisations in Coventry that refer women on to ESOL courses have observed what they perceive is a reduction in ESOL provision, with women waiting longer for ESOL classes:

> *Many have reduced their spaces. One woman was put on the waiting list at the beginning of February and she only had her assessment on 21 April to see if she was eligible for the ESOL classes.*
> Manager, Panahghar Safehouse[40]

Foleshill Women's Training reported a number of barriers to BAME women accessing ESOL courses including eligibility for funding, lack of childcare provision and the need for women only spaces:

> *We had 60 women who wanted to enrol for ESOL but only 10 of them met the criteria for funding. Henley College, which provides ESOL courses through our centre, have had a reduction in childcare support, which means that we cannot offer childcare places to all the women who want them. For the women who come to us it is important that we are a woman only centre – mixed provision may not be suitable.*
> Christine McNaught, Foleshill Women's Training[41]

At the time of writing FWT were facing uncertainty about whether they would be able to offer ESOL courses from September 2013:

> *We have just heard that Henley College are not providing ESOL from September. We don't know why, but as of today we don't have ESOL courses in September.*
> Christine McNaught, Foleshill Women's Training[42]

5.5 Higher education

Universities have experienced cuts for teaching of up to 80%, with funding for arts, humanities and social sciences cut completely.[43] To replace this loss, universities are charging students fees of up to £9000 a year. The Independent Commission on Fees has examined the impact of fees on applications to university, concluding that women are now a third more likely to enter higher education than men and that the gender gap seems to have widened since 2010.[44]

However, the report also concluded that students from the richest fifth of neighbourhoods are ten times more likely than those from the poorest fifth of neighbourhoods to go to one of the top 13 universities and that this gap has got wider since the introduction of tuition fees.[45]

> *I can't afford buses never mind university fees!*[46]

This gap is particularly concerning for BAME students who are still less likely to be successful in gaining places at the most prestigious universities. Both Oxford and Cambridge have recently been the subject of investigations into the way they make offers, which show that ethnic minority students are significantly less likely to receive offers than their white counterparts, leading one MP to make the accusation that " these figures suggest institutional bias, and certainly show sustained institutional failure."[47] A recent study from Durham University also found that ethnic minorities are 'less likely' to gain Russell Group places.[48]

There are two universities in Coventry. The University of Warwick has set fees at £9,000.[49] Coventry University has announced variable fee levels of between £4,600 and £9,000.[50]

The impact of the fees, combined with job losses, cuts to benefits and the rising cost of living was mentioned by women in the focus groups as a barrier to their daughters' education. One woman said, to the agreement of others in the room:

> *My husband has lost his job and we don't have much money and so we are only thinking about now sending our son to university and not our daughter.*[51]

5.6 Human rights and equality impacts

Many of the cuts described above will have a disproportionate impact on BAME women in Coventry. Taken together they may:

- **Act as a barrier to women obtaining educational qualifications.** Increased university fees and reduced support for post 16 education all act as a significant barrier to BAME women accessing education.
- **Increase poverty** – Increasing costs of education combined with reduced levels of support for post 16 education, along with with other cuts to welfare benefits and the increased cost of living, will increase some BAME women's poverty.
- **Have negative impacts on women later in life** – BAME women who are unable to continue in education or obtain the qualifications they need may see their earning potential and job prospects reduced.

5.7 Monitoring required

In order to assess the human rights and equality impact of these changes on BAME women in Coventry the following should be monitored:

- The number and percentage of BAME women who are accessing further and higher education, and support programmes for higher and further education.
- The indirect impact on BAME women of cuts and the reduction of support services in schools.

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6. Violence Against Women

6.1 Overview

Violence and/or abuse against women is a widespread, but often hidden, abuse of women's human rights. Violence affects women from all backgrounds and ethnicities, but there are particular forms of violence which disproportionately affect BAME women. BAME women's experiences of violence may also differ as they are often dealing not just with the experiences of violence from their perpetrators but are also dealing with issues of racism and marginalisation within wider society.

This chapter shows how the cumulative impacts of cuts: cuts to advice, housing and counselling services to women, cuts to the budget of the police, CPS and National Health Service combined with cuts to legal aid and cuts to welfare benefits will all have an impact on the human rights of BAME women victims and survivors of violence in Coventry.

Coventry City Council has made tackling domestic violence a strategic priority for the city and so domestic violence services have not suffered the level of cuts they have in many other part of the country. However, agencies in Coventry still face an insecure funding situation. There are particular problems for smaller specialist service providers, in particular BAME service providers, whose expertise and cultural knowledge is needed by BAME women.

6.2 The scale of the problem

Violence against women is a widespread but under-reported abuse of women's human rights. It is estimated that approximately:

- 2,600 women in Coventry are raped or sexually abused every year.[1]
- 6,100 girls aged 0-16 in Coventry and 3,300 boys are likely to have been raped or sexually abused before the age of 16.[2]
- 30,000 women in Coventry are likely to have been raped or sexually abused at some point in their lifetime.[3]
- Between 10,000 and 15,000 women in Coventry will experience domestic violence every year.[4]
- 38,000 women in Coventry are likely to experience domestic violence in their lifetime.[5]

In addition to those figures:

- If sexual assault and stalking are included, then it is estimated that more than 69,000 women in Coventry (45% of the female population) have experienced at least one incident of inter-personal abuse in their lifetimes.[6]
- Repeat victimisation is common. 44% of victims of domestic violence are involved in more than one incident. No other type of crime has a rate of repeat victimisation as high.[7]
- 29.3% of recorded violence is related to domestic violence and abuse making Coventry the third most affected area per 1,000 population in the West Midlands (below Wolverhampton and Sandwell) at a rate of 5.27. The average rate is 4.77 for the West Midlands.[8]

In Coventry 7.5% of victims of recorded crimes of violence and abuse were of African-Caribbean origin, which is significantly higher than the population estimate.[9] The percentage of Asian and white victims of reported crime was in line with the population estimates.[10]

6.3 Specific issues for BAME women

While violence against women is experienced by women from all backgrounds and ethnicities there are some forms of violence that are more likely to affect BAME women, and there are important differences in the experiences of BAME women and the way they are treated by service providers. BAME women are often dealing not only with their experiences of violence but also with racism and marginalisation.[11]

Specific issues facing BAME women include:

6.3.1 Forced marriage

A forced marriage is one where one or both partners are coerced into marriage through physical, psychological, financial, sexual and emotional pressure.[12] Forced Marriage affects many communities including "Irish Traveller, Afghan, South Asian, Kurdish, Iraqi Kurd, Arab and some African communities".[13]

The Forced Marriage Unit gave advice or support in 1,485 cases in 2012, although it is believed many other forced marriages go unreported.[14]

6.3.2 'Honour' based violence

The CPS and ACPO define 'honour' based violence as 'a collection of practices, which are used to control behaviour within families or other social groups to protect perceived cultural and religious beliefs and/or honour. Such violence can occur when perpetrators perceive that a relative has shamed the family and/or community by breaking their honour code. Women are predominantly (but not exclusively) the victims of 'so called honour based violence', which is used to assert male power in order to control female autonomy and sexuality.'[15] Women from many different communities

experience this form of violence including Irish Traveller communities, Latin American and Caribbean communities as well as South Asian, Turkish and Middle Eastern communities.[16] It is widely quoted that there are 12 honour homicides a year in the UK.[17]

6.3.3 Female Genital Mutilation (FGM)
The World Health Organisation defines Female genital mutilation (FGM) as "all procedures that involve partial or total removal of the external female genitalia, or other injury to the female genital organs for non-medical reasons."[18] It is mostly carried out on young girls up to the age of 15.[19]

It is illegal to take girls who are UK Nationals or those with UK permanent residence abroad to have this procedure done.[20] Despite the criminalisation of FGM to date there have been no convictions.[21]

The full extent of FGM in the UK is unknown. The Department of Health estimates that over 20,000 girls under the age of 15 are at high risk of FGM in the UK and that around 66,000 women in the UK are living with the consequences of FGM.[22]

6.3.4 Violence from family members
BAME women are more likely to experience domestic abuse and violence from multiple perpetrators including extended family members. Research undertaken by Imkaan reported that 45% of the women interviewed reported violence and harassment from other members of the family such as parents-in-law.[23] This may not always be recognised by generic service providers who assume a pattern of abuse by a partner.

In addition to these forms of violence there are some groups of BAME women who may be particularly vulnerable to violence and abuse.

6.3.5 Migrant women
Migrant women are some of the most vulnerable of our society. They are often in unregulated roles such as domestic work, cleaning and prostitution, often on low wages with no benefits and no rights. They are also less likely to be able to access public health services. This results in their vulnerability to exploitation and abuse.[24] Particularly vulnerable women include:

Women with insecure immigration status
Insecure immigration status can affect many BAME women's decisions to leave the abusive relationship.[25] For instance, research undertaken by Imkaan reported that 92% of women with immigration issues reported threats of deportation by the perpetrator, which presents a key barrier to women's ability to leave situations of violence.[26] One of the key findings was that 'overall women were less likely to approach Victim Support, A&E departments or non-specialist community groups for support.'[27]

Refugees and asylum seeking women
Of the 20,000 people seeking asylum in the UK in 2012, 5,000 were women.[28] Often the women are fleeing persecution and violence and seek refuge from the injustices experienced. Research into the experiences of women who sought asylum in the UK found '66% had experienced some kind of gender-related persecution.'[29]

6.4 Need for specialist services

In order to address the specific needs of BAME women experiencing violence there is a need for services with specialist expertise and cultural knowledge that are sensitive to the issues and risk that women face.[30] BAME women are more likely to have additional complex needs such as insecure immigration status, lack of knowledge of how systems work in Britain, as well as language barriers which often mean additional assistance is required to support the women and address their needs. BAME women also tend to remain in abusive relationships for longer periods of time before seeking help and support.[31] In a survey by Imkaan 89% of BAME women had a preference for receiving support from a BAME violence against women specialist service.[32]

Many BAME agencies have voiced concerns about the move to 'generic' services as funders make budget cuts arguing that generic services often fail to meet the needs of BAME women.[33]

6.5 What cuts are happening in Coventry and how will they affect BAME women?

BAME Women experiencing violence and/or abuse in Coventry will be affected by a number of cuts to funding and changes to welfare benefits. Here we provide an overview of the main changes before exploring each in depth in the sections below.

- Services for women experiencing violence in Coventry are under threat. Some agencies have already lost significant funding. Funding for other services is currently under review leaving organisations uncertain about their future.
- The police are facing a budget cut.
- The Crown Prosecution Service is facing a budget cut.

- The National Health Service is facing a budget cut which may reduce the level of support available to victims of violence. It is not clear how far the new GP consortia will continue to fund work previously funded by Primary Care Trusts.
- Cuts to legal aid will reduce the ability of women experiencing violence to get the legal help and support they need.
- Cuts and other changes to welfare benefits risk increasing women's financial dependency on men, making it harder for women to leave violent relationships.

Each of these issues is dealt with in turn below.

6.5.1 Services for women experiencing violence

The Supporting People (SP) programme was set up in 2003 with a ring fenced funding budget of £1.8 billion to fund services for vulnerable people including women experiencing domestic violence.[34] This will be reduced to £1.59 billion in 2014/15.[35]

The programme has been a main source of funding for many voluntary organisations, in particular those for BAME women.

Coventry City Council has made tackling domestic violence a strategic priority for the city and Coventry has not faced the level of cuts to violence against women services seen in other parts of the country. However, the City Council is facing significant and on-going cuts to its budget, which have had an impact on funding to services. Coventry Haven reported that:

> *Refuge services at Coventry Haven have taken a 10% hit to the supporting people budget already this year but continue to provide the same level and quality of services to women in crisis.*
> Elaine Yates, Coventry Haven.[36]

Coventry City Council are undertaking a new approach to determine the way victims of domestic violence and abuse are referred and supported throughout the pathway towards independent living. Coventry City Council said of the process:

> *The providers and the council have worked closely together to understand the gaps in service provision and to develop a set of services that will meet the needs of victims of Domestic Violence and Abuse.. We have worked with providers, victims and others to co-design a model. This will go out on a competitive tender basis. Partner organisations or consortiums will be encouraged to bid for the service which consists of a range of 'lots' including work with perpetrators. The procurement process is intended to address the gaps in service and ensure a more integrated approach to the way they are delivered.*[37]

However, several of the organisations we spoke to argued that the new commissioning process could pose a threat to smaller specialist providers who might lose out to larger organisations which have the infrastructure to tender for commissions that provide a number of different service offerings but do not necessarily have the specialisms themselves nor the local knowledge and commitment to meet the needs of local residents.[38]

Coventry Haven has argued that:

> *The future commissioning process is a real threat to local providers, the risk is that 40 years plus rich and valuable local experience and specialism at each agency is at risk and once it's gone that is it.*
> Elaine Yates, Coventry Haven.[39]

In addition to funding from the City Council, agencies in Coventry receive funding from a range of other local and national agencies. All of these sources of funding are either being cut or experiencing increasing demand. All the agencies we spoke to for this report reported worries about future funding including:

Panahghar

Panahghar, which provides specialist services for BAME women experiencing violence and abuse in Coventry, have lost their refuge provision in Leicester to a generic service provider; a total loss of £300K per year. This has had a knock on effect on its staffing and service provision in Coventry. Women with no recourse to public funds are often referred to Panahghar. These cases are often the most complex requiring liaison with many different support agencies to resolve immigration status, obtain benefits, register with health care services and legal services as well as supporting women to gain knowledge of how systems work, from catching a bus to registering with local doctors and dentists. Generic providers are often reluctant to support women with no recourse to public funds. Since the loss of the contract Panahghar continue to receive referrals for women with no recourse to public funds from solicitors and other refuges.

We are meeting the demand, in the last quarter we had one night when we had spaces. We are funding this from Panahghar's reserves.
Manager, Panahghar.[40]

Coventry Rape and Sexual Abuse Centre

Coventry Rape and Sexual Abuse Centre (CRASAC) was funded by the Equality and Human Rights Commission to do outreach work with communities that did not currently access their services. The EHRC no longer has funds to make grants of this type – CRASAC is currently continuing to provide this project, but faces an uncertain financial future:

We will have to prioritise our services, for example we will keep BAME and not do LGBT provision. We have based this decision on the impact. We had seen a 72% increase to the Independent Sexual Violence Advise Service and 24% increase to counselling service from BAME clients.
Dianne Whitfield, CEO, CRASAC. [41]

Coventry Haven

Coventry Haven provides safe housing and a range of support services for women who have experienced or are experiencing domestic violence and abuse. They are facing cuts to some funding streams and others where funding will end as well as increased demand for their services:

The number of women seeking refuge due to forced marriages and honour crime has increased over the last few years. We generally support approximately 4 women who have no recourse to public funds at any one time. There are additional complexities to accepting these women into refuge, including funding, but we accept women with no recourse to public funds into our service and their status doesn't prevent them from accessing our services. We are committed to support these women even if it requires contingency funds from our reserves.

Demand for our outreach services has reached maximum capacity - and we are very reliant on volunteer services. We have run a successful Community Links Project which recruits volunteers from hard to reach service user groups - Bangladeshi women, African women and Eastern European women. Victims from within those communities are coming forward and disclosing domestic abuse and accessing our service. This project only has funding for 1 more year.
Elaine Yates, Coventry Haven. [42]

In addition to cuts to violence against women agencies, cuts to other women's organisations are having an impact on women experiencing violence. For example, Foleshill Women's Training which works with BAME women has lost 57% of their funding since 2010/11. This reduces their capacity to signpost and support women to access violence against women services.

6.5.2 The Police

In November 2012 the West Midlands Police Authority was disbanded and elections took place for a Police Crime Commissioner. The Labour candidate, Bob Jones, was elected. Before his election Bob Jones had signed up to the Coventry Women's Voices manifesto on tackling violence against women.[43]

The settlement for West Midlands Police for 2013/14 is £474.7M down from £482.2M, a reduction of 1.6%.[44] In cash terms this is a reduction of £44M taking into account formula damping (where all police forces receive the same decrease in central funding).[45] The West Midlands Police and Crime Commissioner is to create 100 new police staffing posts in order to release 100 police officers for operational duties.[46] At the time of writing it is still to be determined how many of these new posts will be specialist domestic abuse officers.

6.5.3 The Crown Prosecution Service

West Midlands CPS have had cuts of £10million between 2010 and 2013 with more cuts planned for this year. 25% of management jobs have been lost.[47]

Most sexual violence cases are now being heard in Leamington rather than Coventry. The CPS are all now located in Birmingham which inevitably has an impact on the early discussion between the team on cases and places additional barriers on BAME women, including having to travel to Birmingham and Leamington which will incur additional transport costs at a time when many BAME women are more likely to be living in poverty.

6.5.4 The National Health Service

The National Health Service and local healthcare providers are facing a budget cut which may reduce the level of support available to victims of violence. It is not clear how far the new GP consortia will continue to fund work previously funded by Primary Care Trusts.

Violence against women has long term impacts on the physical and mental health of women. The impact of rape and sexual abuse includes anxiety and panic attacks, depression, substance misuse, eating disorders, self harm and suicide.[48] Women who experience domestic violence require twice the level of general medical services and three to eight times the level of mental health services.[49] Half of the women of Asian origin who have attempted suicide or self-harm are domestic violence survivors.[50]

Research by the Women's National Commission for the Department of Health has demonstrated

the ways in which health services currently fail to meet the needs of women experiencing violence.[51] Any cuts to NHS funding may reduce the ability of health services to meet these women's needs still further. For example, cuts to translation and interpretation services may mean that women have difficulty accessing maternity services, which is a key time for identifying cases of domestic violence. In the chapter on Health we report complaints from BAME women that family members were expected to act as translators during medical appointments. This makes disclosure of violence far less likely.

6.5.5 Cuts to legal aid

Legal Aid has been reduced or eliminated for a wide range of cases. The Legal Advice Services chapter of this report explores these issues in much greater detail and how they will affect women in Coventry.

Although the Government has stated that legal aid will continue for survivors of domestic violence in family law cases, many organisations working with victims and survivors of violence believe that the evidence criteria is going to be difficult to satisfy.[52] The vast majority of the ways in which evidence of domestic violence can be demonstrated require the reporting of the domestic violence to statutory services.[53] But research from Imkaan shows many women do not report to statutory services.[54] For BAME women, in particular those with no recourse to public funds, this has implications as quite often women do not have valid documents, such as bank accounts, driving licences as well as passports which may have been confiscated by the perpetrator. The ability to prove domestic abuse can be a very onerous task as Coventry Haven point out:

> *Cuts to legal aid and the criteria for women to be able to access legal aid will have a huge impact on our clients. The criteria of having to prove domestic abuse by having had a non-molestation order, reported to police or been in a refuge excludes the majority (70%) of women who do not report their abuse to the police and has an even greater impact on BAME women who have additional language, immigration and cultural barriers to reporting.*
> Elaine Yates, Coventry Haven.[55]

In addition, many women victims and survivors of violence may also need legal advice on welfare benefits, debt or housing issues, which will no longer be funded by legal aid (see Legal Advice Services chapter for more details).

6.5.6 Cuts and other changes to welfare benefits

Cuts and changes to welfare benefits are dealt with in more detail in the Incomes and Poverty chapter, the specific implications of these changes for victims and survivors of violence include:

Universal Credit - The Government is planning to replace out of work and in work benefits with a new 'Universal Credit'. In couples this will be paid as a single payment to one partner. With many BAME women facing financial inequality and marginalisation within the family, combined with lack of knowledge of systems and language barriers, this may reinforce their financial dependency on their male partners and expose them to potential financial abuse.

Benefits for disabled people – BAME disabled women face multiple inequalities with intersectionalities of ethnicity, gender and disability. Changes to benefits for disabled people may increase disabled BAME women's financial dependence on their partners and families. This will increase these women's vulnerability to financial abuse and may make it harder for women to leave violent relationships.

Agencies fear that the changes to benefits undermine women's ability to leave abusive relationships.

> *When women leave abusive relationships they need access to benefits and social housing is a prerequisite for leaving a violent relationship. Women face huge difficulties when leaving relationships. They face uncertainty, destitution, homelessness as well as uprooting their children. So often their decisions are to stay for the sake of the children. A lot of abused women are going to become lone parents. We know that in itself no recourse to public funds and limited recourse to public funds plunge women into poverty and more poverty.*
> Pragna Patel, Director Southall Black Sisters[56]

Cuts to housing benefit may make it harder for women to move area to get away from an abuser. People under 35 will only be entitled to housing benefit to meet the costs of a room in a shared house. This may require women to move in with people they do not know and is likely to be particularly problematic for women who have experienced violence or abuse.

6.6 Overall Financial Impact on BAME Women of Cuts and Additional Charges

Many BAME women are losing a range of benefits and other entitlements, as detailed elsewhere in this report. BAME women with insecure immigration status may also incur other costs that British citizens do not have to meet. For instance they may have to find money to pay for a lawyer to advise them on

their legal cases. Administrative requirements for these women also mean that they incur costs and charges that are significant to those women living on the poverty line. For instance, the Border Agency has a requirement that, as part of the immigration process, people have photos taken of their retinas. Each process like this incurs costs.

> *We have to take the women to Birmingham or Leicester where there are main Post Offices.*
> Manager, Panahghar.[57]

It is therefore important that the impact of additional costs and charges are monitored and reviewed from the perspective of their impact on individual BAME women, some of whom will already be facing financial problems. These financial problems exacerbate existing problems of violence as detailed above.

6.7 Human rights and equalities impact

Violence against women is clearly a human rights issue. Public authorities also clearly have obligations to tackle domestic, sexual and other forms of violence against women under Article 2 (the right to life), Article 3 (the prohibition of inhuman and degrading treatment) and Article 14 (the prohibition of discrimination) of the European Convention on Human Rights.[58]

Domestic and sexual violence also disproportionately affect women. The adverse impacts on women of being victims of domestic violence can be extremely severe – physical and mental suffering that destroys women's lives. Therefore public authorities should see tackling domestic violence as an important priority in terms of their duties to eliminate discrimination and promote gender equality.

The potential deterioration of services that has been catalogued above therefore raises serious human rights and equality concerns in terms of public authorities' duties to protect BAME women from domestic violence and ensure that those who have been victims are appropriately supported.

6.8 Monitoring

All relevant public authorities should collectively review how the cumulative effects of cuts outlined above will affect their ability to effectively tackle violence against BAME women and take action accordingly.

The impact of the cuts on BAME women's safety should be monitored on an on-going basis including:

- The level of violence against BAME women and whether this is increasing/ decreasing.
- The number of successful prosecutions of violence against BAME women.
- The degree to which services are able to meet the needs of BAME victims of violence including shelter, counselling and other forms of support.
- Whether changes to benefits, legal aid and other forms of support are constraining women from leaving violent relationships or otherwise negatively impacting upon them.

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7. Health

7.1 Overview

BAME women in Coventry are being affected by cuts to spending on Health. The NHS is required to make savings of up to £20 billion by 2015.

BAME women in Coventry are already experiencing, and are likely to continue to experience, loss of both specialist and general health care services. While these cuts affect both women and men and all ethnic groups, BAME women already have worse health outcomes than the general population and are more likely to have longer term illnesses.

Increased waiting times, increased cancellations of appointments and increased pressure on staff and volunteers were all issues that were highlighted as having a significant impact on some BAME women interviewed for this report. A number of BAME women also raised concerns about the difficulty they faced in accessing translation and interpretation services when accessing healthcare, their ability to communicate effectively with healthcare professionals and their privacy. Cuts and potential future cuts to maternity services were also raised as an issue. There were also concerns about violence against BAME women going undetected.

Although BAME women as a whole experience worse health outcomes than the general population, the experience of women from different minority ethnic communities varies significantly. Where possible we have highlighted the ways in which cuts will affect specific communities. However, as explained in the introduction to this report, data broken down to this level is not always available.

7.2 What Cuts are Happening?

7.2.1 NHS Nationally

The NHS is expected to make savings of up to £20 billion from 2011 to 2015.[1] Although the Government has argued that these savings can be achieved through efficiencies, our previous work on the impact of the cuts in Coventry has shown that there have been cuts to services and job losses.[2]

7.2.2 NHS locally

University Hospital Coventry and Warwickshire are required to make further cuts of £41M for 2013/14 after making cuts of £56M in the previous two years.[3]
The number of hospital beds has fallen in the last few years. At the University Hospitals Coventry and Warwickshire NHS Trust there were 1158 overnight beds in the period October-December 2010. This had fallen to 1125 in January-March 2013. In the same period the number of beds at the George Elliot hospital fell from 348 to 324.[4]

7.3 NHS National Changes

The Health and Social Care Act 2012 abolished Strategic Health Authorities (SHAs) and Primary Care Trusts (PCTs) in April 2013 and replaced them with Clinical Commissioning Groups (CCGs) whose purpose is to commission most NHS services, supported by and accountable to the NHS Commissioning Board.[5]

Services will be provided by a range of providers including private or charity/ voluntary sector organisations. Voluntary and community organisations that had previously been funded by the PCT will have to compete with commercial providers under the new tendering arrangements.[6]

Local Authorities will take over responsibility for public health from PCTs. To provide integrated response to local public health and social care delivery, Health and Wellbeing Boards (HWBs) are set up by Local Authorities. They will be responsible for Joint Strategic Needs Assessments (JSNAs) and Joint Health and Wellbeing Strategies.

The cost of the programme is £1.4bn and it is expected that more than 20,000 management and administration staff will be made redundant from health authorities, PCTs and the Department of Health.[7]

It is too soon to assess the impact of these changes on BAME women, however we believe it is important to monitor the impact of these changes on both patients and those working in the health service.

7.4 BAME Women and Health – the context

Although the cuts described above will affect all NHS patients and staff, they will have a particular impact on BAME women because their health issues and experiences of health care differ to that of white women. BAME women (and men) have an increased risk of living in poverty and there is a strong link between poverty and poorer health outcomes.[8] BAME women in Coventry are disproportionately likely to live in the poorest

wards in the City (see chapter on Housing). There is an eight year gap in life expectancy between people living in the poorest and richest wards in the City. In Coventry, residents from Indian and Black Caribbean ethnic groups are more likely to say that they are not in good health than residents from the White British group (10%, 12% and 8% respectively).[9]

National Data in Relation to Health Issues for BAME Communities/Women

National data shows that:

- BAME women are more likely than men to suffer limiting long-term illness.
- Pakistani and Bangladeshi people were most likely to have long-term illness, followed by Black-Other, Black-Caribbean and Indian people.
- Heart and circulation problems are more common among Black Caribbean women than white women.[10]
- Young Black (African Caribbean and Black other)[11] females were at increased risk of self-harm and were more likely to be unemployed and report housing problems compared with white women.[12]
- People with a South Asian background are six times more likely and people with an African-Caribbean background are five times more likely to have Type 2 Diabetes than their white counterparts.[13]

There is national evidence of problems faced by BAME women (and men) in accessing health services.

- Scope found that many of the one million disabled BAME people in the UK face barriers such as language and inability to understand technical, medical or bureaucratic language.[14]
- BAME clients who self-harmed were less likely to receive a specialist psychiatric assessment and psychiatric follow-up services than white clients.[15]
- The Women's Health and Equality Consortium has concluded that BAME women, asylum seekers and refugee women along with teenage mothers and women living in poverty generally receive poorer quality maternity services.[16]

7.5 What is the impact on BAME Women in Coventry?

As a result of the cuts to health spending a number of problems and delays to services have been observed which raise particular concerns about the treatment and healthcare outcomes of BAME women. These include:

- Increased waiting times
- Increased cancellations of appointments
- Increased pressure on staff and volunteers
- Lack of access to interpretation services
- Cuts to maternity services
- Violence against women going undetected

Each of these issues is discussed in turn below.

7.5.1 Increased waiting times

Our previous report on the impact of the cuts on older women showed an increase in hospital waiting times in Coventry over the period 2011-2012.[17] Since then waiting times at the George Elliot hospital have increased still further, from 9.1 weeks in February 2012 to 10.2 weeks in March 2013. Waiting times at the University Hospitals Coventry and Warwickshire NHS Trust have fallen back from 6.4 weeks in 2012 to their 2011 level of 5.9 weeks.[18]

Waiting times in Accident and Emergency in University Hospitals Coventry and Warwickshire are longer than the national average. In the last quarter of 2012/13 only 84.7% of patients attending A and E were seen within the target time of four hours or less, compared to a national average of 94.1%.[19] A spokesperson said that they were 'aware of the situation and working to improve the figures'.[20]

The issue of long waiting times for appointments and long waits in A and E was raised repeatedly in interviews and focus groups carried out for this report. The majority of those interviewed mentioned increased waiting times for appointments, and longer waits when they did attend hospital. Some reported that despite being referred by their GP to see a consultant they could wait 2-3 months and still not receive a letter or an appointment. One woman said:

> *I was given an hospital appointment that was 6 months away. I phoned up the hospital and advised them that I was not happy to wait six months to be seen by a consultant. I was advised that they could not do anything about it. I had to be really firm and demand an earlier appointment within a 3 month timescale. I don't feel that I should have to beg to see a consultant.*[21]

Women in all the focus groups also mentioned the difficulty of getting an appointment with their GP. Several mentioned the difficulty of phoning at a particular time, being kept on hold for a long period only to find out that there were no appointments available for that day.

> One woman said *'you can wait five days to see your GP'*. Another was so vexed by her experiences she was moved to say *'you will be dead before you get an appointment.'*[22]

Several women in different focus groups reported attending the local drop in centre rather than the GP surgery because they would be seen more quickly. However, this often required partners or children to take time off work to drive them, or expensive taxi fares.

7.5.2 Increased cancellations of appointments

Our previous report highlighted an increase in the number of appointments cancelled between 2009/10 and 2011/12. This trend has continued. In 2012/13 135 appointments were cancelled at the George Elliot hospital, up from 115 in 2011/12. In the same period the number of cancellations at the University Hospitals Coventry and Warwickshire NHS trust rose from 575 to 667.[23]

Women in the focus groups complained that not only were appointments being cancelled but that they often did not find out that the appointment had been cancelled until they arrived at the hospital. One woman described the situation she faced through an interpreter:

> *She had to ask her daughter to take time off work to interpret for her at a hospital appointment. She did not want to ask her son because of the personal nature of the condition. When she got there her daughter explained that the appointment had been cancelled. She was very distressed because she had to wait a long time to get the appointment, her daughter has had to take time off for no reason and she has had to pay travel costs.*[24]

Another said:

> *I was due to go into hospital as an inpatient on the Monday but I was notified literally on the Friday before that my appointment had been cancelled. At this stage I had made childcare arrangements which had taken me months to sort out with other family members who also had to make arrangement to accommodate me.*[25]

Another described the situation faced by her daughter:

> *My daughter had a hospital appointment for my granddaughter. On arriving at the clinic reception she was advised that her appointment had been cancelled. She was also advised that a letter had been sent to her notifying that the appointment had been cancelled. She stated that she had definitely not received a letter. It was only after standing her ground and being adamant that she had not received a letter that the receptionist agreed to check the system and then agreed that a letter had in fact not been sent. She also incurred car parking charges along with the inconvenience of taking time off work. A staff member then advised my daughter that the same thing had happened to her.*[26]

7.5.3 Job losses

Between 2010 and 2012 there has been a loss of 6,082 qualified nursing staff nationally so that total staff figures have gone from 375,950 to 369,686.[27]

Women make up nearly 90% of all qualified nursing, midwifery and health visiting staff.[28] Nearly 20% of all qualified nursing, midwifery and health visiting staff are from an ethnic minority background, which represents a higher proportion than the population demographics for England and Wales in the census of 2011.[29]

The numbers of female medical and dental professionals (excluding other doctors in training) in lower grades have reduced each year since 2010.[30] 23% of all UK qualified medical, non-dental professionals are from an ethnic minority background.[31]

7.5.4 Increased Pressure on staff

All the focus groups raised concerns about NHS staff being 'overstretched'. This had an impact on quality of care, with increased mistakes, such as failure to inform patients of cancellation of appointments:

> *The breakdown of communication within the NHS is getting worse and the service is getting leaner and leaner.*[32]

In addition, several of the groups raised the fact that they felt increased pressure on staff had an impact on the way they felt they were treated:

> *There is no longer a patient centred approach. People are being treated differently – no one seemed to really care.*[33]

Several women in focus groups reported that they experienced racism in hospitals and walk-in centres. For example, one woman said that she was spoken to less favourably than a white patient, leaving her feeling 'degraded'.

Another said:

> *I have found some of the reception staff at hospitals very rude.....if I don't understand what they have said they have rolled their eyes at me. It is harder to get interpreters now and the staff are not well trained to deal with or understand Asian women.*[34]

While it is not clear whether these instances were a result of the cuts, there was a widespread feeling among focus groups participants that incidents like this are becoming more prevalent. The seriousness of this issue means that it warrants further investigation.

7.5.5 Loss of interpretation services

Loss of interpretation services featured highly in our research. We were informed by Coventry City Council that:

> *Interpretation and translation services will continue to be provided where appropriate either via UHCW or Coventry City Council's Coventry Interpretation and Translation Service dependent upon a referral and request being made.*[35]

However women in the focus groups raised issues in relation to lack of interpreters at GP surgeries. They also raised the issue of pressure from health professionals for women to use family members as interpreters. This suggests that either translation services are not available or that the women concerned did not know that they were entitled to request them.

A recent study in Coventry of women's experiences of breastfeeding support services revealed that BAME women who gave birth at weekends or in the evenings also commented on the lack of interpreters.[36]

Women in the focus groups raised a number of issues as a result of lack of interpretation services and languages barriers. They include:

- Due to additional time it takes for interpretation, medical professionals' responses were shorter meaning that there was little time for further conversation to explore other options.
- Receptionists were unable to understand their spoken English, which increases the difficulty in making an appointment.
- Difficulties with children acting as interpreters - These included embarrassment at loss of privacy and not informing doctors of symptoms because of embarrassment about relaying personal medical information to their children.
- Where husbands acted as interpreters there were concerns about the control this gave them over the information that is passed on to the doctors. Doctors may lack the time to question and seek more information.
- Concerns about the accuracy of the interpretation and translation and worries about whether there was a complete understanding of the patient's medical issues.
- Children were missing out on education because of having to interpret at medical appointments.[37]

The risk of husbands acting as interpreters was highlighted by one case described by a support worker working with BAME women:

> *One woman managed to tell her GP that she wanted to see him on her own; away from her husband who was then told to wait in the waiting room. She disclosed (Domestic Violence) to her GP and the GP helped her by calling the police. She never went back to him.*[38]

The issues raised by these women pose serious concerns about how any losses of interpretation services are affecting medical outcomes for BAME women. There are also concerns about their right to privacy, and the impact on their children's education.

7.5.6 Maternity services

There have been some increases in funding to maternity services. University Hospital Coventry has recently received funding of approximately £750K for upgrades to the maternity unit.[39]

However, at the same time there are concerns about maternity services that support BAME women. The Coventry study cited above of women's experiences of breastfeeding support services revealed that BAME women who gave birth at weekends or in the evenings commented on a lack of staff and interpreters.[40]

Women in the focus groups raised problems with maternity services because of language barriers and lack of translation services. In particular they were concerned about:

- Not knowing the processes relating to maternity care and so missing antenatal appointments and scans.
- Not realising that they had to bring their own formula milk into hospital if they wished to bottle feed their babies.

Foleshill Women's Training's MAMTA Programme has been widely recognised as a significant success with over 18,000 interventions made. It was cited as a good source of support and a good service for BAME women on breastfeeding and post natal support, as well as supporting women successfully with midwives in the antenatal period.[41] However, funding for this project is not guaranteed beyond March 2014.

One support worker with traveller communities raised concerns about the implications for women from this community when maternity services are cut:

> *It will only be through emergency or childbirth that people seek medical advice. Even having a community midwife to come to the site to talk to the mum only happened once, but it was fantastic for the women. Any cuts to maternity services will have an impact.*
> Claire Nash, Support Worker, Grapevine.[42]

7.5.7 Violence against women going undetected

Cuts to health services can reduce the opportunities for uncovering violence and abuse suffered by women. Pragna Patel from Southall Black Sisters has highlighted the implications of cuts to maternity services for the detection of violence against women:

> *Domestic abuse is more prominent in pregnancy and women in abusive relationships are more at risk whilst pregnant. A significant proportion of cases of domestic abuse are reported during pregnancy. Women have to attend ante-natal checks and so it provides opportunities for domestic abuse to be detected. Closure of A+E and maternity services means that women will not be able to disclose domestic abuse and if they don't disclose they can't report it and without proof, services cannot be accessed.*
> Pragna Patel, director, Southall Black Sisters.[43]

Often domestic abuse is disclosed at Accident and Emergency Services, sometimes after women have tried and failed to get help elsewhere:

> *Through my experience we get a lot more referrals from A+E; not many from GPs - we have known some to even refuse to help. One woman told her GP and the GP told her she didn't know how to help her. This woman ended up in A+E with a broken arm as a result of the violence from her husband. A+E staff called social services and she was referred to the refuge.*
> Support worker with BAME women.[44]

However, with staffing cuts and increased pressures on Accident and Emergency services domestic violence and abuse risks may go undetected. A similar problem is likely with Female Genital Mutilation (FGM) where detection and provision is mainly provided within healthcare. Staffing cuts will inevitably mean less scrutiny, which may mean that FGM goes undetected. Pragna Patel, of Southall Black Sisters warns:

> *Medical services are the first port of call for many BAME women. Medical professionals can assess the situation, for example a child who has undergone FGM may have symptoms of a high fever and infection.*[45]

7.6 What will be the human rights and equality impacts?

Cuts to healthcare spending will affect women from all ethnic groups. However, BAME women have historically tended to have worse health outcomes than men so may be disproportionately impacted by some cuts. In addition, as our research has shown, cuts to translation and specialist health have a disproportionate impact on BAME women. When these cuts are combined with race and sex discrimination and cuts to other services they could have a significant impact on the right to health of some BAME women.

Many of the experiences of women interviewed for this report raise human rights concerns including:

- Delays in treatment – Increased waiting times and cancellations of appointments can lead to delays in treatment. This may mean patients suffering longer and may impact on eventual health outcomes with negative impacts for patient's right to health and even their right to life.
- Lack of translation services – A lack of translation and interpretation services may lead to BAME women not getting the healthcare that they need. Again this can affect health outcomes and associated human rights. The expectation that family members will provide translation services may lead to violations of the right to privacy of patients.
- Violence against women going undetected - Violence against women is a serious violation of their human rights. Southall Black Sisters and others have highlighted the importance of health services in identifying cases of violence and providing signposting to appropriate support. Cuts to staffing levels and reductions in training may reduce the detection of violence against BAME women.
- Incidents of racism- Women reporting incidents of racism within health services is concerning and requires further investigation.

7.7 Monitoring required

The potential impact of cuts not only to health but to social care and other services, combined with the fact that BAME women in many cases suffer worse health outcomes than other groups, means that it is extremely important to monitor the actual impact of the spending cuts on BAME women.

In order to assess the on-going human rights and equality impacts on BAME women of cuts and changes to health care identified in this report, the following areas should be carefully monitored in Coventry:

- The length of waiting times and number of cancellations of appointments with GPs and at hospitals of BAME women as compared with other groups of patients.
- The impact of lack of access to translation and interpretation services on BAME women's access to healthcare and privacy.

Further investigation should be carried out into the reports made by women interviewed for this report of racism within health services, and this should continue to be monitored in order to ascertain if incidents of racism are increasing.

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8. Social Care

8.1. Overview

Cuts to Council budgets have led to cuts for funding for social care in Coventry and across the UK. As with our previous reports, the agencies we interviewed for this report argued that the situation in Coventry was better than in many parts of the country. However, concerns were still raised in relation to services going to the cheapest provider, reduction in level of services, loss of specialist provision for BAME women, increased pressure to provide unpaid care and incidents of discrimination in social care services.

Expenditure on social care, in Coventry, in 2011/12 increased as did the total number of weeks of care provided. However, this increase comes after a decline in spending the previous year and a national context of underfunding of social care over many years.[1] Of more concern are the planned cuts that mean overall council spending on all services will drop from £929 per person in 2010/11 to £717 per person by 2015/16.[2] In this context it is likely that there will be further cuts to spending on social care in future years.

These cuts and changes will affect both women and men from all ethnic groups in Coventry who either need or provide care. However, there may be particular impacts on BAME women who provide proportionately more care. Research by Carers UK shows that there are around 500,000 BAME carers in the UK and that they provide proportionately more care than white carers.[3] Coventry Carers Centre has over 14,800 carers registered and provides active support to over 7,200 of whom 30% are BAME.[4]

Several of the agencies we spoke to for this chapter preferred not to be named or did not want particular comments attributed to them because of the potential impact on their work. To protect them we have made all of the comments in this chapter anonymous.

8.2 What cuts are happening?

8.2.1 National

A survey by the Association of Directors of Adult Social Services in April 2013 of 152 top-tier social services authorities found that £800M was being cut from their budgets in the year to April 2014.[5]

A survey of 81 local authorities by The Guardian warned that services to vulnerable people will be closed as councils will have lost a third of their budget by 2015.[6] 23 out of 42 councils who responded stated they have introduced new charges or have increased charges for some adult care services.[7]

Since the start of the austerity programme savings of 20% have been made, mainly due to "providing different, more cost effective packages of care, or reduced levels of care, to many elderly or disabled people."[8]

One study has suggested that nationally approximately 105,000 disabled people will be without vital care and support by 2015.[9]

8.2.2 In Coventry

As with our previous reports, the agencies we interviewed for this report argued that the situation in Coventry was better than in many parts of the country. One agency said that:

> *The situation is much worse in Birmingham and Warwickshire; their care packages have been drastically cut.*[10]

In our previous report we highlighted a fall in expenditure on residential care, nursing homes and home helps for adults between 2010 and 2011 from £67,599,000 to £65,774,000 (a 2.7% reduction).[11] In 2011/12 expenditure on social care increased to £69,866,000 (a 6.2% increase).[12] The total number of weeks of care provided increased from 96,758 to 105,921. Expenditure on home care also increased from £30,745,000 to £31,085,000 (a 1.1% increase).

The City Council's funding for personal budgets (where individuals control their own budgets and make decisions about what services to purchase) has been cut from £26.6 million in 2011/12 to £24.5 million in 2013/14.[13]

Coventry City Council's Community Services Directorate needs to find savings of £14m for 2014/15, rising to £22.5m by 2015/16, in order to meet its share of the reductions in local authority funding and also due to pressures on demand through an ageing and changing population.

At a Voluntary Action Coventry meeting on 27 March 2013 a set of proposals currently being considered to make savings for 2014/15 were set out as follows:

- Adult social care information & advice - £120k
- Housing related support - £1.5m
- Payment of the Aylesford reablement service through Health - £900k
- Reablement – home support - £2.3m
- Day opportunities & transport - £500k - £1m
- Housing with Care schemes - £400k[14]

Overall council spending on all services will drop from £929/person in 2010/11 to £717/person by 2015/16.[15]

The Coventry Telegraph has reported planned cuts to care homes, day centres, on-site wardens in sheltered accommodation and funding for voluntary organisations supporting people needing care and carers.[16]

8.3 What is the impact on BAME women in Coventry?

Our previous report highlighted that Coventry was generally considered to be doing better than other authorities in the region in terms of social care, but warned that despite this the cuts to funding were likely to lead or were leading to a range of impacts including:

- Increased charges for services
- Staff cuts
- Reduction in level of services
- Services going to the cheapest provider
- Reduction in staff training
- Potential decline in future standards of care[17]

BAME women in our focus groups and interviews for this report raised a range of current problems and potential future problems as a result of the cuts to social care including:

- Services going to the cheapest provider and reduction in level of services
- Loss of specialist provision
- Increased pressure on family members to provide unpaid care
- Increased pressure on staff

Any problems identified at this stage need to be monitored very carefully, as they are likely to be exacerbated by planned cuts over the next few years.

8.3.1 Services going to the cheapest provider and reduction in level of services

Our previous report included concerns from agencies providing care that the guide price for contracts from Coventry City Council was below the level at which they could provide a reasonable standard of care. Coventry City Council offer a range of services within a price bracket and argue that services provided will be the most appropriate for that person, rather than the cheapest provider.[18] However several women in our focus groups who either needed care, or had a family member needing care, complained of a drop in the standards of care they received, which they blamed on the need to cut costs:

> *The council is looking for cheaper and cheaper agencies. I find it difficult to get the agency to do more than a cup of tea in the morning.*[19]

As with the previous two reports Coventry City Council staff have told us that criteria for receiving social care have not been changed arguing:

> *Eligibility under Fair Access to Care services criteria has not changed from substantial to critical, but there are some services which we currently fund through Housing Related Support where people would be classified as having moderate to low needs, and therefore won't be eligible for Council care services at this stage.*[20]

However, in researching these and the previous two reports we have repeatedly been told by individuals and a range of agencies working in this area that informally the criteria for accessing services has become more stringent and that it is harder for individuals to get the social care support that they feel they need.

> *I have had my care package for 3 years and now it is more much difficult to get that same level of care. Shopping and cooking is not considered a need.*[21]

One worker at an agency in Coventry said:

> *We are seeing that only high end service users or carers are getting benefits and social care support. What was high end needs is now categorised as medium and what is medium is now lower end support. Lower end support is diminishing and no benefits or social care support is given.*[22]

Another said:

> *We feel criteria have tightened or seem harder to reach. There are more questions and evidence being sought in order to get a full picture of people's lives.*[23]

8.3.2 Loss of specialist provision

Specialist voluntary agencies working with BAME women have seen their funding cut over the last few years as a result of cuts to both NHS and Council funding, reducing the level of specialist services available (see Voluntary Organisations chapter). In addition, staff cuts and reduction in training mean that it is likely front line staff will be less aware of the specialist services that are available, as one worker identified:

> *It is true (with the cuts) that front line staff won't know about specialist services and with the loss of specialism you lose the years of trust that has been built.*[24]

Specialist services that were culturally sensitive to the needs of different communities were raised as a priority by both agencies and individual women in Coventry. One woman said:

> *It is more to do with culture than language. With personal care it is personal and you want someone who knows how things are done culturally and don't have to keep explaining things.*[25]

Agencies raised concerns that as a result of the cuts these specialist services will be lost:

> *Professionals who are working with BME groups/communities have to wear several hats to meet the needs of this group due to cultural and language barriers. We respect their background and work a bit extra to get them to access the services. The impact on any organisation is the frustration of not being able to help those individuals. The services offered following the cuts will be tokenistic. Once again the elderly BME population who have worked so hard to build the country's economy will end up with little or no services.*
> *I wouldn't be surprised if the funding gets reduced and the BME Support will be the first to go specifically in third organisations.*[26]

8.3.3 Increased pressure on family members to provide unpaid care

We found a number of women in the focus groups reported increased pressures to provide unpaid care for family members. A support worker working with carers highlighted the fact that cultural expectations could make these pressures worse for BAME women than for white women:

> *In BME households with extended families people are brought up with the values to look after each of their sick family members. If the parents are elderly they expect siblings to look after their disabled siblings. Many of these find it difficult to strike the balance between caring and continuing with their jobs. This causes tension and compounds the further stress to carers.*[27]

Women reported feeling that they were 'taking most of the pressure' and 'expected to do it all'. At the same time, as highlighted in our previous report, agencies working with older Asian women reported that they sometimes did not get the care they needed because of an expectation that there would be care provided by the extended family:

> *There is an assumption that there is an extended family that will care for people but . . . often the family network is not there, but they don't want to admit it is not there. They are sitting at home alone without the help they need. This will lead to greater ill-health.*[28]

8.3.4 Increased pressure on staff

A belief that staff were under increased pressure and that this was having an impact on the quality of care, and of treatment of service users was a recurring theme by workers in social care as well as interviewees from focus groups. In some cases this was identified as an issue of possible discrimination. Some women in focus groups complained that they were treated differently from white people in the way they were spoken to. One worker in a voluntary organisation talking about her experiences with Social Services regarding treatment of one of her service users said:

> *I work with some African and African Caribbean women. There is one mother who was not happy with standard of service for cleaning her daughter. She complained that the quality of service was not good enough. But Social Services were not happy despite the evidence. I told Social Services there is a genuine issue you need to investigate because it looks like it is out and out discrimination.*[29]

While these may be isolated incidents, individuals reporting incidents of discrimination within social care services are particularly concerning and requires further investigation.

The City Council has said that:

> *Any formal individual complaint about services will be dealt with in accordance with the Council's procedures as appropriate. Therefore all formally reported incidents involving Council services are investigated and the outcomes of these are addressed within the relevant services.*[30]

This formal reporting procedure however may not identify whether there is an increase in incidents that are not reported but are nevertheless distressing to those concerned.

8.4 What are the human rights and equalities impacts?

Cuts to social care funding that affect family carers will have a disproportionate impact on BAME carers who provide more care on average than white carers. Reductions in paid care services will lead to increases in caring responsibilities for these women.

Cuts to specialist services, or lack of awareness of specialist services, may mean that BAME women are unable to access the services they need.

Particular attention needs to be paid to these issues in view of the planned cuts to social care spending in Coventry over the next few years. Poor quality of care caused by cuts in spending may amount to an abuse of the human rights of those affected.

Research by leading care charities has previously found that cuts to services and increased care charges has led to extensive problems for families involved in giving and receiving care, including inability to afford essentials like food and heating; deterioration in individuals' health; and struggles to retain independence and remain in employment.[31] To the extent that current and future cuts and changes to services have these types of effects on carers and those receiving care, there are clear human rights implications.

Rights that may be engaged include the right to private life, right to health, and the rights of disabled people to independent living.[32] In extreme situations, for instance if those receiving care are not able to obtain sufficient food and drink, individuals could even find themselves in situations that constitute inhuman and degrading treatment or threaten to violate their right to life.[33]

Women in the focus groups complained about being treated differently from white people in the way they were spoken to and the quality of services they received. We could find no research investigating this issue in Coventry but the seriousness of the complaints and their repeated nature means that this is an issue that needs close monitoring.

8.5 Monitoring required

In order to assess the on-going human rights and equality impacts on BAME women of cuts and changes to social care, the following areas should be carefully monitored in Coventry:

- The quality of care of BAME women in residential and home care and the degree to which it meets human rights standards.
- How changes and cuts to services, staffing levels and training impacts on the quality of care and the ability to meet human rights standards.
- The degree to which any reductions in access to support services or increased charges for those with care needs has an impact on their human rights.
- Any changes in access to specialist services for BAME women.
- Further investigation should be carried out into the reports made by women interviewed for this report of discrimination within social care services, and this should continue to be monitored in order to ascertain if incidents of discrimination are increasing.

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9. Legal Advice Services

9.1 Overview

This chapter sets out the impact of the cuts to civil legal aid on BAME women in Coventry. Legal advice services in Coventry and across the Midlands are facing cuts to the funding they receive for taking on civil and criminal law cases. Key services such as Coventry Law Centre and the Citizens Advice Bureau are facing cuts, as are local solicitors' firms who undertake legal aid work. The cumulative effect will be a great decrease in the amount of expert advice available.

In this chapter we focus on civil legal aid. This is because cuts to civil legal aid will have a disproportionate impact on BAME women. Women are more likely than men to be affected by the changes to civil legal aid and the cuts are also disproportionately affecting BAME communities.

Some BAME women are particularly likely to need legal advice in areas where legal advice services are facing severe cuts. In particular we identify specific issues for BAME women as a result of cuts and changes to funding in relation to cases of domestic violence, employment, immigration and asylum, and welfare benefits issues.

Changes to the way in which individuals access legal advice, such as the introduction of a telephone gateway for some legal advice services, also create a barrier for some BAME women who may not be fluent in English or have the confidence to explain their case over the phone. Future proposals for cuts and changes, including changes to judicial review and a proposed 12 month residency test, will create further serious issues for some BAME women.

There are a range of human rights concerns raised by a lack of availability of legal advice in complex and difficult cases, and by concerns about advice 'deserts'.

9.2 What has changed?

9.2.1 Changes that have already happened

Since 2010, the Government has introduced a number of changes that have radically altered the way in which the State funds civil legal advice.

In 2010-2011 the Government introduced a 10% fee reduction for all civil and family legal aid fees.[1] On 1 April 2013 the Legal Aid, Sentencing and Punishment of Offenders Act 2012 ("LASPO") came into force. This legislation introduced extensive changes to the way that civil legal aid is funded and delivered, and cuts funding for legal advice in many areas.[2] This enabled the Government to cut £350 million per year from its annual £900 million civil legal aid budget.[3]

The introduction of LASPO has changed:[4]

- The scope of legal aid (what cases are covered by legal aid).
- Eligibility criteria (who will be able to receive legal aid).
- Access to legal aid (the procedure by which you access legal advice).

Scope – The cases now covered by legal aid

Since April 1 2013 legal aid funding has been cut in the following areas that are particularly relevant to BAME women:[5]

- Asylum – Legal aid is now only available if you are applying for asylum in the UK.
- Debt – Legal aid is now available only where a person's home is at 'immediate risk'.
- Education – Funding is only now available in cases involving special educational needs. Appeals against e.g. exclusions, admissions and bullying are no longer covered.
- Employment – Legal aid is only now available in those cases relating to discrimination.
- Family law – Legal aid is now only available in cases of domestic violence - but with a narrow definition of domestic violence or child protection.
- Housing – Legal aid is now only available: where the home is at immediate risk; in cases of housing disrepair that pose a serious risk to life or health; and cases of homelessness or accommodation for asylum seekers.
- Immigration – All immigration cases are now out of legal aid's scope unless the client is detained or is a victim of trafficking. Legal aid no longer covers issues such as applying for citizenship or extending visas. Funding for cases involving refugee family reunion is cut.
- Welfare benefits – Legal aid is no longer available. For example appeals against decisions to reduce or suspend benefit payments or tax credits.

Exceptional Cases Funding – Individuals whose cases are excluded under the rules outlined above may apply for funding from the Exceptional Cases Funding Scheme. The Exceptional Cases Funding Scheme is intended to provide funding in those cases where the failure to provide funding would constitute a breach of the individual's human rights.[6]

There are limits to funding and payment will only be made if the application is successful. Individuals must prove that the withholding of legal aid would make an assertion of the claim "practically impossible", or lead to an obvious unfairness in the proceedings.[7] It will be difficult

to find solicitors who will risk non-payment in these complex cases.

Eligibility - Who can now claim legal aid

- People on benefits and pensioners are no longer automatically entitled to legal aid. Everyone will have their savings and assets assessed.
- People with a disposable income between £315 and £733 a month are required to pay a higher proportion of their legal costs. If your disposable income is £733 per month, or above, you will not be entitled to legal aid.
- Costs to be paid are 35%, 45% or 70% depending on the individual's monthly disposable income.
- People with assets over £3000 (up to £8000) are required to pay towards legal costs.[8]

Access – How you get legal advice

There is a mandatory 'telephone gateway' for debt, special educational needs and discrimination cases. People will have to call a telephone advice line for a referral. They will be 'assessed' by the gateway provider who will ascertain whether their problem is within the scope for legal aid. The person will then be put through to a specialist telephone advice provider who will then decide whether the advice should be provided via telephone and/ or online. Individuals may be referred to a face to face adviser where it is clear that a telephone-based service would not be suitable either due to their personal circumstances (for example a mental impairment) or to the circumstances of their case (for example extreme complexity or the need for emergency assistance).[9]

Individuals will not be able to approach solicitors directly.

9.2.2 Further proposed changes

Reforms to judicial review

In April 2013 the Government published its response to a consultation on its proposals to reform judicial review (see definition below) to limit the number of cases that can be brought and to reduce delays in the system.[10] The majority of judicial review cases relate to immigration cases.[11]

> Judicial review is the procedure by which the courts examine the decisions of public bodies to ensure that they act lawfully and fairly. On the application of a party with sufficient interest in the case, the court conducts a review of the process by which a public body has reached a decision to assess whether it was validly made.[12]

The Government is introducing reforms to the process for applying for judicial review following a brief consultation exercise. The changes are likely to be introduced during summer 2013. The changes include:

- The imposition of a new 6 week time limit for bringing judicial review in planning cases and 30 days in procurement cases.
- Measures that make it harder and more expensive to challenge refusals of full judicial review hearings.[13]

Other reforms to civil legal aid

In addition to these changes, the Government is currently consulting on a series of further changes to both criminal and civil legal aid. In relation to civil legal aid, the suggested changes include:[14]

- Introducing a 12 month residency requirement for those who wish to access legal aid.
- Introducing a lower income eligibility threshold to restrict legal aid to the very poorest.
- Reducing the fees paid to those who represent clients in public family law by 10% and introducing fees for those who wish to apply for judicial review.

9.2.3 Other cuts to funding which will impact legal advice services in Coventry

The funding for the £14m grants programme from the Equality and Human Rights Commission (EHRC) to voluntary organisations to provide specialist discrimination advice, work, education services and advocacy has ended.[15] Coventry Law Centre has lost approximately £70k a year as a result of the cut to this grant.

The EHRC now offers an Equality Advisory Support Service (EASS) to replace the EHRC Helpline. The Service advises on discrimination issues, explains the legal rights and options open to people, directs people to mediation services and helps to determine if people are eligible for legal aid. It does not provide legal advice to individuals or solicitors, provide representation in any legal proceedings or provide advice on the strength of a case.[16]

9.3 Cuts and changes to Legal Advice Services in Coventry

In 2010 it was projected that Coventry Law Centre and the CAB alone would lose legal aid funding for 1256 cases, which equates to a loss of £227,538.80.[17] We could not find any overall assessment of the impact of the cuts and changes to legal advice services in Coventry, including solicitors' firms who undertake legal aid work. However, a recent study identified that the Midlands is particularly poorly placed in terms of the number of services that are under

threat of closure as a result of the cuts to legal aid.[18] The latest position of Coventry Law Centre and the CAB also suggests that these cuts are having serious impacts.

9.3.1 Coventry Law Centre
Coventry Law Centre is losing £200 to 250k a year from cuts to legal aid, which represents a fifth of its annual income. It is seeking to replace this income with funding from Trust Funds and other sources. It is also expanding its family work, which might generate some surpluses enabling other work to be subsidised.

The Law Centre has also lost approximately £70k a year through the cut of the EHRC grant. This funding provided a casework service to approximately 80 people each year (including representation in a tribunal or court) and also enabled awareness-raising work.

Coventry City Council is continuing to fund the Coventry Law Centre and has preserved its grant funding for at least the coming 12 months. This will allow legal advice to be provided in areas where legal aid is no longer available, e.g. welfare benefits appeals and employment cases. However the number of people who can be helped will be reduced, due to the loss of legal aid funding, and so unless alternative funding can be found there will be unmet demand.

9.3.2 Coventry Citizens Advice Bureau
Coventry CAB is losing its funding for legal aid work, which covered one debt caseworker and one welfare benefits caseworker. Coventry CAB's funding from the Money Advice Service continues for another year and it is unclear what will happen after that.

9.3.3 New proposals for legal advice funding from Coventry City Council
Coventry City Council is consulting on a new delivery framework from April 2014, focusing on expanding local provision for welfare benefits and debt, advice to stop issues escalating, co-ordination of volunteering, and producing improved information advising people of advice sessions. The proposals also include a specialist legal advice service and provision for older people.[19]

9.4 What do the cuts mean for BAME women living in Coventry?

Nationally women are more likely than men to be affected by the changes to legal aid. 57% of legal aid clients are women, compared to 43% of men.[20] The cuts are also disproportionately affecting BAME communities. BAME women and men are disproportionately likely to claim legal aid. Of all civil legal aid clients, 64% are white, 26% are BAME (the ethnicity of the remainder is unknown). 31% of those receiving legal advice on education matters are BAME.[21]

We could not find figures for the proportion of applications for civil legal aid in Coventry made by BAME women. However Coventry Law Centre has approximately 920 BAME women clients in a year.[22]

The voluntary organisation Rights of Women has identified the lack of legal aid as a major barrier to access to justice for women:

> *We have conducted two helpline surveys in 2007 and 2011 and both surveys have told us legal aid gives confidence – if women did not have legal aid it would deter them from getting legal redress and taking legal action.*
> Emma Scott, Director, Rights of Women.[23]

The removal of whole areas of civil law from legal aid's scope, and the consequential reduction in the number of providers able to offer legal aid funded advice and representation, means that vulnerable women in Coventry may have to travel further to access advice and representation, and/or may not be able to access advice from their preferred provider. This is likely to impact detrimentally on BAME women who may have particular requirements which dictate their choice of legal adviser; for example needing to access a provider within or outside of their own community for cultural reasons.

Legal advice organisations and agencies working with BAME women also identified a series of areas where BAME women have been particularly affected by the changes to the provision of civil legal aid including:

- The requirement to produce evidence of domestic violence to access funding.
- The withdrawal of funding for immigration and welfare benefits advice and the closure of national agencies which support individuals with immigration issues.
- The impact of the withdrawal of public funding for immigration advice on providers with expertise in asylum law.
- The withdrawal of legal aid for employment issues unrelated to discrimination and the introduction of mandatory fees for bringing a claim to an employment tribunal.
- The introduction of the telephone gateway.
- Future proposed changes, including changes to judicial review and the proposed 12 month residency test.
- There are also likely to be implications for BAME lawyers due to the cuts to legal advice services.

Each of these issues is discussed in turn below.

9.4.1 Domestic violence

Although the Government has stated that legal aid will continue in family law cases for survivors of domestic violence, the requirement to meet the evidence criteria is going to be very difficult to satisfy.[24]

There are particular implications for BAME women. The vast majority of the ways in which evidence of domestic violence can be demonstrated require the reporting of the domestic violence to statutory services such as medical professionals or the police.[25] But research from Imkaan, a black feminist organisation, shows that many BAME have concerns about reporting to statutory services.[26]

Women with no recourse to public funds may claim legal aid in domestic violence cases, but then may not be able to access the necessary documents to support a claim for legal aid, such as bank accounts or passports if they have been confiscated by the perpetrator.

> *Cuts to legal aid and the criteria for women to be able to access legal aid will have a huge impact on our clients. The criteria of having to prove domestic abuse by having had a non-molestation order, reported to police or been in a refuge excludes the majority (70%) of women who do not report their abuse to the police and has an even greater impact on BAME women who have additional language, immigration and cultural barriers to reporting.*
> Elaine Yates, Coventry Haven.[27]

As a consequence of the difficulty of proving domestic abuse, these types of cases are complex and can take a long time to complete.

> *Two hours to form a rapport, assess legal aid eligibility and explain the Immigration system, 2 hours to discuss procedure, the immigration rules and their applicability, 6 hours to take detailed instructions for a witness statement, 2 hours drafting statements, 3 hours in gathering evidential documents to support the application, 2 hours chasing professionals such as police, MARAC DV organisations, G.P, 3 hours considering evidence and drafting legal representations to support application, 2 hours approving evidence with client- complete home office application forms and finalise representations- this amounts to twenty two hours or 3 days effort for a single case if it is done properly.*
> Bushra Ali, Head of Immigration, Thaliwal Bridge Solicitors.[28]

With the cuts to legal aid, finding a publicly funded lawyer is going to be more difficult as the number of cases a lawyer can take has been greatly reduced. These limits are making it harder to find lawyers who are able to take on cases for women experiencing violence, making it harder for them to leave abusive relationships. Panahghar (which provides specialist services for BAME women experiencing violence and abuse in Coventry) are finding that there are fewer solicitors available to support the women who come to its refuges, particularly women without children.

Panahghar has experienced only limited success with protection orders and this tends to be in emergency situations where children are involved.

> *We are talking to different solicitors but no one is looking at single women.*
> Manager, Panahghar.[29]

9.4.2 Immigration and welfare benefits advice

The loss of legal aid for immigration advice impacts BAME women who seek residence in the UK or who have insecure residence status. The change from hourly rates to fixed fees means that many organisations and publicly funded lawyers cannot sustain the level of support required for immigration cases which are more complex and require additional hours of case work. The closure of national support agencies such as the Immigration Advice Service and Refugee and Migrant Justice due to lack of funds has increased pressure on local services. This may impact on BAME women in a number of ways.

The loss of legal aid for immigration advice reduces the ability of BAME women, who have been granted indefinite leave to remain in the UK on asylum grounds, to reunite with members of their family (potentially contravening Article 8 of the Human Rights Act 1998).

A lack of specialist provision for women who have recently been granted asylum, combined with the removal of legal aid for welfare benefits advice and representation, may lead to an increase in cases of destitution amongst BAME migrant women who have recently been granted indefinite leave to remain - see the case study below:

Birmingham Case Study

In 2009, Birmingham Law Centre identified a number of successful asylum seekers who were left destitute as a result of the failure of the Department of Work and Pensions to process their benefit claims in a timely fashion.

Jobcentre Plus had informed these claimants that, as they had not yet been issued with a National Insurance Number, they were unable to claim benefits. Birmingham Law Centre used legal aid to help affected refugees to challenge this decision. They wrote letters to Jobcentre Plus requesting that an interim payment be made to their clients. If this letter did not receive a response within 7 days then a pre-action letter threatening judicial review was sent. Birmingham Law Centre reported: "in every case that we have done this, the problem has been resolved and the benefit put into payment within 7 days."[30]

The withdrawal of legal aid for immigration and welfare benefit matters means that there is now no one funded to write the letters (as described in the above case study) for refugees experiencing problems. Failure to receive benefits in a timely fashion has previously been implicated in the deaths of a woman and her son who starved to death in Westminster having been granted indefinite leave to remain in the UK but unable to access benefits due to administrative delays.[31]

There are also particular issues for BAME women who are likely to be disproportionately affected by changes to the welfare benefit system. Disabled BAME women are particularly badly affected because of the widely recognised flaws in the assessment process for Employment Support Allowance (ESA) and Personal Independence Payment (see Incomes and Poverty Chapter). Representation for appeals in relation to ESA has an enormous impact on chances of success:

> *Representation at appeal makes a significant difference. For example, MoJ statistics for October- December 2012 show that, nationally, 43% of ESA appeals were found in favour of the claimant. At Coventry Law Centre, our success rate for ESA appeals is approximately 90%. Furthermore, an analysis of the outcome for the claimant shows that awards made by tribunals are on average higher for those claimants who are represented. Loss of funding for representation is therefore a significant concern for all claimants, and for those who face language or other barriers the impact will be greater.*
> David Beckett, Welfare Benefits Supervisor, Coventry Law Centre.[32]

Coventry City Council is continuing to fund Coventry Law Centre to provide legal advice in welfare benefit cases, but overall funding has reduced as a result of the fact they no longer receive legal aid funding. At the same time, the number of appeals against welfare benefit decisions the Law Centre has taken has increased by 31% in 12 months. They expect this increase in demand to continue, with implications for the number of cases they can support.

> *We anticipate further increases so although Coventry City Council is still funding us to do this work, without additional funding and with the loss of legal aid we will struggle to represent everyone who seeks our help.*
> Sue Bent, Director, Coventry Law Centre.[33]

9.4.3 Asylum cases

Although asylum cases are still within legal aid's scope, the loss of funding for immigration cases means that there is likely to be a loss of specialist lawyers with expertise in asylum cases because immigration and asylum is often a joint speciality. The charity Asylum Aid argues:

> *Funding for immigration work has long been recognised to cross-subsidise asylum work. The loss of one plank of this funding threatens the existence of legal firms who represent asylum seekers, and the loss of representation to those in desperate need.*[34]

Rights of Women raise similar concerns:

> *This is a real problem because although it remains in scope there are going to be fewer solicitors who can and are willing to take on these cases.*
> Emma Scott, Director, Rights of Women.[35]

9.4.4 Employment

Loss of legal aid and loss of funding from the EHRC will make it harder for women to seek redress in employment cases. This is likely to cause a problem for BAME women facing job cuts and other issues identified in the Employment chapter.

While discrimination cases are still covered by legal aid, people will no longer be entitled to legal advice without first going through the 'telephone gateway'. This will create problems for women with limited spoken English (see below). In addition, fees will be introduced in July 2013 for those wishing to lodge a claim at tribunal. Fees will be levied at various stages of the Employment Tribunal process with claims split into two "levels" as follows:

- Level 1 - straightforward claims (e.g. unlawful deductions, notice pay and redundancy pay) will cost £160 to lodge the claim, with a further £230 hearing fee;
- Level 2 - most other claims (e.g. unfair dismissal, discrimination and equal pay) will attract a £250 fee to lodge the claim and an additional £950 hearing fee.[36]

The case study below demonstrates the way in which BAME women, who are more likely to occupy low paying roles, may be affected by the removal from the scope of funding for representation and advice in relation to employment matters, combined with the introduction of fees for appearing before a tribunal.

Coventry Law Centre Case Study

Client A was assisted by Coventry Law Centre's Employment Law Team prior to April 1 2013. The following anonymous case study is reproduced with the permission of the client:

"Client A works as a checkout assistant in a supermarket and is currently on sick leave. She received 23 weeks of Statutory Sick

Pay (SSP) then no further payments or contact from her employer. This left her with no income and her employer was not responding to her calls. Coventry Law Centre advised her of her legal right to be paid 28 weeks Statutory Sick Pay and then to be provided with an SSP1 form by her employer enabling her to claim Employment Support Allowance. Coventry Law Centre contacted Client A's employer to remind them of her entitlement and request that the matter was dealt with without resorting to a tribunal. The employer then immediately paid all due money, a total of £425.25 and provided the SSP1 form. Client A was very happy, the matter was resolved sensitively and amicably and avoiding unnecessary litigation, meaning that she could return to her job once she had recovered."

Under the new scheme Client A would not be able to access legal advice, would not be able to compel her employer to reply, and would not be able to afford the fees to appear before the Employment Tribunal. Even if she could afford the fee, Client A, as someone who was keen to return to her job once she recovered from her illness, might well be reluctant to initiate litigation.

9.4.5 The Telephone Gateway

The introduction of the telephone gateway for employment, some debt, and special educational needs cases, creates a barrier, particularly for BAME women who may not be fluent in English or have the confidence to explain their case over the phone.

Mosaic profiling (a system for classification of UK households) by Coventry City Council demonstrates that in the most deprived areas of Coventry, where there is the greatest need for advice, more than 50% of households are not able to deal with their issues over the telephone and will need face to face support.[37] These areas also contain disproportionately higher numbers of BAME people.

The introduction of the mandatory telephone gateway and the associated reduction in face to face provision for these areas of legal advice present specific barriers for BAME women. If this approach is extended, it seems likely that any remaining face to face legal aid funded advice will only be viable for delivery through regional or national contracts, with a resulting loss of local face to face advisers. For clients under stress this will offer a much reduced service and it fails to recognise the significant benefits that come from the trust between the client and their face to face adviser.
Sue Bent, Director, Coventry Law Centre.[38]

The Government's own equality impact assessment on the reform of legal aid show that BAME clients are more likely to use face-to-face service provision than the telephone in immigration and asylum, detention and public law cases.[39] Similarly, its analysis shows that women are more likely to use face to face provision than over the telephone advice in cases of domestic abuse, family, public law, housing, and debt.[40] While the mandatory telephone gateway is not yet in place for these areas of law (other than debt), there is the possibility of it being extended into these areas, as the Government is monitoring the impact of the current telephone advice service.[41] This would be a particularly worrying development.

9.4.6 Future changes to funding

The proposed future changes to state funding of civil legal aid creates a number of serious concerns in relation to BAME women. In particular we would highlight concerns over changes to judicial review and the proposed residency test.

Changes to judicial review

Many agencies have expressed concerns about the proposed changes to judicial review and how this will impact upon BAME women and also relevant organisations that provide services to them. The Public Law Project, in their response to the consultation, believes that the reduced time limits will make it more difficult to access justice:

Short time limits adversely impact on access to justice – particularly by vulnerable people and groups who may find it difficult to access information or consult lawyers.[42]

There are implications for BAME women where the specialist services set up to provide support could be under threat. For example, Southall Black Sisters, a not-for-profit organisation meeting the needs of BAME women, brought a successful claim for judicial review against Ealing Council regarding the funding of services for BAME women experiencing domestic and sexual abuse.[43]

With the changes to judicial review, many agencies are concerned that it would be even more difficult for voluntary organisations to bring claims for judicial review within the time limits, particularly if they do not have in-house legal resources, or the financial resources and capability to mount the challenge within six weeks.

The Residency Test

The proposed 12 month residency requirement for those who wish to access legal aid would also have very significant impacts on some

BAME women who are non-UK nationals, as the Law Society's response to the Government's consultation makes clear:

> *[The Legal Aid, Sentencing and Punishment of Offenders Act 2012] recognises that issues arising for the victims of trafficking, and for victims of domestic violence who need to rely on the immigration domestic violence rule, are so significant for victims that they should remain in scope for legal aid even though most other aspects of non-asylum immigration law were taken out of scope….The residence test will mean that virtually all clients who might need to take advantage of these concessions will be excluded from legal aid. Transforming legal aid consultation: The Law Society's response to the non PCT proposals (June 2013).*[44]

9.4.7 Implications for future BAME lawyers

As well as the impact on clients, cuts to legal aid are expected to have a disproportionate impact on BAME women legal practitioners. The Bar Council, in its response to the consultation on the reform of legal aid, warned:[45]

> *[C]uts in family legal aid are likely to have a disproportionate effect on women and Black and Minority Ethnic (BME) practitioners who practise at the family Bar because a higher proportion of women and BME practitioners undertake this work… If women and BME practitioners are discouraged from entering practice in these areas, or from remaining in these areas and developing their practices, the pool of talent from which the judiciary of the future will be drawn will become narrower and shallower, and the objective of making the judiciary representative of the community it seeks to serve will be undermined.*

9.5 Problems faced by those BAME women no longer eligible for legal aid

As a result of cuts to legal aid, some individuals may be forced to argue their cases in court themselves. Senior judges have warned about the consequences this may have for the justice system.[46] Being forced to represent themselves will be particularly problematic for those BAME women who experience language barriers and/or for whom the legal system is unknown and unfamiliar.

In addition, women who have experienced violence but who are still unable to claim legal aid for family law cases because of problems meeting the required standard of evidence for proving violence, may find themselves cross examined by their abuser. This may add to the pressure to withdraw from the legal process.

The Government's aim is for more family law cases to be settled by mediation but this is inappropriate in situations where there has been, or continues to be, violence.

In other cases women may have to pay for legal advice, which they may not be able to afford. Panahghar highlighted cases where women are having to borrow money from family.

> *Most solicitors we are using are charging £500. In one case, the service user's brothers are going to pay. It is a DVA situation and so mediation is not appropriate. If it is domestic violence and abuse, solicitors give them a discount - £500 basic case. If there are complications then it costs more, for example retrieving gold from the husband and in-laws, but this could be done possibly by mediation.*
> Manager, Panahghar.[47]

9.6 Human rights and equality impacts

A disproportionate number of BAME women will be affected by cuts to civil legal aid. This is likely to increase the problems of inequality identified elsewhere in this report because BAME women will have less access to advice services to deal with situations where they are already likely to be disproportionately affected by cuts and changes (for instance, in relation to welfare benefit cuts, employment issues etc.).

There are also many ways in which these changes could lead to negative human rights impacts. For instance:

- "Lack of legal advice could also amount to a violation of Article 6 of the European Convention on Human Rights (right to a fair trial) where "…such assistance proves indispensable…by reason of the complexity of the procedure or of the case."[48]
- Removal of advice on complex welfare benefits issues, housing issues and immigration issues which lead to more extreme problems for BAME women could also amount to human rights violations under Article 3 of the Human Rights Act.[49]
- BAME women in violent relationships face particular issues in obtaining legal aid to fund their cases and lack of funding may lead to breaches of their human rights.[50]
- Liberty, the human rights organisation, has argued that important human rights are at stake in many of the areas of law [that have been removed] from scope. In family and immigration matters, for example, the right to respect for family life is frequently at issue.[51]

It is also argued by Liberty that "the cuts are likely to significantly restrict the local availability of services effectively creating 'advice deserts.[52]

If this were to happen in Coventry then this would be in violation of Article 13 of the ECHR (effective remedy) and the human rights issues identified above would be greatly increased. A recent study identified that the Midlands, as a region, is over-represented nationally in terms of numbers of services that are under threat of closure as a result of the cuts to legal aid.[53]

9.7 Monitoring

In order to assess the actual human rights and equalities impact, the following should be monitored:

- Any decrease (in type and number) of cases brought by BAME women in areas where legal aid is no longer available.
- The impact of changes to scope, access and eligibility requirements on the cases that are brought through the legal aid system.
- Lack of availability of advice for BAME women seeking legal help, and any increase in charges that they face.
- The impact of any of the above on the rights of BAME women.

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10. Voluntary Organisations

10.1 Overview

Voluntary organisations in Coventry that provide services to BAME women have been affected by a combination of cuts to funding and increased demand. These cuts take place against a context of historic underfunding of both women's organisations and specialist BAME organisations, both of which are now disproportionately being affected by cuts to funding.

In some instances BAME women in Coventry may need to access services that cover the wider West Midlands region or national services because of barriers to accessing services locally (for example, a lack of specialist services, or specialist services no longer being funded at a local level). This chapter therefore includes information about the impact of the cuts on national as well as Coventry based services.

10.2 Context of under-funding

These cuts described below take place against a background of historic underfunding of the BAME voluntary sector. A 2012 report by Voice4Change, a membership organisation for the BAME voluntary sector, showed that:

- 81% of BAME voluntary organisations said that income generation was a huge challenge.
- BAME voluntary organisations receive a disproportionately small proportion of charitable funding (3%) and lottery funding (2.3%).[1]

Imkaan, which represents organisations across the UK providing services to BAME women experiencing violence, has argued that:

> *Historically BAME women's VAWG (violence against women and girls) sector has always been underfunded. The cuts are horrendous but for the BAME women's VAWG sector this is not new. BAME services have not historically been recognised by commissioning organisations as priorities for funding.*
> Marai Larasi, Director Imkaan.[2]

A similar pattern has been reported by BAME voluntary organisations in Coventry. One manager of a voluntary organisation, who wished to remain anonymous, observed that:

> *There are an increasing number of hurdles they (BAME VCOs) have to jump through to secure funding. Non-BAME organisations have said that they haven't had to do all of that. There is a view that funders put unnecessary checks in place because they have an inherent lack of trust in BAME organisations. It is felt they request additional evidence, there is more monitoring and that other organisations receive a lighter touch approach. BAME organisations feel they are under scrutiny and judged more.*[3]

10.3 What cuts are happening?

10.3.1 National

The UK voluntary and community sector (VCS) will lose around £911 million in public funding a year by 2015-16. Cumulatively, the sector stands to lose £2.8 billion over the spending review period (2011- 2016).[4] Evidence suggests that those local authority areas with higher deprivation are facing larger cuts in their own funding, for example through the area-based grant cuts in the emergency budget, which may in turn lead to larger cuts to funding of voluntary organisations.[5]

Some services for women have been particularly badly affected by the spending cuts, leading the Women's Resource Centre to argue that women's organisations are seen as 'an easy target' for cuts.[6]

- 95% of women's organisations face funding cuts or a funding crisis in the next year (2011/12) and 25% said that further cuts would result in closure.[7]
- From 2010/11 to 2011/12 31 % of domestic and sexual abuse services experienced cuts to funding.[8]
- 50% of Refuge services had been hit by funding cuts since the introduction of austerity measures.[9]

BAME voluntary organisations, including BAME women's organisations, have been particularly badly hit. A large proportion (53%) of funding for BAME voluntary and community organisations comes from statutory sources so are vulnerable to public spending cuts.[10] For example, Refugee Action has lost 62% of its funding for confidential information and advice service, 50% for its initial accommodation service and 100% for its employment service. Other agencies such as the Refugee Council have lost similar levels of funding.[11] The Equality and Human Rights Commission's strategic grants programme, which funded work with BAME women among others, has been cut.[12]

10.3.2 In Coventry

Coventry City Council has estimated that £2 million of external funding, including legal aid, will have been lost to the voluntary sector by April 2013.[13] In interviews for this and previous reports, voluntary organisations in Coventry identified a series of financial cuts that they are facing:

- A number of funding streams from central Government for voluntary organisations have ended.
- Many charitable and non-charitable organisations are receiving an increasing level of grant applications which means that the success rate for applications is falling.
- Coventry City Council is reviewing its funding of the voluntary sector and is forecasting a saving of £100,000 in 2012/13 and £200,000 in 2013/14. The Council reversed an earlier decision to top slice 3% off all voluntary sector grants but some grants have been reduced or stopped.[14]
- Voluntary organisations that have local or national contracts to deliver public services complain that they are being affected by cuts to spending on public services including the ending of contracts and contracts being put out to tender with an unrealistic guide price (e.g. see Social Care chapter).
- There have been significant cuts to Legal Aid which will affect organisations providing specialist legal advice services and organisations providing more general advice services that refer on to legal specialists (see Legal Advice Services chapter for more information).

10.4 Increased demand for services

Alongside cuts to funding, BAME organisations are facing an increase in demand for services as a result of cuts to welfare benefits and services.

> *We are seeing an increase in referrals from Jobcentre Plus for UK online courses...We have 150 women accessing our services per week - a mixture of new and existing service users but there is no new funding to help BME women who need employment support .*
> Christine McNaught, CEO, Foleshill Women's Training.[15]

Coventry Citizens Advice Bureau (CAB) has faced additional demand for advice with welfare benefits, housing and debt cases. In one example they were faced with an urgent call from a school to provide support to women from the Traveller communities whose benefits were stopped.

> *At one school Roma children were going to school hungry and the teachers phoned CAB and we went there to give mothers information and advice about benefits. There was a crisis identified by the school and a bureau team of advisers was sent to help deal with it. The initial reason for the children going hungry was that all of their parents' tax credits had been stopped and they had no money.*
> Ed Hodson, Coventry CAB.[16]

10.5 The impact of the cuts

Voluntary organisations interviewed for this report detailed a number of impacts on their or other organisations' services as a result of the spending cuts. These included:

- Having to cut services altogether.
- Having to reduce the level of service offered or increase waiting times.
- Having to introduce charges for services, or planning to introduce charges in the future.
- Pressure to cut costs in a way that would impact on the quality of the service offered.
- Closure of the organisation.

Examples of cuts have included:

- Foleshill Women's Training's funding has fallen from £450k in 2010/11 to £190K in 2012/13.
- Panahghar lost its Supporting People contract in Leicester worth approximately £300K per year which meant they lost all their staff in Leicester. This has had a knock on effect on its staffing and service provision in Coventry.
- Coventry Carers Centre has lost funding for work with BAME carers of people with learning disabilities.

10.6 Impact of these cuts on BAME women in Coventry

10.6.1 Loss of Specialist Services

BAME women's organisations provide services and specialist expertise that are sensitive to the experiences of BAME women's lives including multiple discrimination, culture, faith and poverty in a way that mainstream organisations are often unable to match. Fear of discrimination and judgement about a range of issues including their faith, dress and immigration status prevent many BAME women accessing more generic services. BAME women only spaces are important in reaching women who would not otherwise seek support for fear of breaking traditional norms of behaviour.

Foleshill Women's Training (FWT) have recently undertaken a needs analysis and found:

- 98% of women who use FWT do not access services elsewhere.
- 58% of women said they would not access

services elsewhere because FWT are women only and provide culturally appropriate services for women's needs.

FWT understand the cultural barriers BAME women may face and stress the importance of access to women only services. There are cultural barriers which prevent women from going to mixed gender projects.
Christine McNaught, CEO, Foleshill Women's Training. [17]

10.6.2 Loss of specialist provision within mainstream organisations
Organisations like CRASAC that provide services to women, girls, men and boys across Coventry have recognised the need for translation and interpretation services and outreach services to remove barriers to access for BAME communities. CRASAC has seen a 24% increase in BAME women and girls accessing CRASAC's counselling service and a 72% increase to the Independent Sexual Violence Advisor (ISVA) service in the first year of the Access and Equity project.[18] Funding for this work was provided through the Equality and Human Rights Commission grants programme which has now been stopped. CRASAC has prioritised continuing with this work. However it faces a continued struggle for funding.

We have interpreter services that enable us to have access to 29 different languages. If we are unable to continue to get funding for this it would mean no service for a large proportion of our clients.
Diane Whitfield, CEO, CRASAC.[19]

Alongside their mainstream services Coventry Carers provide specialist support to BAME carers. This work is now facing a cut:

The local authority has informed us that their funding for our service will face 22-25% cuts from December 2013. The BAME service is funded by the local authority alongside the generic service, so these cuts will have an impact on the services we will offer to BAME carers in the future.
Uma Sharma, Coventry Carers.[20]

10.6.3 Loss of advocacy and support
The chapter on Legal Advice Services details the impact of cuts to legal advice. These cuts also have a knock on effect on advice and advocacy organisations that do not provide legal advice but refer clients on for specialist legal help. Without this specialist help organisations will be left supporting people who need more specialist advice than the organisation can provide. Coventry Ethnic Minority Action Partnership has warned that cuts to advice services risk women losing out on benefits:

Any cuts in advice services will end up with women having sanctions being imposed, as they have limited means of getting advice and guidance.
Viv Brosnahan, Coventry Ethnic Minorities Action Partnership.[21]

10.6.4 Loss of social interaction
Women in the focus groups frequently mentioned the importance of voluntary organisations as a place to meet and talk to other women. If these groups closed, or had to move services to another part of the city, women were concerned that they would become extremely isolated. Older BAME women in particular complained of isolation, and described the chance to attend activities at voluntary and community organisations as a 'lifeline'.

10.6.5 Services not reaching vulnerable
Voluntary organisations in Coventry raised fears that without specialist outreach services to BAME women many would lack the support to come forward to make their views heard, get the support they need or report violence and abuse:

One elderly woman in her sixties said 'I did not know it was illegal to rape me, I will get protection'. This elderly BAME woman did not know that what happened to her was illegal and it was only because our outreach worker had attended the coffee morning, and supported her, that this was disclosed.
Dianne Whitfield, CEO, CRASAC.[22]

10.7 Barriers to new funding

There is national evidence that BAME organisations find it harder to find alternative sources of funding as 'organisations working with marginalised individuals are unlikely to be able to attract sufficient philanthropic support to be self-sustaining'.[23]

BAME and women's organisations tend to be smaller and so do not have the infrastructure or financial track record to bid for contracts. The Baring Foundation has concluded that:

Commissioning arrangements appear to have had an implicit bias against the voluntary sector, with significant barriers to entry: such as the need for bidders for prime contracts to have delivered similar programmes with a value of £20m; the need for extensive working capital to finance payment by results; and the prohibitive complexity and cost of the commissioning process for many voluntary sector bodies.[24]

Voice4Change have found that 'smaller BAME VCOs who reach groups that the mainstream

organisations cannot [reach], compete in the commissioning market place against larger, better resourced charities.'[25] The Government has been increasingly using a 'payment by results' model for services such a Supporting People (2011) and Families with Multiple Problems (2012).[26] Many BAME voluntary organisations are typically small and less well funded and so will be disadvantaged by this model as they will be unable to bid for these contracts.[27]

10.8 A Case Study of A Coventry Women's Voluntary Organisation

Below is a 'case study' of a Coventry voluntary organisation, Foleshill Women's Training, and how the organisation is trying to survive the current climate of funding arrangements and be sustainable for the future.

Case Study - Foleshill Women's Training

FWT has been run by women for women for over 24 years. It provides social health and economic empowerment (SHE) for women through a combination of training, education, employment and healthcare projects.

It is based in Foleshill, the most deprived ward in Coventry with a higher than average BAME population. It sees 150 women a week at its centre and the same number city-wide across Coventry via outreach in GP surgeries, libraries and other community venues where they can reach women who would not otherwise access services.

Foleshill Women's Training's funding was £450k in 2010/11 and has been reduced to £190k in 2012/13. We have seen an increase in short term contracts e.g. 6 months in duration. For example, we were funded by NHS Coventry to support BAME women to raise awareness of the dangers of smoking and passive smoking. This was only funded until 31 March 2013. We always receive short term funding which makes it harder to demonstrate full impact.

A brand new initiative started in December 2012 to pilot raising awareness of cancer for BAME women and this is funded until 31/03/13. We are in talks to seek commissioning to develop this crucial work.

We have been taking on short term contracts at this time only because we have the infrastructure in place and have specialist staff who have built relationships and expertise to swiftly undertake this work. If staff leave or we lose larger scale funding/commissioning then I no longer have the specialist teams, the infrastructure and the core costs to support undertaking short term contracts. I do 'in kind' support and make these projects happen but I won't have capacity to do this level of work on an on-going basis with reduction in funding.

Three is a huge shift nationally in funding for the voluntary sector. For example, in 2009 we secured Department of Health funding to run a 3 year pre-conception care programme for BAME women. Since 2010 that funding is now only available for national programmes. If you have experience, you can apply but you have to deliver nationally and so it suits larger national organisations. That funding strand is no longer viable for us.
Christine McNaught, CEO Foleshill Women's Training.[28]

Managers of BAME voluntary organisations all too well recognise the challenging times but also are determined to ensure there is a future for BAME services. As one manager put it:

Historically the BME Third Sector has been a very diverse and complicated sector both nationally and locally. However, what binds the sector is it determined response to the inequalities and discrimination that our communities experience. The public cuts will only further increase these inequalities at a time when the sector is facing the most challenging of circumstances. However, as a BME VCO we also know that it is these adverse circumstances that make us stronger and more innovative in the way we respond to discrimination.
Varinder Kaur. Manager of Coventry Ethnic Minority Action Partnership.[29]

10.9 What are the Equalities and Human Rights Impacts?

Voluntary organisations in Coventry that provide services to BAME women are playing many vital roles in Coventry in advancing equality between men and women, reducing discrimination and improving BAME women's rights, including:

- Tackling social, health and economic inequalities through training, education, employment and healthcare projects (e.g. Foleshill Women's Training)
- Tackling domestic and sexual violence and its impact which disproportionately affects women (e.g. Coventry Rape and Sexual Abuse Centre, Coventry Haven, Panahghar, Valley House)
- Working with some of the most vulnerable, isolated and otherwise disadvantaged women in the community (e.g. Coventry Refugee Centre, Valley House, Foleshill Women's Training)

Many voluntary organisations in Coventry are feeling the impact of budget cuts. But this research has provided evidence of how BAME women's organisations and voluntary organisations providing services to BAME women in Coventry are being particularly badly hit. Many of their services are now threatened.

Other chapters of this report catalogue how budget cuts, job losses and other changes in relation to education, employment, domestic violence, care and support services, health services and legal advice threaten to increase inequality between BAME women and other groups. Some even threaten BAME women's human rights.

It is therefore particularly crucial at this time that BAME women's organisations and voluntary organisations providing services to BAME women in Coventry are able to carry on providing these services to the women who use them.

Public authorities should have due regard to the role played by BAME women's organisations and voluntary organisations providing services to BAME women in tackling discrimination and in promoting BAME women's human rights. In particular, they should make any decisions about funding for these organisations in light of the current threats to non-discrimination and BAME women's rights in many of the areas where these organisations work.

10.10 Monitoring

The impact of the cuts should be monitored on an on-going basis including:

- The level of (reduction in) funding for BAME women's organisations and voluntary organisations providing services to BAME women as compared to other voluntary organisations in Coventry.
- The impact of any reduction in funding on these organisations and their provision of services to BAME women.
- The impact on BAME women who have lost access to services or had services reduced.

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11. Cross-Cutting Concerns, Combined Impacts and Actions Required

I'm afraid the cuts show we can't claim to be a humane society. For me it is a moral issue because I think that if you don't look after the most vulnerable then you are not treating people as you wish to be treated yourself – Councillor Alison Gingell – Cabinet Member for health and adult services.[1]

11.1 Overview

Each individual chapter of this report has identified the particular human rights and equality impact on BAME women in relation to a specific area of the public sector spending cuts. We do not repeat those conclusions here. Rather we draw out three overarching issues that are relevant to the report as whole.

First, we identify three cross-cutting concerns that have featured strongly across many chapters of this report; lack of data in relation to BAME women; the impact on some BAME women of the increasing use of technology; and the impact of the public spending cuts on public attitudes towards BAME people.

Second, we consider the combined impact of the public spending cuts on particular groups of women. For vulnerable groups of BAME women it is the combined impact of the cuts that have an especially troubling impact. Here we consider the combined impact of the cuts in relation to BAME mothers, disabled BAME women and BAME women who experience language barriers.

Finally, we identify the actions that are required as a result of the findings of this report.

11.2 Cross-Cutting Concerns

There are some issues that have been identified on a number of different occasions throughout this report. They are worth emphasising in this final chapter because it is only when we reflect upon the individual examples together that we get a full sense of their scale and importance.

11.2.1 Lack of Data

In researching this report we became aware of a number of areas where there is a lack of data broken down by both gender and ethnicity. It was often possible to find data broken down by either gender or ethnicity but not both. Some data on ethnicity was simply divided into 'white' and 'BAME', which hides potentially significant differences between groups and makes it difficult to monitor the situation of white minority ethnic groups (for example people from Eastern Europe). Sometimes the data is not collected, sometimes the sample size chosen is too small to determine impact on ethnic minorities, sometimes it is not published and sometimes it is available, but only following a specific request to the right person in the right organisation/department and sometimes payment is required.

This lack of availability of data makes it difficult to project or monitor the impact of policies on BAME women. The difficulty in accessing data is a particular problem if the Government expects that "challenge from the public will be the key means of holding public bodies to account for their performance on equality".[2] Small, underfunded BAME women's organisations are already likely to face a number of barriers to taking on this role – if the data needed to hold public bodies to account is not available or very time consuming to find it is unlikely that they will be able to hold public bodies to account effectively.

Below we make recommendations in relation to the actions that public bodies and other actors should do in relation to this.

11.2.2 Increasing use of technology

There is an increasing requirement to use the internet to apply for jobs, claim benefits or access legal advice services (see Labour Market, Incomes and Poverty and Legal Advice Services Chapters). This has significant impacts on those BAME women who do not have access to the technology, or the confidence or ability to use it. Women in this situation may lose out in the labour market, fail to obtain the legal advice they need, be unable to claim the benefits to which they are entitled or may be at risk of benefit sanctions if they are unable to meet Job Centre requirements to apply for particular jobs.

In addition, the loss of face to face contact may create problems for women with multiple or complex needs who may not be able to communicate effectively over the telephone.

There is a need to investigate further the ways in which the increasing use of technology may be acting as a barrier to some BAME women, with significant negative impacts on their lives. Action should then be taken to address these problems.

11.2.3 Impact of cuts on public attitudes

Many women commented that alongside the financial impact of the cuts they also felt a hardening of public attitudes towards

people on benefits and increased instances of discrimination and racism (see the Introduction, and chapters on the Labour Market, Health and Social Services). Some felt that the atmosphere of scarce resources was leading to people looking for scapegoats for the pressure they felt under. There was a widespread feeling that this was made worse by the rhetoric used by some politicians.

It feels like there is a deliberate plan to discredit certain people, especially those of us who receive benefits, that systematically attacks us so that we are now living in an environment where there is no outcry from the public.[3]

In individual chapters of this report we have made recommendations for further investigation of this problem. At the same time there is a need for more overarching investigation of how the public spending cuts, combined with increased financial hardship for many people, are affecting public attitudes to BAME people in this country.

11.3 Combined Impact

Each chapter of this report examines the impact of spending cuts in one area. However, very many BAME women in Coventry will experience a number of different cuts at the same time. In order to fully assess the impact of all spending cuts on BAME women it is necessary to consider this combined impact.

Below we identify three different groups of BAME women in order to demonstrate the way in which the public spending cuts combine to impact upon their lives.

11.3.1 BAME Mothers

BAME women who are mothers will be affected by cuts to tax credits and the freeze to child benefit. BAME women with children are disproportionately likely to be affected by the benefits cap, the reduction of local housing allowance to the lowest 30% of rents, the decision to up-rate Local Housing Allowance by the Consumer Prices Index rather than actual rents and the four bedroom cap for local housing allowance. The benefits cap will particularly affect mothers of large families. Mothers of adult children are likely to be disproportionately affected by the increase in non-dependent deductions for housing benefit.

BAME women in this situation may face a difficult choice between moving or staying where they are. Moving means that they lose support and familial networks and their children have to move school, or face a long journey to school each day. Staying means paying additional costs from already limited budgets. There are also particular concerns for BAME families in Coventry about increased overcrowding and the impact this may have on women's health.

Cuts to welfare benefits and public sector pay freezes will particularly impact on the disproportionate number of BAME women who are already living in poverty. A higher proportion of these women's budgets is spent on food and fuel, which have risen in price in the last few years. Any increased pressure on family budgets will have a disproportionate impact on women because they often act as the 'shock absorbers' of poverty, cutting back on their own consumption (including of food) in order to balance family budgets.

The plan to pay Universal Credit as a single monthly payment to one person in a household, particularly when combined with overall benefit cuts, will make it difficult to budget and may reduce women's financial autonomy. There are particular issues for BAME women in relation to Universal Credit because of cultural issues, language barriers and lack of knowledge of how the welfare, benefit and tax systems work which can leave women more vulnerable to financial abuse.

Mothers of younger children will be affected by cuts which may reduce the level of out of school care available, making it harder for them to stay in paid work, or reduce the level of specialist support for their children, meaning they have to spend additional time struggling to get their children the support they need.

Mothers of young people aged 16 to 18, who no longer qualify for EMA, may struggle to meet the costs involved in post 16 education, such as travel to college.

Mothers of children with health or care needs will be affected by cuts to health and social care services. Delays in appointments and last minute cancellations may mean additional time off work, additional transport costs and additional childcare costs for other children. They may have to provide additional unpaid care if services are reduced, meaning they have less time for paid work, other domestic responsibilities or leisure activities.

Cuts to translation and interpretation services may mean that women have difficulty accessing maternity services, which is a key time for identifying cases of domestic violence. Some women also identified how their children were missing out on education because of having to interpret at medical appointments.

Lone mothers will experience all the problems detailed above, made worse by an increased

chance of poverty. In addition they will face the obligation to start work when their youngest child is five. They will be hit harder by cuts to childcare provision and an increase in costs since they will have to meet these costs out of one salary and do not have a partner with whom they can share childcare.

11.3.2 Disabled BAME women

Disabled BAME women may be affected by the introduction of Personal Independence Payment and Employment support allowance. There have been serious concerns raised about the quality of assessments for both these benefits. People who are denied ESA or PIP may see a significant drop in their income. Women who are denied PIP may be unable to work because they cannot meet additional transport costs.

Disabled BAME women may also be affected by the 'bedroom tax' if they need an additional bedroom for medical equipment or because they are unable to share with a partner.

These cuts to income may be particularly hard for Disabled BAME women to meet because they may face additional costs including dietary needs, the need to heat homes all day and additional transport costs. They may also need to pay for social care support if they are not eligible for free support or if the support is not sufficient.

Disabled BAME women are more likely to use health services and will therefore be affected by the increased waiting times, increased cancellation of appointments and reduction in healthcare staff. Last minute cancellation of appointments can cause practical and financial problems for disabled women who may have had to organise transport and pay parking or taxi charges.

It will be harder for disabled BAME women to challenge welfare benefit decisions or cuts to social care packages, or gain legal advice for debt or housing cases because of cuts to legal aid. These impacts may be exacerbated by the loss of support networks and advice services which provide help for disabled BAME women, in particular those who have limited English or lack confidence to speak English. Mainstream services may not provide the language support or cultural sensitivity to meet the needs of BAME women. The loss of voluntary support groups will mean BAME disabled women are less able to access informal mutual support leading to further isolation.

11.3.3 BAME Women who Experience Language Barriers

All of the cuts and changes detailed in this report will be exacerbated for women with limited literacy or spoken English.

NHS patients or their carers will not only have to deal with increased waiting times, cancellation of appointments and shortages of staff, they will also face cuts to interpretation and translation services. This may lead to an increase in expectations and the burden on family members to translate accurately, reducing privacy and the ability of women in violent relationships to disclose what is happening to them to health professionals. In addition, there may be an impact on the education or employment of family members who have to act as interpreters.

Women who face language barriers and who need to claim benefits will find the requirement to apply online difficult to fulfil. They will be at greater risk of sanction of benefits if they do not understand what is required of them or cannot meet the requirements of the Job Centre. There have been repeated allegations by whistle-blowers of targets to sanction benefit claimants, with people who face language barriers being identified as one of the groups most vulnerable to this form of targeting.

The loss of legal aid will be particularly problematic for women in this situation who will have an increased need for specialist advice and are unlikely to be able to represent themselves. The imposition of the telephone gateway to access some legal advice services also makes it harder for women who face language barriers.

The loss of specialist support services will have a particular impact on women who face language barriers who may be unable to access generic services, or find those services culturally inappropriate to meet their needs. In addition, mainstream voluntary organisations which lose funding may no longer be able to support translation and interpretation services.

A lack of confidence or ability to conduct or negotiate in English with authority figures is often accompanied by a lack of understanding of the ways systems work in the UK. This disadvantages some BAME women and, combined with high poverty levels, low literacy, and low cultural and social capital, makes it harder to access services, find work or claim benefits.

11.4 Actions required

Throughout this report we have set out what actions are required to monitor the equality and human rights impacts of these cuts.

Recommendations about specific cuts that should or should not be made or specific policies that should or should not be undertaken are outside the scope of this report.

We recognise that there are often multiple different authorities that could take action (local government, national government, police, clinical commissioning groups etc). In addition, there are often multiple courses of action that could be taken to deal with human rights and equalities issues identified above.

In this chapter, we primarily focus on highlighting the obligations on public authorities to address these issues and describing the key mechanisms through which public authorities can be held to account for their actions. We also identify the actions which other actors should also be taking.

11.4.1 Actions of Public Authorities

Policy Making

Public authorities are under a legal obligation to promote equality and not to violate human rights.

- Equality Duty - Under the Equality Act 2010 public authorities must have due regard to the need to eliminate discrimination, and advance equality (including between women and men, and between different racial groups) in all areas of their work. This includes developing policies and delivering services.
- Human Rights Obligations – Under the Human Rights Act 1998 it is unlawful for a public authority to act in a way that violates the rights of individuals that are protected by the European Convention on Human Rights. The United Kingdom has also signed up to a number of other international human rights obligations including the Convention on the Elimination of Discrimination Against Women and the International Convention on the Elimination of All Forms of Racial Discrimination.

Therefore, all public authorities that are involved in budget cutting measures should be making sure they respect their human rights and equality obligations in taking these decisions.

This report has also highlighted the importance of thinking about equality and human rights impacts cumulatively. In particular, this report has identified:

- A number of areas where cuts may lead to increased inequality between BAME women and other groups.
- How cuts and changes may combine to affect the human rights of BAME women.

Public authorities should make sure that they create coherent and collective strategies for dealing with such issues. This will include:

- Ensuring that they co-ordinate their policies and practices where multiple agencies have an impact on a particular issue (e.g. in relation to health issues, national government, clinical commissioning groups, police, the City Council, voluntary services etc.)
- Ensuring that policies and practices are not seen in isolation from another in any individual agency. For instance, the Coventry Partnership (including the City Council) have started to do some of this work looking at the combined impact of benefit cuts and considering how these relate to cuts in services at a local level (see below).

Our report only gives a snapshot of the picture in one particular city. In order to consider the impact of the cuts on BAME women more broadly the Government nationally should monitor and analyse not only information about the impact of benefit cuts nationally, but also information from a range of public authorities across the country about cuts to jobs and services locally and the likely combined impact of all cuts.

Funding for specialist BAME women's organisations and other voluntary organisations providing services to BAME women

Public authorities should recognise the importance of specialist services in meeting the specific needs of BAME women. In particular, they should make any decisions about funding for these organisations in light of the current threats to equality and BAME women's human rights in many of the areas where these organisations work.

Collection of data

Coventry Partnership, which includes Coventry City Council, has started to look at the combined impact of cuts to welfare benefits alongside cuts to local services in order to identify groups that might be particularly badly affected. This move is to be welcomed and should be used as a model for other public authorities.

Monitoring of Impacts

In each of the individual chapters of this report recommendations were made about the further monitoring of the equality and human rights impacts of the public sector spending cuts that is required.

The primary responsibility for undertaking this monitoring should fall on public authorities. A lot of monitoring is already done by public authorities (some of this is required by law, some of it is not).

The *Specific Duties* under the Equality Act has led to suggestions that the obligations that previous equality legislation placed on public authorities to assess and monitor policies for their equality impact have been weakened.[4] In the words of the Equality and Diversity Forum this may give "public bodies the inaccurate

impression that they do not have to do much in order to comply with the statutory equality duty."[5]

However, it is difficult to see how public bodies can meet their obligations under the general duty of the Equality Act without undertaking some monitoring of impacts. The Government's consultation paper on the specific duties states:

> *Under the requirements of the general duty to have "due regard" to the matters set out in the Act, public bodies will need to understand the effect of their policies and practices on equality – this will involve looking at evidence, engaging with people, staff, service users and others and considering the effect of what they do on the whole community.*[6]

These processes are the main elements of a good Equality Impact Assessment, suggesting that EIAs should remain an important tool for public authorities to ensure they are meeting their legal obligations under the Equality Act.

The approach of the Courts to assessing equality duties of public authorities also supports this. A series of cases in relation to the equalities duties under previous equalities legislation made it clear that, whatever their specific duties, public bodies' general duties to pay 'due regard' to promoting equality between different groups entails undertaking a process that looks very much like a good impact assessment process when they undertake budget-cutting measures – including consultation, evidence-gathering and analysis of impacts.[7] Similar principles have now been confirmed with regard to the new s.149 duty under the Equalities Act.[8]

The Centre for Human Rights in Practice has reviewed a great deal of EIA practice across the UK as part of a wider project on Impact Assessments. We have generally found it to be of very poor quality. Public authorities generally need to improve this practice or find other ways of monitoring impacts if they are to be seen as taking their responsibilities seriously.

11.4.2 Actions by Other Actors

All actors who are concerned about the human rights and equality impacts of the spending cuts on BAME women need to continue to take action to reduce and eliminate negative impacts. Actions include:

- Monitoring - Central Government is currently moving to a different model of equality monitoring where "challenge from the public will be the key means of holding public bodies to account for their performance on equality."[9] Voluntary organisations, academic institutions, trade unions and other bodies have an important role to play in collecting, analysing and monitoring the impact of policies on the people in their communities. This is particularly true when so many Equality Impact Assessments currently undertaken by some public bodies are so weak.
- Campaigning and advocacy – Voluntary and community groups, unions and others can use the evidence of impact they gather through their work and research projects such as this to increase public pressure for action to be taken to combat human rights and equality issues.
- Legal Action - Where violations of equality duties and human rights obligations are identified, then cases can be brought to the Courts in order to enforce obligations. There have already been successful challenges through the Courts to the public sector spending cuts.

11.5 Next steps for this project

This is the third of a series of reports that examines the impact of the public spending cuts on different groups of women in Coventry. Funding is actively being sought to continue work in this area.

1 Interview with Author, May 2013
2 Home Office (2010) "Equality Act 2010: The public sector Equality Duty: reducing bureaucracy." p.4 Available online at http://www.homeoffice.gov.uk/publications/equalities/equality-act-publications/policy-review?view=Standard&pubID=904215 (accessed on 16 June 2013)
3 Interview with Author, June 2013
4 Equality Act 2010 (Specific Duties) Regulations 2011
5 Equality and Diversity Forum (2011) "Submission in response to the Public Sector Equality Duty" Available online at www.edf.org.uk.
6 Home Office (2010) "Equality Act 2010: The public sector Equality Duty: reducing bureaucracy." p.4 Available online at http://www.homeoffice.gov.uk/publications/equalities/equality-act-publications/policy-review?view=Standard&pubID=904215 (accessed on 16 June 2013)
7 See e.g., R (on the application of W) v Birmingham City Council [2011] EWHC 1147 (Admin); R v London Councils (ex parte Hajrula and Hamza) [2011] EWHC 151; R v Birmingham City Council (ex parte Rotao Rahman) [2011] EWHC 944 (Admin).
8 E.g. R (on the application of Kirsty Green) v Gloucestershire County Council [2011] EWHC 2687 (Admin). See in particular paras 118-131.
9 Home Office (2010) "Equality Act 2010: The public sector Equality Duty: reducing bureaucracy." p.4 Available online at http://www.homeoffice.gov.uk/publications/equalities/equality-act-publications/policy-review?view=Standard&pubID=904215 (accessed on 16 June 2013)

Appendix 1: Methodology

What is a human rights and equality impact assessment (HREIA) and why we interested in undertaking one?

A Human Rights and Equality Impact Assessment is a process for ensuring that the human rights and equality implications of a policy are taken into account in the development and/or revision of that policy.

It is based on legal principles. In our case, because the HREIA is taking place in the UK, the primary legal principles are the equality duties set out in the Equality Act 2010 and the human rights obligations protected by the Human Rights Act 1998 as well as the UK's other international human rights obligations.[1] This assessment seeks to identify what will be the impact of the public spending cuts on these legally protected equality and human rights obligations.

The HREIA that we are describing here assesses the potential impacts of the budget public spending cuts on BAME women in Coventry. It involves eight core elements or steps which are explained in more detail below.

The Specific Duties on public authorities under the Equality Act in England do not specify the same level of monitoring and assessment required under earlier equality legislation. However we believe it will be difficult for public bodies to meet their general duty to eliminate discrimination and promote equality if they do not monitor potential and actual equality impact and consult with affected groups (see Chapter 11 above). Public authorities also need to ensure that they do not violate human rights. Equality and Human Rights Impact Assessments are a potentially important tool in this endeavour.

However CHRP had become increasingly aware of poor quality human rights and equality analysis that have been produced by public authorities in relation to various budget cutting processes. Such assessments tend to be inadequate for a number of reasons, including that they:

- Are often poorly resourced and clearly lack sufficient analysis
- Can appear to be a justification for a decision that has already been made rather than an assessment of the full impact of that decision.
- Frequently ignore earlier assessments or other relevant data that don't suit the needs of the current analysis
- Can take a narrow or misguided view about the key human rights and equality principles behind the assessment[2]

We therefore wanted to undertake a robust and meaningful assessment that would explore what the potential human rights and equality impacts of the cuts would be and whether they would exacerbate the patterns of inequality already existing in Coventry. This EHRIA is the third in the series.

Eight Key Elements in the HRIA Process

The HREIA process we adopted included eight key elements. CHRP has already developed these eight elements in previous work on HREIA methodologies.[3] Here, we explain what each of these elements entailed to give readers an insight into what the HRIA process involved:

1. **Screening** - It was at this stage that we decided which aspects of the impacts of the cuts on women we would focus upon the following priority areas. Each of these areas makes up a chapter of the report:
   - The Labour Market
   - Housing
   - Incomes and Poverty
   - Education
   - Violence Against Women
   - Health
   - Social Care
   - Legal Advice Services
   - Women's Voluntary Organisations
2. **Scoping** – For each of the above areas, we then asked the following key questions to inform our assessment before taking any further action:
   - Who did we need to consult with in Coventry?
   - What other evidence did we require in order to inform our analysis of the issue?
   - What were the human rights and equality issues that potentially arose from public spending cuts in each of these areas? – Our whole study was therefore framed by an equality and human rights perspective:
     - The equality perspective meant that we were specifically focusing on ways in which the public sector spending cuts might disproportionately affect BAME women
     - The human rights perspective meant that we were specifically focusing on ways in which the public sector spending cuts might have the most severe impacts on BAME women.
3. **Consultation** – We conducted semi-structured interviews and focus groups with organisations and individuals in Coventry as well as relevant national organisations. This was undertaken in order to
   - Better understand what the impacts of the public spending cuts were in Coventry at the local level
   - Ensure that the voices of those likely to be affected by the policy were heard and taken into account in the HRIA process.

The women interviewed during the course of this HREIA came from a range of ethnic backgrounds including: African, African Caribbean, Arab, Bangladeshi, Chinese, Eastern European, Indian, Pakistani and Roma women. In total over 180 women were interviewed. This can be broken down into:

- 28 face to face and telephone interviews conducted with representatives of local organisations in Coventry who provide front line services to BAME women and national organisations who have a national perspective on issues relating to BAME women and the cuts.
- 150 women who attended 11 focus groups which we held. Where appropriate we provided interpretative services to reach those women who may not have had a voice otherwise.
- A further 6 interviews were held with individual women not part of focus groups but approached the researchers themselves to be involved.

The groups with whom we consulted included:
Cariba Project, Coventry Carers Centre, Coventry Citizens Advice Bureau, Coventry City Council; Coventry Ethnic Minority Action Partnership; Coventry Haven, Coventry Law Centre; Coventry Rape and Sexual Abuse Centre, Coventry Womens Development Organisation, Voluntary Action Coventry, Ekta Unity Group, Health Inequalities Team, Foleshill Women's Training, Grapevine, Helen Women's Project, Imkaan, National

Union of Teachers, Orbit Housing, Panahghar, PCS the Union, Rights of Women, Roma Group, Sahil Project, Nuneaton Sexual Assault Referral Centre, Southall Black Sisters, Tamarind Centre, Thaliwal Bridge Immigration Solicitors and Mental Health Services, Unison, Unite the Union, University of Warwick, Valley House, West Midlands Deputy Police and Crime Commissioner; Workers Educational Association

4. **Evidence gathering** – We collected information from a variety of different sources to inform analysis of the policy. The consultations we conducted with local groups provided vital information. This was supplemented by other information which included:
   - National level analysis of the impact of the public spending cuts on BAME women.
   - Coventry specific data on the numbers of women or particular groups of BAME women (for example carers) who would be impacted by the cuts (from relevant Government departments, the Office of National Statistics, Coventry City Council and so on.)
   - Where we could not find Coventry-specific data we used national level data to give an indication of the scale of the issue.

5. **Analysis** – We then analysed the policy area in question utilising principles and standards from relevant human rights and equality legislation including:
   - The human rights contained in the European Convention on Human Rights and protected in the UK by the Human Rights Act
   - The equality duties set out in the Equality Act 2010.

6. **Conclusions and Recommendations** – Based on the preceding analysis, we then identified what the main human rights and equalities impacts were for each area of the study and made recommendations for what action was required.

   The recommendations that are made are limited to highlighting the obligations on public authorities and the further monitoring of the cuts that is required. Recommendations do not specify cuts that should or should not be made or specific policies that should or should not be undertaken. This is because it is recognised that:
   - There are often multiple different authorities that could take action (local government, national government, primary care trusts etc.)
   - There are often multiple courses of action that could be taken to deal with human rights and equalities issues identified.
   - Some of the policies analysed are only proposals and are not yet in force.

   It should be noted that a public authority carrying out an HREIA would have an obligation to create much more definite and precise conclusions and recommendations in relation to the actions that they (and other authorities) were going to take to deal with impacts identified.

7. **Publication** – This report represents the publication of the results of the process we have undertaken. A chapter is devoted to each area of assessment which sets out:
   - Description of the public sector spending cut for the issue under discussion (for example health, social care etc.).
   - Information about the national impact
   - Information about how this cut will affect BAME women in Coventry.
   - An analysis of what the human rights and equalities issues of the cuts will be.
   - What monitoring should take place in order to assess the on-going impacts of the cuts.

8. **Monitoring** – The report also includes recommendations for the further monitoring that is required in order to assess what the actual impact of the cuts will be on BAME women in Coventry over the next few years.

1 The Equality Act 2010, along with news and guidance about the Act can be found online at http://www.equalities.gov.uk/equality_act_2010.aspx. The Human Rights Act and guidance on the Act can be found online at http://www.equalityhumanrights.com/human-rights/what-are-human-rights/the-human-rights-act/. The UK has signed up to a number of other international human rights treaties. The main treaties are listed on the Equality and Human Rights Commission's website at http://www.equalityhumanrights.com/human-rights/international-framework/

2 See Harrison and Stephenson, 'Assessing the Impact of the Public Spending Cuts: Taking Human Rights and Equality Seriously' in Aoife Nolan, Rory O'Connell and Colin Harvey, (eds.) Human Rights and Public Finance Budgets and the Protection of Economic and Social Rights, Hart Publishing, (2013) ; Working Paper available at SSRN: http://ssrn.com/abstract=1868903

3 See Harrison, J. (2011) "Human Rights Measurement: Reflections on the Current Practice and Future Potential of Human Rights Impact Assessment." Journal for Human Rights Practice Vol.3 (2), pp. 162 – 187. See also, a summary of CHRP's work on impact assessments online at http://www2.warwick.ac.uk/fac/soc/law/chrp/projectss/humanrightsimpactassessments/.

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