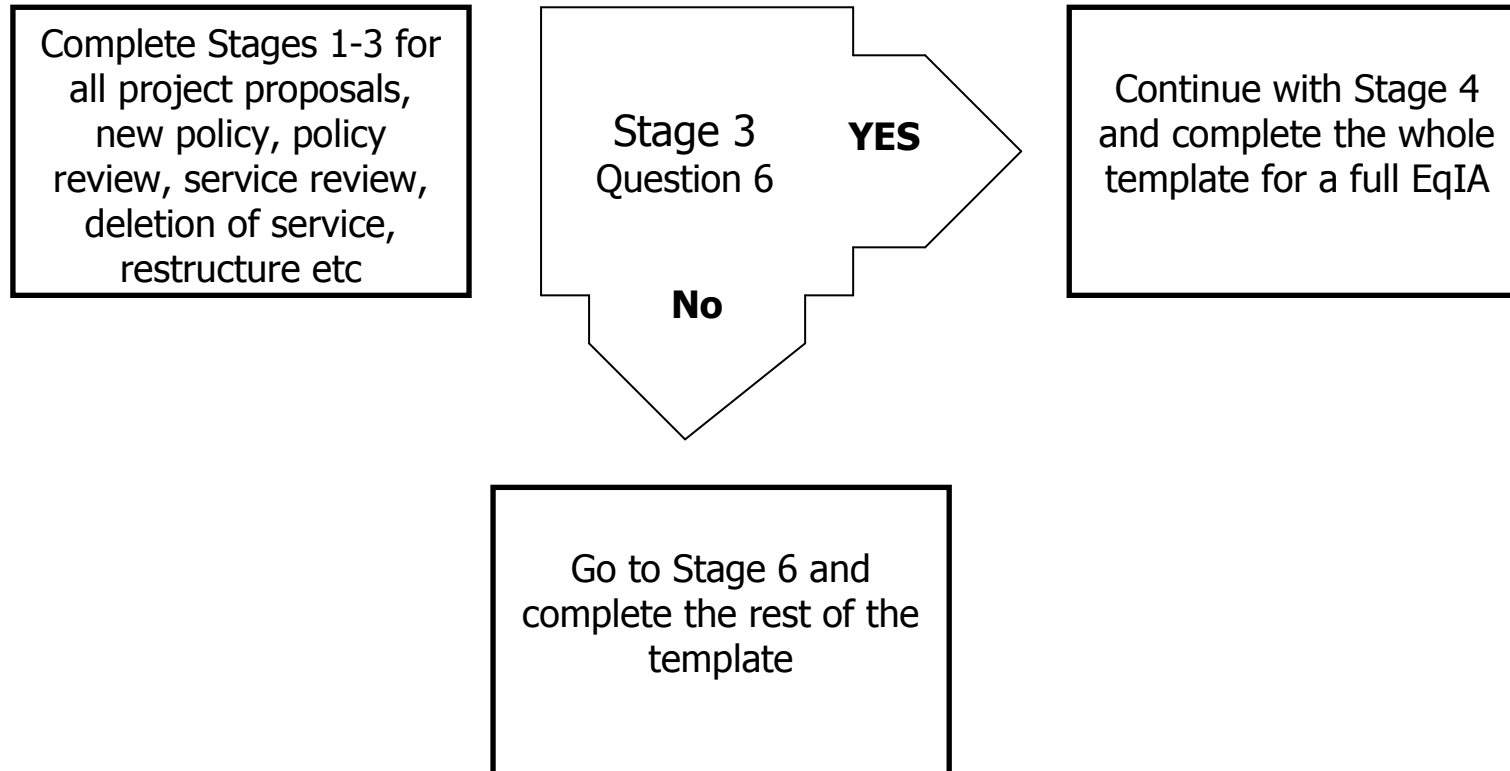


Equality Impact Assessment

The Council has revised and simplified its Equality Impact Assessment process. There is now just one Template. Project Managers will need to complete **Stages 1-3** to determine whether a full EqIA is required and the need to complete the whole template.



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 assessment.

It will also help you to look at the EqIA Template with Guidance Notes to assist you in completing the EqIA.

Type of Project / Proposal:		Tick	Type of Decision:		Tick
Transformation			Cabinet		
Capital			Portfolio Holder		
Service Plan			Corporate Strategic Board		
Other			Other		
Title of Project:		Youth Justice Plan			
Directorate / Service responsible:		Targeted Services - Children and Families			
Name and job title of lead officer:		Melissa Caslake, Divisional Director of Targeted Services			
Name & contact details of the other persons involved in the assessment:					
Date of assessment:		30.09.13			

Stage 1: Overview

<p>1. What are you trying to do?</p> <p>(Explain proposals e.g. introduction of a new service or policy, policy review, changing criteria, reduction / removal of service, restructure, deletion of posts etc)</p>	<p>A requirement of the 1998 Crime and Disorder Act (S38) is for each local authority with partner agencies (Police, Probation and Health) to set up a multi-agency Youth Offending Team (YOT) and as a requirement of the Youth Justice Grant submit an annual Youth Justice Plan (appendix 1).</p> <p>The purpose of the plan is to provide details of how youth justice services have been and are planned to be delivered in accordance with Youth Justice Board Guidelines. The plan targets are aimed at 10 – 17 year old.</p>					
<p>2. Who are the main people / Protected Characteristics that may be affected by your proposals? (all that apply)</p>	Residents / Service Users	x	Partners	x	Stakeholders	x
	Staff		Age	x	Disability	
	Gender Reassignment	x	Marriage and Civil		Pregnancy and	

			Partnership		Maternity	
	Race	x	Religion or Belief	x	Sex	x
	Sexual Orientation	x	Other			

<p>3. Is the responsibility shared with another directorate, authority or organisation? If so:</p> <ul style="list-style-type: none"> • Who are the partners? • Who has the overall responsibility? • How have they been involved in the assessment? 	<ul style="list-style-type: none"> § Public Health § Police § Probation § Education <p>All partners and voluntary organisations were involved in the development of the plan through the Youth Offending Management Board. This EqIA will be shared with those involved in the development and delivery of the plan.</p>
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Stage 2: Evidence / Data Collation

4. What evidence / data have you reviewed to assess the potential impact of your proposals? Include the actual data, statistics reviewed in the section below. This can include census data, borough profile, profile of service users, workforce profiles, results from consultations and the involvement tracker, customer satisfaction surveys, focus groups, research interviews, staff surveys; complaints etc. Where possible include data on the nine Protected Characteristics.

(Where you have gaps (data is not available/being collated), you may need to include this as an action to address in your Improvement Action Plan at Stage 7)

Age (including carers of young/older people)	<p>Analysis of local caseload data.</p> <p>A snapshot of Harrow’s caseload shows the following age breakdown at the point of sentencing;</p> <p>Under 13 (6.5%), Age 14 (13.2%), Age15 (16.5%), Age 16 (33.0%), Age 17 (30.8%)</p> <p>Following national trends, the majority off the offending population are 15 and above, with 16 and 17 year olds being the highest represented group accounting for a combined total of 63%.</p>
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Disability (including carers of disabled	The assessment process records and identifies individual special needs including the impact of learning
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people)	difficulties on offending and re-offending. The data analysis has identified the need for a more sophisticated monitoring tool where data can be extracted from YOIS in order to assist in more targeted service delivery.
Gender Reassignment	
Marriage / Civil Partnership	
Pregnancy and Maternity	
Race	<p>Youth Justice Board National Published YDS Data.</p> <p>Ethnicity data for the local offending population has been analysed against local demographic data. Offending Data for Harrow highlights a significant difference between Harrows 10-17 demographic and the offending population. White British made up 34% of the 10-17 population but 2012-13 figures show that a higher proportion of the offending population (42%) were white British. Also significantly over represented in youth offending, were those from a Black ethnic group, with 43% of youth offenders belonging to that group compared to only 13% of the local population. During 2012-13 the Asian population was significantly under represented in youth offending with only 16% compared to a population split of 41%.</p>
Religion and Belief	
Sex / Gender	<p>Gender data for the local offending population has been analysed against local demographic data and against YOT neighbours data.</p> <p>Overall, the national trend is that the youth offending population are predominately male. During 2012-13, Harrow had 17% Female compared to 83% Male. The low female proportion is reflective of the national picture. However, Harrows proportion is slightly higher than the London average of 14% and the comparative YOT's average of 15%.</p>
Sexual Orientation	
Socio Economic	
5. What other (local, regional, national research, reports,	National research has highlighted there is a higher representation of BME in the

media) data sources that you have used to inform this assessment? List the Title of reports / documents and websites here.	youth justice system in regards to offending and re-offending. This is an area that will be addressed in the YJB Plan 2013 – 14 through the Risk and Vulnerability Panel.
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Stage 3: Assessing Potential Disproportionate Impact

6. Based on the evidence you have considered so far, is there a risk that your proposals could potentially have a disproportionate adverse impact on any of the Protected Characteristics?

	Age (including carers)	Disability (including carers)	Gender Reassignment	Marriage and Civil Partnership	Pregnancy and Maternity	Race	Religion and Belief	Sex	Sexual Orientation
Yes									
No	X	X	X	X	X	X	X	X	X

YES - If there is a risk of disproportionate adverse Impact on any **ONE** of the Protected Characteristics, continue with the rest of the template.

§ **Best Practice:** You may want to consider setting up a Working Group (including colleagues, partners, stakeholders, voluntary community sector organisations, service users and Unions) to develop the rest of the EqIA

§ It will be useful to also collate further evidence (additional data, consultation with the relevant communities, stakeholder groups and service users directly affected by your proposals) to further assess the potential disproportionate impact identified and how this can be mitigated.

NO - If you have ticked 'No' to all of the above, then go to **Stage 6**

§ Although the assessment may not have identified potential disproportionate impact, you may have identified actions which can be taken to advance equality of opportunity to make your proposals more inclusive. These actions should form your Improvement Action Plan at Stage 7

Stage 4: Collating Additional data / Evidence

7. What additional data / evidence have you considered to further assess the potential disproportionate impact of your proposals? (include this evidence, including any data, statistics, titles of documents and website links here)	
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8. What consultation have you undertaken on your proposals?			
Who was consulted?	What consultation methods were used?	What do the results show about the impact on different groups / Protected Characteristics?	What actions have you taken to address the findings of the consultation? (This may include further consultation with the affected groups, revising your proposals).
Key partners (Police, Probation, Health and Education) have been consulted through the YOT Management Board.	Discussions held at the YOT Management Board have been incorporated into implementation plan.	The discussions and data analysis has shown greater scrutiny and data gathering in the areas specified above. This work is on track with the data analysis requested to review data collected and identified gaps filled in regards to data collection.	The recommendations have been incorporated into the final plan. The YOT Management Board will continue to receive bi-monthly reports and monitor and scrutinise the implementation of the plan. In addition the Risk Management Panel has representation from the Police, Education and Probation where further monitoring and tracking of individual cases will take place.

Stage 5: Assessing Impact and Analysis

9. What does your evidence 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	Adverse	Positive	Explain what this impact is, how likely it is to happen and the extent of impact if it was to occur. Note – Positive impact can also be used to demonstrate how your proposals meet the aims of the PSED Stage 9	What measures can you take to mitigate the impact or advance equality of opportunity? E.g. further consultation, research, implement equality monitoring etc (Also Include these in the Improvement Action Plan at Stage 7)
		x	The data analysis highlights the largest offending	<ul style="list-style-type: none"> The Brief Panels will work closely with the

Age (including carers of young/older people)			group is between the ages of 16 – 17 (63%)	<p>YOT Manager in monitoring this cohort together with ensuring interventions are effective and aimed at reducing re-offending.</p> <ul style="list-style-type: none"> • Joint home visits will take place by the case manager and the YOT Police Officer to each young person at risk of re-offending and likely to be breached and returned to court. • Further analysis of offending behaviour of this group and an understanding of the underlying causes will ensure improved outcomes including diversion from crime.
Disability (including carers of disabled people)		x	The number of Young Offenders with a speech and language or learning disability is an emerging theme.	<ul style="list-style-type: none"> • The YOT Management Board has requested data in regards to those offending with a disability to ensure interventions and resources are appropriate and support to address the causes of offending behaviour. • Responding to those not in education or employment (NEET) is a priority with a co-ordinated approach with educational leads in the YOT. • The attendance of a Head Teacher at the Risk Management Panel will assist greatly in understanding and responding to the challenges faced by this group.
Gender Reassignment			No Identified Impact.	
Marriage and Civil Partnership			No Identified Impact.	

Pregnancy and Maternity			No identified impact	
Race		x	The data analysis highlights there is a disproportionate proportion of young offenders from White British (42%) and Black Ethnic Group ((43%) when compared with the local demographic.	<ul style="list-style-type: none"> The YOT Management Board have requested more intelligence regarding both groups in order to gain improved understanding of the underlying causes and target specific interventions aimed at responding to the issues highlighted.
Religion or Belief			No identified impact.	
Sex		x	There are a high percentage of young male offenders (83%) in comparison to female offenders (17%).	<ul style="list-style-type: none"> The YOT Management Board has requested more intelligence regarding both groups in order to gain improved understanding of the underlying causes and target specific interventions aimed at responding to the issues highlighted. The causation between involvement in Gangs and offending behaviour is well documented nationally but needs to be further exploration in regards to activity in Harrow for this cohort of offenders. Work is underway through the multi-agency Gangs Forum. The work includes intelligence gathering in regards to Gangs active in Harrow and the link between substance misuse and Gang involvement. In addition further analysis is required for the underlying offending behaviour of young women including the risk of sexual exploitation and gang involvement.
Sexual orientation			No identified impact.	

10. Cumulative Impact – Considering what else is happening within the Council and Harrow as a whole, could your proposals have a cumulative impact on a particular Protected Characteristic? If yes, which Protected Characteristics could be affected and what is the potential impact?					Yes		No		x
10a. Any Other Impact – Considering what else is happening within the Council and Harrow as a whole (for example national/local policy, austerity, welfare reform, unemployment levels, community tensions, levels of crime) could your proposals have an impact on individuals/service users socio economic, health or an impact on community cohesion? If yes, what is the potential impact and how likely is to happen?					Yes		No		
11. Is there any evidence or concern that the potential adverse impact identified may result in a Protected Characteristic 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) available on Harrow HUB/Equalities and Diversity/Policies and Legislation									
	Age (including carers)	Disability (including carers)	Gender Reassignment	Marriage and Civil Partnership	Pregnancy and Maternity	Race	Religion and Belief	Sex	Sexual Orientation
Yes									
No	x	x	x	x	x	x	x	x	x
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 6: 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: the EqIA has not identified any potential for unlawful conduct or disproportionate impact and all opportunities to advance equality are being addressed.	x
Outcome 2 – Minor adjustments to remove / mitigate adverse impact or advance 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 7</i>	
Outcome 3 – Continue with proposals despite having identified potential for adverse impact or missed opportunities to advance 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)	
12a. If your EqIA is assessed as outcome 3 or you have ticked 'yes' in Q11 , explain your justification with full reasoning to continue with your proposals.	

Stage 7: 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 impact e.g. Race, Disability	Action required to mitigate	How will you know this is achieved? E.g. Performance Measure / Target	Target Date	Lead Officer	Date Action included in Service / Team Plan

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Stage 8 - Monitoring

The full impact of the proposals may only be known after they 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? What monitoring measures need to be introduced to ensure effective monitoring of your proposals? How often will you do this? <i>(Also Include in Improvement Action Plan at Stage 7)</i>	The monitoring of the plan will continue through the Youth Offending Management Board where there is representation from the partnership and the Youth Justice Board. There are bi-monthly performance reports submitted against the YJB Plan.
15. How will the results of any monitoring be analysed, reported and publicised? <i>(Also Include in Improvement Action Plan at Stage 7)</i>	Monitoring will take place through the bi-monthly YOT Management Board
16. Have you received any complaints or compliments about the proposals being assessed? If so, provide details.	No

Stage 9: Public Sector Equality Duty

17. How do your proposals contribute towards 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
The plan was developed aligned to the council's equality of opportunity policy and does not exclude any protected characteristic.	The plan aims to advance equality of opportunity by taking the necessary steps to address identified needs as highlighted in order to ensure the service is inclusive to the community of Harrow.	Strength partnership working with key community groups through dialogue, understanding, training and representation of a diverse team and service delivery.

Stage 10 - Organisational sign Off (to be completed by Chair of Departmental Equalities Task Group)

The completed EqIA needs to be sent to the chair of your Departmental Equalities Task Group (DETG) to be signed off.

18. Which group or committee considered, reviewed and agreed the EqIA and the Improvement Action Plan?			
Signed: (Lead officer completing EqIA)		Signed: (Chair of DETG)	
Date:		Date:	
Date EqIA presented at the EqIA Quality Assurance Group		Signature of ETG Chair	