

TEMPLATE 2 - Full Equality Impact Assessment (EqIA)

In order to carry out this assessment, it is important that you have completed the EqIA E-learning Module and read the Corporate Guidelines on EqIAs. Please refer to these to assist you in completing this form and assessment.

What are the proposals being assessed? (Note: 'proposal' includes a new policy, policy review, service review, function, strategy, project, procedure, restructure)	SNT3 Programme: (1) refreshed policy (2) introduction of new services (3) shifting towards being a commissioned service through externalisation
Which Directorate / Service has responsibility for this?	Children's & Families Services
Name and job title of lead officer	Roger Rickman
Name & contact details of the other persons involved in the EqIA:	Ben Sellar-Moore (8218: ben.sellar-moore@harrow.gov.uk)
Date of assessment:	25 th February 2013

Stage 1: Overview

<p>1. What are the aims, objectives, and desired outcomes of your proposals?</p> <p>(Explain proposals e.g. reduction / removal of service, deletion of posts, changing criteria etc)</p>	<p><i>Aims are: more independent travelling & use of personal budgets, clarity in new policy, more robust management of Fraikin, delivery of the LEAN project & new processes, reduced work-force absence, greater percentage of transport delivered by external providers</i></p>
<p>2. What factors / forces could prevent you from achieving these aims, objectives and outcomes?</p>	<p>The strategic risks are as follows:</p> <ul style="list-style-type: none"> 5. Back-dated claim from Fraikin not received 10. LEAN#1 Low number of LEAN opportunities identified 11. LEAN#2 Client Model not established 12. Absence project doesn't launch due to lack of scope 13. Fraikin buy-out more expensive than modelled 14. Contracts more costly than expected due to a high % of TUPE transfers 15. Contractors unable to maintain quality in delivery

<p>3. Who are the customers? Who will be affected by this proposal? For example who are the external/internal customers, communities, partners, stakeholders, the workforce etc.</p>	<p>Customers: Children receiving transport Affected stakeholders: Staff, suppliers, parents & carers, schools, transport planning team, SENARS team</p>
<p>4. Is the responsibility shared with another department, authority or organisation? If so:</p> <ul style="list-style-type: none"> • Who are the partners? • Who has the overall responsibility? 	<p>- Currently 20% outsourced, client & operational delivery by one team (Transport Planning Team) - Project will move to 100% commissioned over 3 years</p>
<p>4a. How are/will they be involved in this assessment?</p>	<p>- Staff will be consulted within the delivery phase. The Transport Team have chosen the ordering of the routes to be offered to the market, will be involved in the LEAN review & will become the client team</p>
<p>Stage 2: Monitoring / Collecting Evidence / Data</p>	
<p>5. What information is available to assess the impact of your proposals? Include the actual data, statistics and evidence (including full references) reviewed to determine the potential impact on each equality group (protected characteristic). This can include results from consultations and the involvement tracker, customer satisfaction surveys, focus groups, research interviews, staff surveys, workforce profiles, service users profiles, local and national research, evaluations etc</p> <p>(Where possible include data on the nine protected characteristics. Where you have gaps, you may need to include this as an action to address in the action plan)</p>	
<p>Age (including carers of young/older people)</p>	<p>500 service user customers aged 5 – 25 Staff age profile 3% 70+, 43% 60+, 35% 50+, 11% 40+, 8% <39.</p>
<p>Disability (including carers of disabled people)</p>	<p>All customers have a physical or learning difficulty, ages range from 5 to 25. 6 staff are known to have disabilities</p>

Gender Reassignment	<i>No known impact</i>			
Marriage / Civil Partnership	<i>No known impact</i>			
Pregnancy and Maternity	<i>No known impact</i>			
Race	<i>No known impact</i>			
Religion and Belief	<i>No known impact</i>			
Sex / Gender	<i>More male customers than Female</i> <i>Most drivers are Male, most escorts are Female</i>			
Sexual Orientation	<i>No known impact</i>			
6. Is there any other (local, regional, national research, reports, media) data sources that can inform this assessment? <i>Include this data (facts, figures, evidence, key findings) in this section.</i>	<i>There is likely to be a growth in SEN children & young adults according to demographic projections.</i>			
7. Have you undertaken any consultation on your proposals? (this may include consultation with staff, members, unions, community / voluntary groups, stakeholders, residents and service users)	Yes	Yes	No	
<p>NOTE: If you have not undertaken any consultation as yet, you should consider whether you need to. For example, if you have insufficient data/information for any of the protected characteristics and you are unable to assess the potential impact, you may want to consult with them on your proposals as how they will affect them. Any proposed consultation needs to be completed before progressing with the rest of the EqIA.</p> <p>Guidance on consultation/community involvement toolkit can be accessed via the link below http://harrowhub/info/200195/consultation/169/community_involvement_toolkit</p>				

(1)Who was consulted?	What consultation methods were used?	What do the results show about the impact on different equality groups (protected characteristics)?	What action are you going to take as a result of the consultation? This may include revising your proposals, steps to mitigate any adverse impact. <i>(Also Include these in the Improvement Action Plan at Stage 5)</i>
(1) Head Teachers of special schools	<i>Face to face meetings</i>	<i>No impact on particular groups other than disabled customers from policy consultation</i>	<p>(1) <i>ensure that suppliers meet quality objectives</i></p> <p>(2) <i>ensure parents agree any new independent travel arrangements</i></p> <p>(3) <u><i>consult with target audience in policy refresh & new services through school involvement</i></u></p>
(2) Team Manager: Transport Team	<i>Face to face meetings</i>	<i>Certain customers would prefer continuity in drivers & escorts, Team input is essential in specifying contracts, roles & work tasks. Involve Trade Unions in staff consultation phase.</i>	<p>(1) <i>ensure that suppliers meet contractual quality objectives</i></p> <p>(2) <i>ensure the transport team lead the appropriate work-streams (LEAN, Absence, Market Engagement, ITT, DTP)</i></p> <p>(3) <i>Involve Unions in staff consultation</i></p>
(3) Team Manager: SENARS	<i>Face to face meetings</i>	<i>Some SEN parents & carers receive a direct payment, other may like the option. Clients of Special Transport prefer consistency in transport provision.</i>	<p>(1) <i>continue to develop a DTP option</i></p> <p>(2) <i>request that suppliers seek consistency in provision</i></p>

<p>(4) Parents & Carers: Shaftesbury School</p>	<p><i>Parents evening presentation</i></p>	<p><i>Children would prefer to be trained by people they know, parents will have to have the ability to stop training or not go ahead with independent travel after training</i></p>	<p>(1) <i>continue to develop ITT offer</i> (2) <i>make sure parents are in control of training and travel arrangements</i></p>
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Stage 3: Assessing Impact and Analysis

8. What does your information tell you about the impact on different groups? Consider whether the evidence shows potential for differential impact, if so state whether this is an adverse or positive impact? How likely is this to happen? How you will mitigate/remove any adverse impact?

Protected Characteristic	Positive	Adverse	Explain what this impact is, how likely it is to happen and the extent of impact if it was to occur.	What measures can you take to eliminate or reduce the adverse impact(s)? E.g. consultation, research, implement equality monitoring etc (Also Include these in the Improvement Action Plan at Stage 5)
Age (including carers of young/older people)	Yes	Yes	<ul style="list-style-type: none"> - Positive/Negative: 45% of staff are 60 or over - Definite change & potential redundancy could be either positive or negative depending on personal circumstances 	<ul style="list-style-type: none"> - Project phased over 3 years, giving staff the opportunity to consider impact and options - Transfer through TUPE rights
Disability (including carers of disabled people)	Yes	Small	<ul style="list-style-type: none"> - Greater number of independent travellers - Changed transport provider & staff 	<ul style="list-style-type: none"> - safety training before commencement - seek staff continuity in provider contracts - give notice of change to transport users
Gender Reassignment	No	No		
Marriage and Civil Partnership	No	No		
Pregnancy and Maternity	No	No		
Race	No	No		
Religion or Belief	No	No		
Sex	No	No	<ul style="list-style-type: none"> - Definite change & potential redundancy could be either positive or negative depending on personal circumstances 	<ul style="list-style-type: none"> - Project phased over 3 years, giving staff the opportunity to consider impact and options - Transfer through TUPE rights
Sexual Orientation	No	No		

Other (please state)	No	No		
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<p>9. Cumulative impact – Are you aware of any cumulative impact? For example, when conducting a major review of services. This would mean ensuring that you have sufficient relevant information to understand the cumulative effect of all of the decisions.</p> <p>Example: A local authority is making changes to four different policies. These are funding and delivering social care, day care, and respite for carers and community transport. Small changes in each of these policies may disadvantage disabled people, but the cumulative effect of changes to these areas could have a significant effect on disabled people’s participation in public life. The actual and potential effect on equality of all these proposals, and appropriate mitigating measures, will need to be considered to ensure that inequalities between different equality groups, particularly in this instance for disabled people, have been identified and do not continue or widen. This may include making a decision to spread the effects of the policy elsewhere to lessen the concentration in any one area.</p>	
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10. How do your proposals contribute towards the requirements of the Public Sector Equality Duty (PSED), which requires the Council to have due regard to eliminate discrimination, harassment and victimisation, advance equality of opportunity and foster good relations between different groups.

(Include all the positive actions of your proposals, for example literature will be available in large print, Braille and community languages, flexible working hours for parents/carers, IT equipment will be DDA compliant etc)

Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010	Advance equality of opportunity between people from different groups	Foster good relations between people from different groups	Are there any actions you can take to meet the PSED requirements? <i>(List these here and include them in the Improvement Action Plan at Stage 5)</i>
<i>All client needs continue to be met, staff are given options for the their future employment</i>	<i>All staff supported in change management processes</i>	<i>Client, parent & carer needs met by proposals</i>	<i>Providing support to staff, providing new services for clients, meeting the needs of clients</i>

11. Is there any evidence or concern that your proposals may result in a protected group being disadvantaged (please refer to the Corporate Guidelines for guidance on the definitions of discrimination, harassment and victimisation and other prohibited conduct under the Equality Act)?

	Age (including carers)	Disability (including carers)	Gender Reassignment	Marriage and Civil Partnership	Pregnancy and Maternity	Race	Religion and Belief	Sex	Sexual Orientation
Yes	<i>Potential</i>								
No		<i>Positive</i>	<i>No</i>	<i>No</i>	<i>No</i>	<i>No</i>	<i>No</i>	<i>No</i>	<i>No</i>

If you have answered "yes" to any of the above, set out what justification there may be for this in Q12a below - link this to the aims of the proposal and whether the disadvantage is proportionate to the need to meet these aims. (You are encouraged to seek legal advice, if you are concerned that the proposal may breach the equality legislation or you are unsure whether there is objective justification for the proposal)

If the analysis shows the potential for serious adverse impact or disadvantage (or potential discrimination) but you have identified a potential justification for this, this information must be presented to the decision maker for a final decision to be made on whether the disadvantage is proportionate to achieve the aims of the proposal.

If there are adverse effects that are not justified and cannot be mitigated, you should not proceed with the proposal. (select outcome 4)

If the analysis shows unlawful conduct under the equalities legislation, you should not proceed with the proposal. (select outcome 4)

Stage 4: Decision

12. Please indicate which of the following statements best describes the outcome of your EqIA (tick one box only)

Outcome 1 – No change required: when the EqIA has not identified any potential for unlawful conduct or adverse impact and all opportunities to enhance equality are being addressed.	
Outcome 2 – Minor adjustments to remove / mitigate adverse impact or enhance equality have been identified by the EqIA. <i>List the actions you propose to take to address this in the Improvement Action Plan at Stage 5</i>	Yes
Outcome 3 – Continue with proposals despite having identified potential for adverse impact or missed opportunities to enhance equality. In this case, the justification needs to be included in the EqIA and should be in line with the PSED to have ‘due regard’. In some cases, compelling reasons will be needed. You should also consider whether there are sufficient plans to reduce the adverse impact and/or plans to monitor the impact. (explain this in 12a below)	
Outcome 4 – Stop and rethink: when there is potential for serious adverse impact or disadvantage to one or more protected groups. (You are encouraged to seek Legal Advice about the potential for unlawful conduct under equalities legislation)	

<p>12a. If your EqIA is assessed as outcome 3 or have ticked ‘yes’ in Q11, explain your justification with full reasoning to continue with your proposals.</p>	<p>There will be impacts on the work force from the proposals. Staff may transfer to new suppliers under TUPE. Some staff may be made redundant, where redundancy is likely, staff will be considered for redeployment. The Protocol for Managing Organisational Change will be adhered to throughout the programme.</p>
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Stage 5: Making Adjustments (Improvement Action Plan)

13. List below any actions you plan to take as a result of this impact assessment. This should include any actions identified throughout the EqIA.

Area of potential adverse/ positive impact	Action proposed	Desired Outcome	Target Date	Lead Officer	Progress
Age (adverse)	- Providing support to staff	Making staff aware of options & able to select the right option for them	April to June 2013	BSM	Design of staff consultation process
Disability (positive)	- Offering new ITT service - Offering new DTP service - Seeking consistency in delivery from external providers	Achieving required savings whilst giving more choice, more independence & delivering assurance of supply for client group	ITT: June DTP: June Contracts: Nov	BSM	Programme design starts at first principles of customers needs & desired outcome

Stage 6 - Monitoring

The full impact of the decision may only be known after the proposals have been implemented, it is therefore important to ensure effective monitoring measures are in place to assess the impact.

14. How will you monitor the impact of the proposals once they have been implemented? How often will you do this? (Also Include in Improvement Action Plan at Stage 5)	- Performance monitoring the ITT & transport contracts - Profiling staff impact			
15. Do you currently monitor this function / service? Do you know who your service users are?	Yes	Yes	No	

<p>16. What monitoring measures need to be introduced to ensure effective monitoring of your proposals? <i>(Also Include in Improvement Action Plan at Stage 5)</i></p>	<ul style="list-style-type: none"> - <i>Profiling staff impact</i> - <i>Contract management processes</i> - <i>Monitor client profile</i>
<p>17. How will the results of any monitoring be analysed, reported and publicised? <i>(Also Include in Improvement Action Plan at Stage 5)</i></p>	<ul style="list-style-type: none"> - <i>Reported to Programme Board whilst operational</i> - <i>Reporting to commissioning/client team when operational</i>
<p>18. Have you received any complaints or compliments about the policy, service, function, project or proposals being assessed? If so, provide details.</p>	<ul style="list-style-type: none"> - <i>No</i>
<p>Stage 7 – Reporting outcomes The completed EqlA must be attached to all committee reports and a summary of the key findings included in the relevant section within them. EqlA's will also be published on the Council's website and made available to members of the public on request.</p>	
<p>19. Summary of the assessment</p> <p>NOTE: This section can also be used in your reports, however you must ensure the full EqlA is available as a background paper for the decision makers (Cabinet, Overview and Scrutiny, CSB etc)</p> <p>What are the key impacts – both adverse and positive? Are there any particular groups affected more than others? Do you suggest proceeding with your proposals although an adverse impact has been identified? If yes, what are your justifications for this? What course of action are you advising as a result of this EqlA?</p>	<ul style="list-style-type: none"> - <i>Potential positive impact on client group through new services</i> - <i>Need for seeking consistency in supply from new providers</i> - <i>Potential negative effect on the workforce that has an older than average age-profile</i>
<p>20. How will the impact assessment be publicised? E.g. Council website, intranet, forums, groups etc</p>	<ul style="list-style-type: none"> - <i>Attached to Cabinet Report & published on intranet</i>
<p>Stage 8 - Organisational sign Off (to be completed by Chair of Departmental Equalities Task Group) The completed EqlA needs to be sent to the chair of your Departmental Equalities Task Group (DETG) to be signed off.</p>	

21. Which group or committee considered, reviewed and agreed the EqIA and the Improvement Action Plan?	<i>- Members of the Children's Services EQIA Quality Assurance group</i>		
Signed: (Lead officer completing EqIA)		Signed: (Chair of DETG)	Richard Segalov
Date:		Date:	4 April 2013