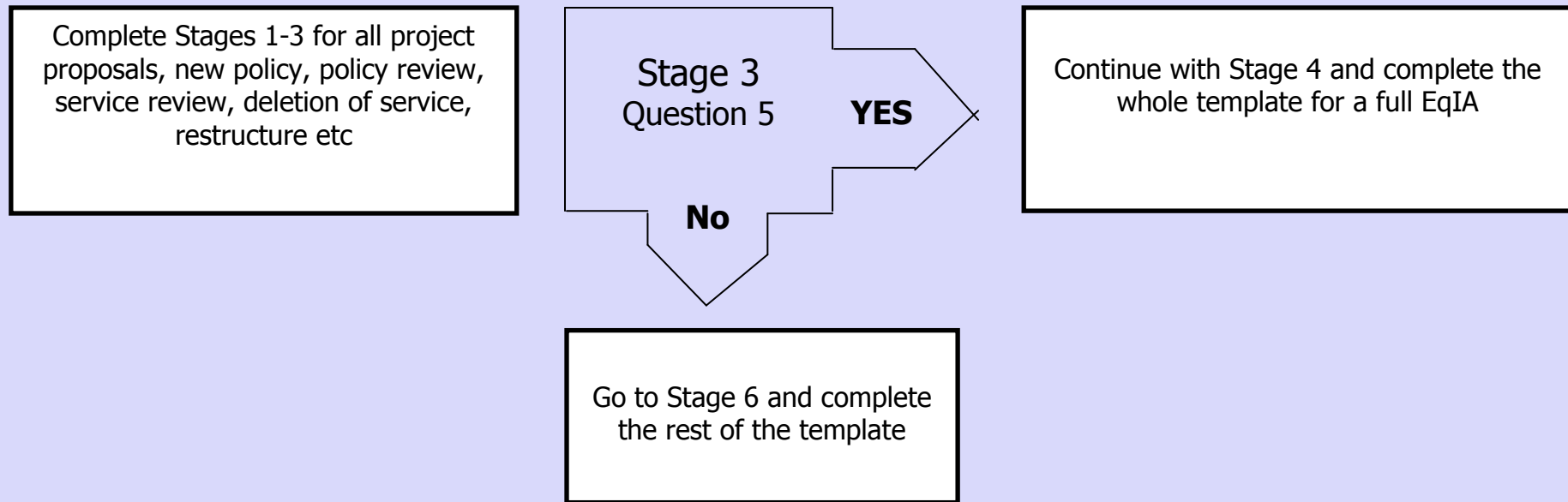


# Equality Impact Assessment Template

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



- In order to complete this assessment, it is important that you have read the Corporate Guidelines on EqIAs and preferably completed the EqIA E-learning Module.
- You are also encouraged to refer to the EqIA Template with Guidance Notes to assist you in completing this template.
- **SIGN OFF:** All EqIAs need to be signed off by your Directorate Equality Task Groups. EqIAs relating to Cabinet Reports need to be submitted to the EqIA Quality Assurance Group at least one month before your Cabinet Report date. This group meets on the first Monday of each month.
- Legal will NOT accept any reports without a fully completed, Quality Assured and signed off EqIA.

The EqIA Guidance, Template and sign off process is available on the Hub under Equality and Diversity

## Equality Impact Assessment (EqIA) Template

|   |  |         |  |                  |  |                 |  |
|---|--|---------|--|------------------|--|-----------------|--|
| <b>Type of Decision: Tick ✓</b>   | ✓  | Cabinet |  | Portfolio Holder |  | Other (explain) |  |
| Date decision to be taken:  |  |         |  |                  |  |                 |  |
| Value of savings to be made (if applicable):                            |  |         |  |                  |  |                 |  |
| Title of Project:   | Consultation on proposed realignment of management arrangements for: Education Strategy and School Organisation, HSIP, Virtual school for Looked after children, Children with Disabilities Service, Adult Transition Team, the Firs Short Break Centre, Children's Sensory Team, Portage Home visiting service, Educational Psychology Service, Autistic Spectrum Team, SEN Assessment and Review Service |         |  |                  |  |                 |  |
| Directorate / Service responsible:                                      | People Services Directorate  |         |  |                  |  |                 |  |
| Name and job title of Lead Officer:                                     | Pauline Nixon Interim Divisional Director Education and Commissioning  |         |  |                  |  |                 |  |
| Name & contact details of the other persons involved in the assessment: | Visva Sathasivam, Roger Rickman  |         |  |                  |  |                 |  |
| Date of assessment (including review dates):                            | 24.12.15   |         |  |                  |  |                 |  |

### Stage 1: Overview

|   |   |
|---|---|
| <p><b>1. What are you trying to do?</b></p> <p>(Explain your proposals here e.g. introduction of a new service or policy, policy review, changing criteria, reduction / removal of service, restructure, deletion of posts etc)</p> | <p>The government's national policy for local government is characterised by austerity and the regionalisation and devolution agendas. The key elements of policy for education and local authorities are:</p> <ul style="list-style-type: none"> <li>• Increasing autonomy of schools through academisation and 500 free schools</li> <li>• Promoting sector led development</li> <li>• Establishing a regional tier of accountability through the Regional Schools Commissioners.</li> </ul> <p>Harrow council faces very significant funding challenges. These include the requirement to identify savings worth approximately 30% of its controllable budget between 2010-2015 and a further £83 million of savings between 2015-2019. The 2016 efficiency target for Children's services (now People Services) amount to over £6 million with a further £10 million by 2019/20.</p> <p>The council's senior management restructure was approved by the council's Cabinet on 17 June 2015 and created three directorates. The People Services Directorate was created from the Children and Families Directorate and parts of the Community, Health and Wellbeing Directorate, bringing together services for children and young people</p> |
|---|---|

and adults and public health services.

The senior management restructure deleted the post of Divisional Director, Special Needs Services and the post of Divisional Director, Education and Commissioning. The intention was to merge these two roles into a single post of Divisional Director, Education Services, and bring together the Children's Sensory Team, the Educational Psychology Service and the SEN Assessment and Review Service with more universal services such as Harrow School Improvement Partnership and the strategic functions of school place planning, school admissions, early years and services for the 16-25 year age group.

The significant financial savings needed to be made by the council over the next three years have however, led to the December cabinet meeting agreeing to delete the single post of Divisional Director, Education Services. This alters substantially the anticipated structure that was expected to apply to services within the ESSO, HSIP, Special Needs Services Division and the Education and Commissioning Division in the new People Services Directorate.

The consultation will focus on the following options:

1. Job match followed by ring fence the posts of: Service Manager SEN Assessment and Review Service, the Principal Educational Psychologist and the Sensory Team to create a new Head of Service post for SEN services. The post holder will line manage the SEN services and will also assume some additional responsibilities held currently by the Divisional Director, Special Needs Service. The post holder will report to the Corporate Director, People Services
2. The Service Manager SEN Assessment and Review and the Principal Educational Psychologist will report to the Head of Service Education Strategy
3. The Team Manager Children's Sensory will report to the Head of Education Services

All other roles are unchanged.

Role profiles will be evaluated following the consultation according to the model agreed.

|  |   |   |                                |                         |
|--|---|---|--------------------------------|-------------------------|
|  | There is no adverse affect on any protected characteristic in the client base (Stage 2 below) as the statutory functions will continue to be met and no member of staff will be affected by redundancy. |   |                                |                         |
| <b>2. Who are the main people / Protected Characteristics that may be affected by your proposals? (✓ all that apply)</b>   | Residents / Service Users   |   | Partners                       | Stakeholders            |
|  | Staff   | ✓ | Age                            | Disability              |
|  | Gender Reassignment   |   | Marriage and Civil Partnership | Pregnancy and Maternity |
|  | Race  |   | Religion or Belief             | Sex                     |
|  | Sexual Orientation  |   | Other                          |                         |
| <b>3. Is the responsibility shared with another directorate, authority or organisation? If so:</b><br><ul style="list-style-type: none"> <li>Who are the partners?</li> <li>Who has the overall responsibility?</li> <li>How have they been involved in the assessment?</li> </ul> | The directorate is now a People Services Directorate and the services affected are all within this directorate and include: Education, Adult Social Care and SEN services.                              |   |                                |                         |

## Stage 2: Evidence & Data Analysis

4. What evidence is available to assess the potential impact of your proposals? 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, press reports, letters from residents and complaints etc. Where possible include data on the nine Protected Characteristics.

(Where you have gaps (data is not available/being collated for any Protected Characteristic), you may need to include this as an action to address in your Improvement Action Plan at Stage 6)

| Protected Characteristic                         | Evidence | Analysis & Impact  |
|--|----------|--|
| Age (including carers of young/older people)     |          | There is no identified impact based on this characteristic |
| Disability (including carers of disabled people) |          | There is no identified impact based on this characteristic |

|                              |  |   |
|------------------------------|--|---|
| Gender Reassignment          |  | There is no identified impact based on this characteristic  |
| Marriage / Civil Partnership |  | There is no identified impact based on this characteristic  |
| Pregnancy and Maternity      |  | There is no identified impact based on this characteristic  |
| Race                         |  | There is no identified impact based on this characteristic  |
| Religion and Belief          |  | There is no identified impact based on this characteristic. |
| Sex / Gender                 |  | There is no identified impact based on this characteristic. |
| Sexual Orientation           |  | There is no identified impact based on this characteristic. |

### Stage 3: Assessing Potential Disproportionate Impact

**5.** 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<br>(including carers) | Disability<br>(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 6

#### Stage 4: Further Consultation / Additional Evidence

6. What further consultation have you undertaken on your proposals as a result of your analysis at **Stage 3**?

| Who was consulted?<br>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? E.g. revising your proposals |
|--|--|---|
| There has been initial consultation with HSIP Board about the future model.  | N/A  |   |
| Any staff reductions will be managed in line with the Council's policies and procedures, including Organisational Change, and thus comply with employment law. | N/A  |   |
|  |  |   |

#### Stage 5: Assessing Impact

7. What does your evidence tell you about the impact on the different Protected Characteristics? Consider whether the evidence shows potential for differential impact, if so state whether this is a positive or an adverse impact? If adverse, is it a minor or major impact?

| Protected Characteristic | Positive Impact | Adverse Impact | Explain what this impact is, how likely it is to happen and the extent of impact if it was to | What measures can you take to mitigate the impact or advance equality of opportunity? |
|--------------------------|-----------------|----------------|---|---|
|                          |                 |                |   |   |

|  | ✓ | Minor<br>✓ | Major<br>✓ | occur.<br><b>Note – Positive impact can also be used to demonstrate how your proposals meet the aims of the PSED Stage 7</b> | E.g. further consultation, research, implement equality monitoring etc<br><b>(Also Include these in the Improvement Action Plan at Stage 6)</b> |
|--|---|------------|------------|--|---|
| Age (including carers of young/older people)     |   |            |            | Go to Stage 6  |   |
| Disability (including carers of disabled people) |   |            |            | Go to Stage 6  |   |
| Gender Reassignment                              |   |            |            | Go to Stage 6  |   |
| Marriage and Civil Partnership                   |   |            |            | Go to Stage 6  |   |
| Pregnancy and Maternity                          |   |            |            | Go to Stage 6  |   |
| Race   |   |            |            | Go to Stage 6  |   |

|   |  |  |  |               |    |
|---|--|--|--|---------------|----|
|   |  |  |  |               |    |
| Religion or Belief  |  |  |  | Go to Stage 6 |    |
| Sex   |  |  |  | Go to Stage 6 |    |
| Sexual orientation  |  |  |  | Go to Stage 6 |    |
| <b>8. Cumulative Impact</b> – 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?<br><br>If yes, which Protected Characteristics could be affected and what is the potential impact?   |  |  |  | Yes           | No |
|   |  |  |  |               |    |
| <b>9. Any Other Impact</b> – 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?<br><br>If yes, what is the potential impact and how likely is it to happen? |  |  |  | Yes           | No |
|   |  |  |  |               |    |
| <b>Stage 6 – Improvement Action Plan</b>  |  |  |  |               |    |
| List below any actions you plan to take as a result of this Impact Assessment. These should include:  |  |  |  |               |    |
| <ul style="list-style-type: none"> <li>Proposals to mitigate any adverse impact identified</li> <li>Positive action to advance equality of opportunity</li> <li>Monitoring the impact of the proposals/changes once they have been implemented</li> </ul>   |  |  |  |               |    |



- Any monitoring measures which need to be introduced to ensure effective monitoring of your proposals? How often will you do this?

| Area of potential adverse impact e.g. Race, Disability | Proposal to mitigate adverse impact | How will you know this has been achieved? E.g. Performance Measure / Target | Lead Officer/Team | Target Date |
|--|-------------------------------------|---|-------------------|-------------|
|  |                                     |   |                   |             |
|  |                                     |   |                   |             |
|  |                                     |   |                   |             |

### Stage 7: Public Sector Equality Duty

**10.** How do your proposals meet the Public Sector Equality Duty (PSED) which requires the Council to:

- 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

Any changes that arise to staffing structures will be implemented in accordance with the Council's Protocol for Managing Organisational Change.

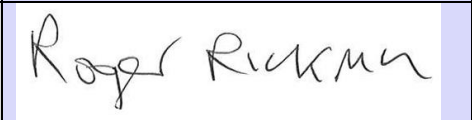
### Stage 8: Recommendation

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

|  |   |
|--|---|
| <b>Outcome 1</b> – No change required: the EqIA has not identified any potential for unlawful conduct or disproportionate impact and all opportunities to advance equality of opportunity are being addressed.   | ✓ |
| <b>Outcome 2</b> – Minor Impact: Minor adjustments to remove / mitigate adverse impact or advance equality of opportunity have been identified by the EqIA and these are listed in the Action Plan above.  |   |
| <b>Outcome 3</b> – Major Impact: Continue with proposals despite having identified potential for adverse impact or missed opportunities to advance equality of opportunity. 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. <b>(Explain this in Q12 below)</b> |   |

|  |  |
|--|--|
| <p><b>12.</b> If your EqIA is assessed as <b>outcome 3</b> explain your justification with full reasoning to continue with your proposals.</p> |  |
|--|--|

**Stage 9 - Organisational sign Off**

|  |                        |                                |   |
|--|------------------------|--------------------------------|---|
| <p><b>13.</b> Which group or committee considered, reviewed and agreed the EqIA and the Improvement Action Plan?</p> |                        |                                |   |
| <p>Signed: (Lead officer completing EqIA)</p>  | <p>Pauline Nixon</p>   | <p>Signed: (Chair of DETG)</p> | <p>Roger Rickman</p>  |
| <p>Date:</p>   | <p>3 November 2015</p> | <p>Date:</p>                   | <p>15.1.16</p>  |
| <p>Date EqIA presented at the EqIA Quality Assurance Group (if required)</p>   |                        | <p>Signature of DETG Chair</p> |  |