

## Equality Impact Assessment (EqIA) Template

<b>Type of Decision: Tick ✓</b>	✓	Cabinet		Portfolio Holder		Other (explain)	
Date decision to be taken:	16 <sup>th</sup> February 2017						
Value of savings to be made (if applicable):	£113 k						
Title of Project:	PA_08 Occupational Therapy Service						
Directorate / Service responsible:	People Services: Adult Social Care						
Name and job title of Lead Officer:	Visva Sathasivam, Head of Adult Social Care						
Name & contact details of the other persons involved in the assessment:	Chris Greenway: 2043						
Date of assessment (including review dates):	Initial: 6 <sup>th</sup> September 2016 Review: 27 <sup>th</sup> January 2017						

### 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>In Harrow in the last 3-4 years we have reduced the number of OT's. At the moment the OT service is the smallest OT service in London per population and is stretched, with a waiting list of over 6 months including a significant number of children with disabilities.</p> <p>The OT Team support vulnerable and disabled children and adults to remain living in their own homes in the community and so prevent high cost care packages and placements. The OT service facilitates hospital discharges, prevents hospital admissions, and prevents homelessness.</p> <p>There are a number of duties under various acts that require local authorities to access OT advice:</p> <ul style="list-style-type: none"> <li>• Care Act 2014 and the duty to assess needs.</li> <li>• Chronically Sick and Disabled Persons Act 1970 requires social services authorities to provide assistance in the home and adaptations.</li> <li>• Housing Grants Construction and Regeneration Act 1996 : responsibility on local authorities to provide Mandatory Disabled Facilities Grants.</li> <li>• The Community Care ( Delayed Discharges etc. ) Act 2003 –responsibility on local authorities to provide equipment and adaptation for items under £1000.</li> <li>• Children Act 1989 – responsibility on local authorities to provide services to minimise the effects on disabled children.</li> <li>• Carers and Disabled Children's Act 2000 –responsibility on local authorities to provide</li> </ul>
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services to help the carer care for the child cared for.

OT's carry out specialist assessments and recommend equipment, and minor adaptations to use in their home environment to promote independence and minimise the need for formal support (e.g. a paid carer to assist with mobilising around their home and getting on and off the toilet/bed/ chair/shower etc.). This includes carrying out Moving And Handling assessments for those with complex health needs. OT's provide detailed guidance for families / carers on the safe transfers of people using hoists, and other equipment to prevent falls, pressure sores, contractures, ulcers etc.

Where the property is not appropriate for the child / adults needs, OT's must determine what is necessary and appropriate to meet the eligible needs and make recommendations for adaptations to Harrow Adaptation Team who manage the Disabled Facilities Budget and work with the OT's in considering what is a reasonable and practical adaptation to meet the needs. One of the preconditions for the BCF is to provide DFGs and OT services this also meets the statutory requirements of the Council.

The OT's work closely with the Housing Department to prevent homelessness and ensure appropriate accommodation. They work closely with health professionals in acute, secondary care settings, and in the community in enabling people to remain living at home.

Equipment and adaptations are important components in Adult Social Care's prevention and wellbeing agenda.

**Savings Proposal:**  
The current OT service consists of 1 OT Team Manager, 8 OT's and 1 Trusted Assessor.  
From April 2017 this proposal is to reduce the OT service creating a saving of £113,000.

<p><b>2. Who are the main groups / Protected Characteristics that may be affected by your proposals? (✓ all that apply)</b></p>	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.</b> Is the responsibility shared with another directorate, authority or organisation? If so: <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 responsibility for this proposal remains within the People Directorate.			

**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)	<p>Staff Records</p> <p>This is likely to directly disadvantage older persons and carers.</p> <p>FWI Records</p> <table border="1"> <thead> <tr> <th>AGEGROUP</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>18-64</td> <td>262</td> </tr> <tr> <td>65-74</td> <td>121</td> </tr> <tr> <td>75-84</td> <td>225</td> </tr> <tr> <td>85+</td> <td>196</td> </tr> <tr> <td>Under 18</td> <td>40</td> </tr> <tr> <td>Grand Total</td> <td>844</td> </tr> </tbody> </table>	AGEGROUP	Total	18-64	262	65-74	121	75-84	225	85+	196	Under 18	40	Grand Total	844	<p>This proposal has a direct impact on 8 staff members, all of which are of working age.</p> <p>Further information is required for the staff and will be collated during the next stage.</p> <p>Reduction in the numbers of OT staff could mean increased waiting times for assessment and therefore delay in receiving equipment to remain independent; there may also be impacts on residential and hospital settings with people waiting for equipment before they can safely return to their homes. The level of delay and impact on other services will be monitored closely if this proposal is accepted.</p> <p>Records show that the majority of assessments</p>
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Under 18	40															
Grand Total	844															

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		undertaken in the last 12 months are people over 65 (542) although there is a substantial number of working age (262) and a smaller number of Children (40).
Disability (including carers of disabled people)	<p>Staff Records</p> <p>This is likely to directly disadvantage people with a disability.</p> <p>FWI 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>Reduction in the numbers of OT staff could mean increased waiting for assessment and therefore delay in receiving equipment to remain independent; there may also be impacts on residential and hospital settings with people waiting for equipment before they can safely return to their homes. The level of delay and impact on other services will be monitored closely if this proposal is accepted.</p> <p>Records show that the most common primary support need for people to be assessed by the OT team is Physical support (701 out of 844 assessments undertaken in the last 12 months)</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	<p>Staff Records</p> <p>This should not disadvantage people with this protected characteristic.</p>	There are staff with this protected characteristic. However there is no impact on their legal and statutory rights.

Race	Staff Records		<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.</p> <p>The majority of service users who have received a OT assessment in the last 12 months are Asian or Asian British, even though the service is not specifically aimed at people with an Asian or Asian British background we will continue to monitor this characteristic if changes are made and look to fully engage with service users to ensure any negative impact is minimised.</p>	
	FWI Records			
	ETHNICITY	SUBETHNICITY		Total
	Asian or Asian British	Afghan		2
		Any other Asian background		88
		Bangladeshi		2
		Indian		205
		Pakistani		24
		Sri Lankan		13
	Asian or Asian British Total			334
	Black or Black British	African		29
		Any other Black background		16
		Caribbean		35
		Somali		7
	Black or Black British Total			87
Mixed background	Any other mixed background	4		
	White and Asian	5		
	White and Black African	1		
	White and Black Caribbean	3		
Mixed background Total		13		
Not Stated	Did not wish to reply	2		
	Form not completed	2		
Not Stated Total		4		
Other Ethnic background	Any other ethnic group	28		
	Arab	5		
	Iranian	4		
Other Ethnic		37		

	<table border="1"> <tr> <td colspan="2">background Total</td> <td></td> </tr> <tr> <td rowspan="5">White or White British</td> <td>Any other White background</td> <td>21</td> </tr> <tr> <td>English</td> <td>298</td> </tr> <tr> <td>Irish</td> <td>24</td> </tr> <tr> <td>Polish</td> <td>1</td> </tr> <tr> <td>Romanian</td> <td>1</td> </tr> <tr> <td></td> <td>Scottish</td> <td>3</td> </tr> <tr> <td colspan="2">White or White British Total</td> <td>348</td> </tr> <tr> <td>(blank)</td> <td>(blank)</td> <td>21</td> </tr> <tr> <td colspan="2">(blank) Total</td> <td>21</td> </tr> <tr> <td colspan="2">Grand Total</td> <td>844</td> </tr> </table>	background Total			White or White British	Any other White background	21	English	298	Irish	24	Polish	1	Romanian	1		Scottish	3	White or White British Total		348	(blank)	(blank)	21	(blank) Total		21	Grand Total		844	
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<p>Religion and Belief</p>	<p>Staff Records</p> <p>This should not disadvantage people with this protected characteristic.</p> <p>FWI Records</p> <table border="1"> <tr> <td>Buddhism</td> <td>4</td> </tr> <tr> <td>Catholic</td> <td>46</td> </tr> <tr> <td>Christian (all denominations)</td> <td>199</td> </tr> <tr> <td>Hinduism</td> <td>195</td> </tr> <tr> <td>Islam</td> <td>102</td> </tr> <tr> <td>Jainism</td> <td>10</td> </tr> <tr> <td>Judaism</td> <td>48</td> </tr> <tr> <td>No Religion / Atheist</td> <td>14</td> </tr> <tr> <td>Not Known</td> <td>15</td> </tr> <tr> <td>Not Stated</td> <td>40</td> </tr> <tr> <td>Other Religion</td> <td>26</td> </tr> <tr> <td>Sikh</td> <td>10</td> </tr> <tr> <td>(blank)</td> <td>135</td> </tr> <tr> <td>Grand Total</td> <td>844</td> </tr> </table>	Buddhism	4	Catholic	46	Christian (all denominations)	199	Hinduism	195	Islam	102	Jainism	10	Judaism	48	No Religion / Atheist	14	Not Known	15	Not Stated	40	Other Religion	26	Sikh	10	(blank)	135	Grand Total	844	<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.</p> <p>The majority of service users who have had an assessment in the last 12 months have identified as Christian or Hindu. This is in line with the borough profile and as such does not provide any evidence of a differential impact on this group at this time.</p>	
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<p>Sex / Gender</p>	<p>Staff Records</p>	<p>The staff impacted by this proposal are all female.</p>																													

	<p>FWI Records</p> <table border="1"> <tr> <td>Female</td> <td>500</td> </tr> <tr> <td>Male</td> <td>342</td> </tr> </table>	Female	500	Male	342	<p>The majority of service users who have had an assessment in the last 12 months have been female, as such there is a slightly higher impact on female service users. We will monitor this impact if the proposal is accepted and work collaboratively with service users to ensure that any potential impact is mitigated as much as possible.</p>
Female	500					
Male	342					
Sexual Orientation	<p>Staff Records</p> <p>This should not disadvantage people with this protected characteristic.</p>	<p>We have no evidence of a differential impact on this group at this time</p>				

**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 proposals
If this proposal is accepted, all staff members will be consulted formally		

**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?



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	✓	Minor ✓	Major ✓	occur. <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 <b>(Also Include these in the Improvement Action Plan at Stage 6)</b>
Age (including carers of young/older people)		✓		<p>If this proposal is accepted the staff affected are all within the 'working age' bracket.</p> <p>All eligible service users can benefit from this service but specifically those people who are discharged from hospital or living at home that require support in the form of equipment to enable this to happen or continue living at home.</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>The impacts on residents will be kept under review and we will consider how our prescribing mechanisms operate, and engage with service users and their carers to ensure that impacts are kept to a minimum.</p>
Disability (including carers of disabled people)		✓		<p>All service users with a disability could be affected by the proposal. This group will be disproportionately affected by the proposal, particularly service users with a physical or sensory disability.</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>The impacts on residents will be kept under review and we will consider how our prescribing mechanisms operate, and engage with service users and their</p>

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					carers to ensure that impacts are kept to a minimum.
Gender Reassignment					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.
Marriage and Civil Partnership					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.
Pregnancy and Maternity					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

**Appendix 8**

					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		✓		The majority of service users who have received a OT assessment in the last 12 months are Asian or Asian British, even though the service is not specifically aimed at people with an Asian or Asian British background.	<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>We will continue to monitor this characteristic if changes are made and look to fully engage with service users to ensure any negative impact is minimised.</p>
Religion or Belief					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.
		✓		If this proposal is accepted, all staff impacted are female	There would be full and early engagement with staff and trade unions, including a full consultation

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Sex					<p>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>								
Sexual orientation					<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><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?</p> <p>If yes, which Protected Characteristics could be affected and what is the potential impact?</p>					<table border="1"> <tr> <td data-bbox="1149 884 1473 940">Yes</td> <td data-bbox="1473 884 1632 940">✓</td> <td data-bbox="1632 884 1899 940">No</td> <td data-bbox="1899 884 2152 940"></td> </tr> <tr> <td colspan="4" data-bbox="1149 940 2152 1286"> <p><b>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.</b></p> <p><b>This service links with effective reablement of people with impairments. It also assists in preventing hospital admissions, and maintaining people in community settings.</b></p> </td> </tr> </table>	Yes	✓	No		<p><b>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.</b></p> <p><b>This service links with effective reablement of people with impairments. It also assists in preventing hospital admissions, and maintaining people in community settings.</b></p>			
Yes	✓	No											
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<p><b>9. Any Other Impact</b> – Considering what else is happening within the</p>					<table border="1"> <tr> <td data-bbox="1149 1286 1393 1326">Yes</td> <td data-bbox="1393 1286 1632 1326">x</td> <td data-bbox="1632 1286 1899 1326">No</td> <td data-bbox="1899 1286 2152 1326"></td> </tr> </table>	Yes	x	No					
Yes	x	No											

<p>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?</p> <p>If yes, what is the potential impact and how likely is it to happen?</p>	<p><b>The service also supports people also impacted by welfare reform, unemployment, low socio economic and health.</b></p>
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### 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
Sex, Age	Consultation with staff and trade unions, and review of redeployment options	Outcomes for the Staff concerned	Visva Sathasivam	
Age	Through codesign and co production, working with colleagues in other directorates to limit the impact these proposals have on the sector	On-going, engagement and coproduction	Visva Sathasivam	On going
Disability	Working closely with impacted service users and colleagues in other departments to assess and limit the impacts	On-going, engagement and coproduction	Visva Sathasivam	

### 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.

Further assessments are required to manage Equity in provisions with the constraints of the budget pressures to minimise risks

### 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?

**Appendix 8**

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)	