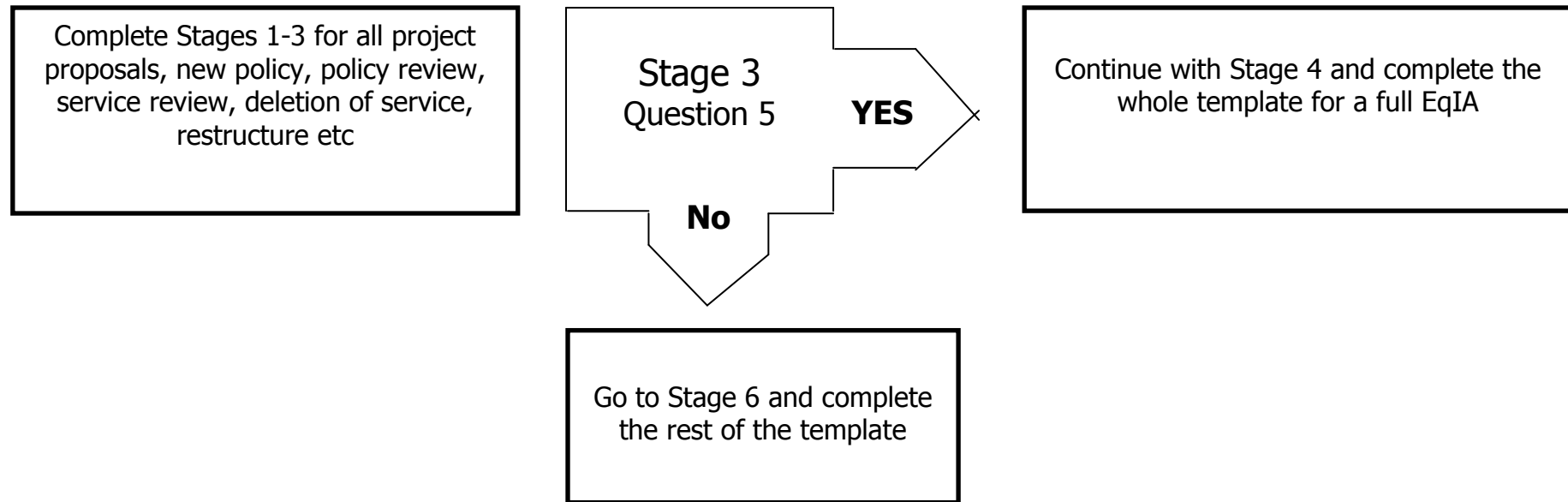


- Confidential Initial - Equality Impact Assessment Template

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.
- Legal will NOT accept any report 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

Type of Decision: Tick ✓	✓	Cabinet		Portfolio Holder		Other (explain)	
Date decision to be taken:	16 th February 2017						
Value of savings to be made (if applicable):	£112k						
Title of Project:	PA_06 Safeguarding Assurance and Quality Service Team						
Directorate / Service responsible:	People Services: Adult Social Care						
Name and job title of Lead Officer:	Chris Greenway: Head of Safeguarding Assurance and Quality Services						
Name & contact details of the other persons involved in the assessment:	Chris Greenway ext 2043						
Date of assessment (including review dates):	Initial: 6 th September 2016 Review: 27 th January 2017						

Stage 1: Overview

<p>1. What are you trying to do?</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 Safeguarding Assurance & Quality Services team carry out all activities linked to reviewing provider safeguarding concerns, provider performance against regulated standards and quality monitoring delivered by over 700 external providers (Residential Care Homes, Nursing Care Homes, Domiciliary Care Providers and Day Care Services).</p> <p>The team will investigate concerns raised by the CQC in its role in identifying situations that give rise to concern that a person using a regulated service is, or has been, at risk of harm. Following referral, the team in liaison with the Safeguarding team, will participate in any strategy discussions and consider on-going risk factors and any necessary action plans with providers to ensure service users are safe. These plans will then be regularly monitored and checked to ensure standards are being maintained.</p> <p>The team through annual checks on safeguarding and quality ensure that all providers across the Borough and where clients are placed externally meet minimum standards and help them to achieve 'Good' levels of care with an emphasis on continual improvement.</p> <p>The team have consistently helped providers that have failed through inspection to meet the regulators minimum standards to develop action plans that have moved them to 'Good' ratings and above the Country average. The team look at all aspects of the care and support provided including Staffing & Mgt, Care & Support Planning, Medication management & control, Safety, Quality of Care. In undertaking these monitoring reviews, the team are able to monitor the chances of provider failure as required under the Care Act 2014; the functions of this team cannot prevent a provider from failing but may provide useful indicators to allow Adult Services to better prepare when/ if it does happen.</p>
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The team have on several occasions prevented actual harm to individual clients by the identification of poor and sometimes dangerous practices. These safeguarding assurances continue to ensure that Harrow has not received the same media attention seen in other Boroughs and reduced the reputational risks to the Council as part of its duty to safeguard the most vulnerable.

The team meet regularly with the Care Quality Commission and work closely with regional inspectors to ensure continued sharing of intelligence and concerns. The team will also implement and enforce any local or regulatory action (temporary suspensions, embargo, special measures regime) and provide updates to all Local Authorities as required by statute. The CQC have widely acknowledged the SAQs team in Harrow as an exemplar for its work on Safeguarding and Monitoring and consider the team to be the best in London.

The Local Account group is also facilitated through the SAQs team and this group have been responsible for the development of the Local Accounts, Mystery Shopping, Surveys, Questionnaires, Roadshows, Recruitment panels and participation at the Adults Safeguarding Board.

The team provide regular updates to providers on standards through its work with CQC, NICE, Skills for Care and other bodies working to maintain standards in this sector especially at a time of increased pressures in the market including competition for skilled and suitably qualified staff. This work also includes regular provider forums to discuss major issues and changes in the markets as well as training development programs co-ordinated by the team.

The team will also assist families that have raised concerns/complaints about the level of care provided by care homes and providers. This has included covert recording of practices and this work with families has led to criminal prosecutions of care workers and provider management.

The team currently consists of 1 Team Manager, 2 Senior Safeguarding & Quality Officers (including 1 Nurse), and 4 Safeguarding Assurance & Quality Monitoring Officers.

Savings Proposal:

The proposed change is to reduce the number of staff in the SAQs quality monitoring team and further risk matrix prioritise reviews and reduce performance reporting

This proposal delivers £112k in 2017/2018.

2. Who are the main groups / Protected Characteristics that may be affected by your proposals? (✓ all that apply)	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			
3. Is the responsibility shared with another directorate, authority or organisation? If so: <ul style="list-style-type: none"> Who are the partners? Who has the overall responsibility? How have they been involved in the assessment? 	The responsibility for this proposal remains within Adult 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 should 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)	Staff Records: All staff impacted are of working age FWI Data CQC Records	All staff impacted are working age adults There will potentially be an impact on older adults resident in the London borough of harrow due to the reduction in capacity within the team to monitor domiciliary and residential base care services.

Disability (including carers of disabled people)	<p>Staff Records</p> <p>No staff have declared they have a disability</p> <p>FWI Data</p> <p>CQC Records</p>	<p>No Staff have declared they have a disability therefore, we have no evidence of a differential impact on this group at this time.</p> <p>There will potentially be an impact on disabled adults resident in the London borough of harrow due to the reduction in capacity within the team to monitor domiciliary and residential base care services.</p>
Gender Reassignment	Staff Records	No staff have declared they have undergone gender reassignment therefore we have no evidence of a differential impact on this group at this time.
Marriage / Civil Partnership	Staff Records	We have no evidence of a differential impact on this group at this time
Pregnancy and Maternity	Staff Records	There are staff with this protected characteristic. However there is no impact on their legal and statutory rights.
Race	<p>Staff Records</p> <p>Staff are from a variety of different racial groups</p>	This proposal has an impact on a mix of staff from a variety of different racial groups, and we have no evidence of a differential impact on this group at this time.
Religion and Belief	<p>Staff Records</p> <p>Staff have declared a variety of different religions and beliefs</p>	This proposal has an impact on a mix of staff of different religions and beliefs, and we have no evidence of a differential impact on this group at this time
Sex / Gender	Staff Records	The team impacted by this proposal are predominantly female. Therefore this proposal has a slightly stronger

		impact on female staff than male.
Sexual Orientation	Staff Records	We have no evidence of a differential impact on this group at this time

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

YES - If there is a risk of disproportionate adverse Impact on any **ONE** of the Protected Characteristics, complete a FULL EqIA.

- **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? 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
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		proposals
If this proposal is accepted there will be a staff consultation		

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 occur. Note – Positive impact can also be used to demonstrate how your proposals meet the aims of the PSED Stage 7	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 6)
		Minor ✓	Major ✓		
Age (including carers of young/older people)		✓		<p>All staff impacted by this proposal are working age adults meaning that should this proposal go ahead the impact is disproportionate to working age adults</p> <p>There will potentially be an impact on older adults resident in the London borough of harrow due to the reduction in capacity within the team to monitor domiciliary and residential base care services.</p>	<p>There would be full and early engagement with staff and trade unions, including a full consultation process. In order to avoid redundancies, the Council's redeployment procedures would be utilised, and the Council would strive to ensure alternative employment within the range of services it provides. Staff would be offered additional training to ensure they have the necessary skills to take up a new role. Voluntary redundancy would be offered to all staff. Sensitive and timely support services will be put in place for all staff during the period of consultation.</p> <p>In order to mitigate some of the impact to older residents the remaining team will further risk matrix prioritise reviews and reduce performance reporting. Resources will be targeted to the cases with the highest risk.</p>

Disability (including carers of disabled people)		✓		There will potentially be an impact on disabled adults resident in the London borough of harrow due to the reduction in capacity within the team to monitor domiciliary and residential base care services.	In order to mitigate some of the impact to disabled residents the remaining team will further risk matrix prioritise reviews and reduce performance reporting. Resources will be targeted to the cases with the highest risk.
Gender Reassignment					
Marriage and Civil Partnership					
Pregnancy and Maternity		✓		There are staff with this protected characteristic. However there is no impact on their legal and statutory rights.	There would be full and early engagement with staff and trade unions, including a full consultation process. In order to avoid redundancies, the Council's redeployment procedures would be utilised, and the Council would strive to ensure alternative employment within the range of services it provides. Staff would be offered additional training to ensure they have the necessary skills to take up a new role. Voluntary redundancy would be offered to all staff. Sensitive and timely support services will be put in place for all staff during the period of consultation..
Race					

Religion or Belief													
Sex		✓		The majority of staff impacted by this proposal are female meaning that should this proposal go ahead the impact is disproportionate to females	There would be full and early engagement with staff and trade unions, including a full consultation process. In order to avoid redundancies, the Council's redeployment procedures would be utilised, and the Council would strive to ensure alternative employment within the range of services it provides. Staff would be offered additional training to ensure they have the necessary skills to take up a new role. Voluntary redundancy would be offered to all staff. Sensitive and timely support services will be put in place for all staff during the period of consultation.								
Sexual orientation													
8. 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?					<table border="1"> <tr> <td>Yes</td> <td>✓</td> <td>No</td> <td></td> </tr> <tr> <td colspan="4"> This proposal is one of many across the Council which may see a reduction in staffing levels, as a result there is likely to be increased pressure on redeployment opportunities. </td> </tr> </table>	Yes	✓	No		This proposal is one of many across the Council which may see a reduction in staffing levels, as a result there is likely to be increased pressure on redeployment opportunities.			
Yes	✓	No											
This proposal is one of many across the Council which may see a reduction in staffing levels, as a result there is likely to be increased pressure on redeployment opportunities.													
9. 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 it to happen?					<table border="1"> <tr> <td>Yes</td> <td></td> <td>No</td> <td></td> </tr> <tr> <td colspan="4"></td> </tr> </table>	Yes		No					
Yes		No											

Stage 6 – Improvement Action Plan

List below any actions you plan to take as a result of this Impact Assessment. These should include:

- Proposals to mitigate any adverse impact identified
- Positive action to advance equality of opportunity
- Monitoring the impact of the proposals/changes once they have been implemented
- 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
Age, Sex	Consultation with staff and trade unions, and review of redeployment options	Outcomes for the Staff concerned	Chris Greenway	

Stage 7: Public Sector Equality Duty

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

1. Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010
2. Advance equality of opportunity between people from different groups
3. Foster good relations between people from different groups

The proposal impacts on a very small number of staff, and as such, redeployment and other internal mechanisms should go some way to limit the adverse impacts of the proposals.

Stage 8: Recommendation

11. 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 of opportunity are being addressed.

✓

Outcome 2 – Minor Impact: Minor adjustments to remove / mitigate adverse impact or advance equality of opportunity have been identified by the EqIA and these are included in the Action Plan to be addressed.	
Outcome 3 – 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. (Explain this in Q12 below)	
12. If your EqIA is assessed as outcome 3 explain your justification with full reasoning to continue with your proposals.	

Stage 9 - Organisational sign Off

13. 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 Cabinet Briefing (if required)		Signature of DETG Chair (following Cabinet Briefing if relevant)	