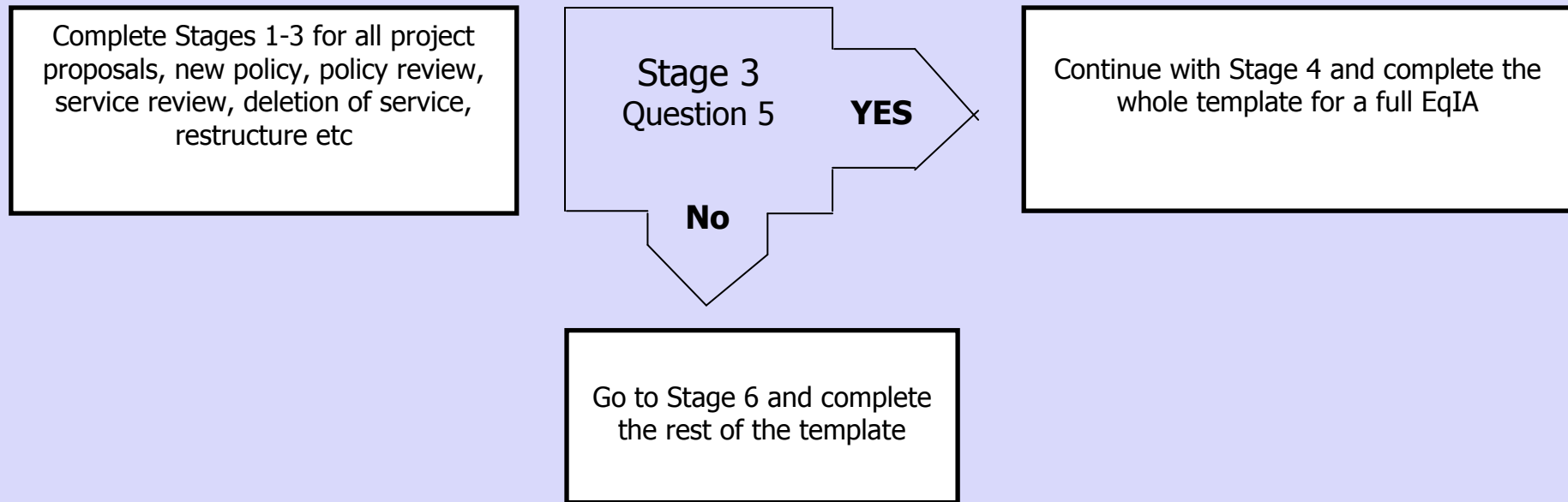


Equality Impact Assessment Template

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

Type of Decision: Tick ✓	✓	Cabinet		Portfolio Holder		Other (explain)	
Date decision to be taken:	27 th April 2017						
Value of savings to be made (if applicable):	£1m						
Title of Project:	Sancroft						
Reference:	PA_9						
Directorate / Service responsible:	People's Directorate / Adult Social Care						
Name and job title of Lead Officer:	Bernie Flaherty, Director of Adult's Social Services						
Name & contact details of the other persons involved in the assessment:	Chris Greenway – Head of Safeguarding Assurance and Quality Services						
Date of assessment (including review dates):	21 st March 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>Sancroft is a purpose built Residential Care Home and Day Centre facility with 50 single residential beds for elderly residents and two 25 place Day Centres which opened in 1999 in central Harrow.</p> <p>Sancroft is a 25 year Private Finance Initiative (Pathfinder) contract arrangement between LB Harrow and Catalyst Communities Housing Association (In 2006 the Association changed its name from Ealing Family Housing Association). The service commencement date was the 31st December 1999 and continues for a period of 25 years.</p> <p>Three day care services are provided at Sancroft. These include 'Byron' for older people with dementia, 'Anjali' and 'Maya' for older Asian people, Asian people with dementia and Asian people with learning disabilities. The day service block contract costs £525,025 (2015/16) including annual uplift (based on GDP deflator percentage change – currently 2.36%).</p> <p>Proposal: It is recommended that the Council embark on the creation of a Harrow Care Pathway Enterprise at Sancroft as a traded entity providing respite services as well as the residential and residential dementia care services currently provided at Sancroft.</p> <p>All day care places would be re-provided at Kenmore – with no cost impact of doing so.</p>						
<p>2. Who are the main people / Protected Characteristics</p>	<table border="1" style="width: 100%;"> <tr> <td>Residents / Service Users</td> <td>✓</td> <td>Partners</td> <td>✓</td> <td>Stakeholders</td> <td></td> </tr> </table>	Residents / Service Users	✓	Partners	✓	Stakeholders	
Residents / Service Users	✓	Partners	✓	Stakeholders			

that may be affected by your proposals? (✓ all that apply)	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 day to day management of Kenmore sits with Adult Social Care The Project is being managed as part of Project Phoenix Catalyst Communities Housing Association is the Council's Pfi Partner Freemantle Trust deliver the care services at Sancroft (sub-contract to Catalyst) Joint overall responsibility between the Council and Catalyst					

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)	<table border="1"> <tr> <td>18-64</td> <td>5.4%</td> </tr> <tr> <td>65-74</td> <td>13.5%</td> </tr> <tr> <td>75-84</td> <td>37.8%</td> </tr> <tr> <td>85+</td> <td>43.2%</td> </tr> <tr> <td>Total</td> <td>100.0%</td> </tr> </table>	18-64	5.4%	65-74	13.5%	75-84	37.8%	85+	43.2%	Total	100.0%	There may be limited impact on elderly day centre users who will be given Kenmore as an option to relocate to. However, the service will be re-provided like for like. Harrow has one of the highest proportions of older residents aged 65 and over (33,667 recorded in 2011 census), at 14.1%, ranking Harrow 5th in London. It is estimated that 17.2% of under 65s with long term support needs in the borough are likely to be self-funding, and 38.3% of older people. This equates to approximately 4,200 self-funders.
	18-64	5.4%										
65-74	13.5%											
75-84	37.8%											
85+	43.2%											
Total	100.0%											
Evidence from Frameworki Case Management System Published information – Census data												

Disability (including carers of disabled people)	All service users are registered disabled. Evidence from Frameworki Case Management System	Neutral Impact – the reduction of Older People Day Care Places at Sancroft will not adversely impact this protected characteristic over another group. The addition of new residential provision within Sancroft will have a positive impact for disabled adults in the Borough.
Gender Reassignment	None identified Evidence from Frameworki Case Management System	None of the users are identified as being gender reassigned Neutral Impact – the change in use at the centre will not impact people who have undergone gender reassignment disproportionately.
Marriage / Civil Partnership	Evidence from Frameworki Case Management System	Neutral Impact – the reduction of Older People Day Care Places will not adversely impact this protected characteristic over another group
Pregnancy and Maternity	Evidence from Frameworki Case Management System	Neutral Impact – the reduction of Older People Day Care Places will not adversely impact this protected characteristic over another group
Race	Evidence from Frameworki Case Management System	The majority of service users are from Asian background, there will be a limited negative impact on service users from an Asian background whose day care provision will move from Sancroft to Kenmore. However, the changes to the residential side may increase Asian specific residential provision within the Borough.

Asian or Asian British	Any other Asian background	8.1%
	Indian	50.0%
	Pakistani	1.4%
Asian or Asian British Total		59.5%
Black or Black British	Any other Black background	1.4%
	Caribbean	5.4%
Black or Black British Total		6.8%
Mixed background	Any other mixed background	1.4%
	White and Asian	1.4%
Mixed background Total		2.7%
Other Ethnic background	Any other ethnic group	1.4%
Other Ethnic background Total		1.4%
White or White British	Any other White background	2.7%
	English	23.0%
	Irish	4.1%
White or White British Total		29.7%
Grand Total		100.0%

Evidence from Frameworki Case Management System

Catholic	8.1%
Christian (all denominations)	25.7%
Hinduism	44.6%
Islam	5.4%
Not Stated	1.4%
Other Religion	2.7%
Sikh	2.7%
(blank)	9.5%

The majority of service users identified Hinduism as their religion and belief. Other service users included Islam, Sikh and Other religions. There may be some limited negative impacts for service users from these backgrounds as they will be required to relocate day centre provision. However, the changes to the residential side may increase the specific provision for people of these religious backgrounds within the Borough.

Religion and Belief

	Grand Total	100.0%							
Sex / Gender	<table border="1"> <tr> <td>Female</td> <td>82.4%</td> </tr> <tr> <td>Male</td> <td>17.6%</td> </tr> <tr> <td>Grand Total</td> <td>100.0%</td> </tr> </table>		Female	82.4%	Male	17.6%	Grand Total	100.0%	The majority of service users are Female, however the service is not specifically provided to either gender there is slightly more impact on female service users.
	Female	82.4%							
Male	17.6%								
Grand Total	100.0%								
Evidence from Frameworki Case Management System									
Sexual Orientation	Evidence from Frameworki Case Management System		Neutral Impact – It is not believed that the changes proposed will impact this protected characteristic over another group.						

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	✓	✓				✓	✓	✓	
No			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? 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
An informal consultation will be carried out with the service users at Sancroft, and those service users using the day centre will be assessed and supported through the move to Kenmore (or alternative day care provision)	There is no expected impacts on different groups/ protected characteristics	No actions are expected on the back of informal 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)		✓		The impact on older people will be minor – particularly those moving from Sancroft to other day centres within the Borough.	Service users and their families will be supported through the process to ensure individual negative impact is minimized as much as possible.
Disability (including carers of disabled)		✓		All service users impacted by the proposal have a disability, however the impact overall for disabled people is an increase in provision for people with a disability.	Service users and their families will be supported through the process to ensure individual negative impact is minimized as much as possible.

people)					
Gender Reassignment				Low / Neutral Impact	None required
Marriage and Civil Partnership				Low / Neutral Impact	None required
Pregnancy and Maternity				Low / Neutral Impact	None required
Race		✓		The majority of service users at Sancroft are of an Asian Background, as such there is a change to the provision of day care support specifically for this protected characteristic.	The majority of service users will be relocated to Kenmore day centre, meaning that their support will not change. However Service users and their families will be supported through the process to ensure individual negative impact is minimized as much as possible.
Religion or Belief		✓		The service provides Asian specific support which is likely to take account of certain religious backgrounds, there is a reduction in the number of specific support provided to this group, however the number of residential based places will increase.	The majority of service users will be relocated to Kenmore day centre, meaning that their support will not change. However Service users and their families will be supported through the process to ensure individual negative impact is minimized as much as possible.
Sex		✓		The majority of service users impacted by the proposal are female, however the service is not delivered specifically to female service users.	The majority of service users will be relocated to Kenmore day centre, meaning that their support will not change. However Service users and their families will be supported through the process to ensure individual negative impact is minimized as much as possible.

Sexual orientation				Low / Neutral Impact	None required
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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?	Yes	✓	No	
	This proposal is one of many proposals across the Council, included a number of proposals designed to alter the running of day care services in the Borough. With all changes in service there is a chance that particular groups/protected characteristics may be impacted.			

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?	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

Stage 7: Public Sector Equality Duty

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

This proposal is a slight change to the delivery of support, however the positive impacts outweigh the negative for the majority of users. Officers will work closely with the provider to ensure the PSED is met, particularly in terms of the relocation of the users to Kenmore (or other day facilities)

Stage 8: Recommendation

11. 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 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 listed in the Action Plan above.

✓

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 the EqIA Quality Assurance Group (if required)		Signature of DETG Chair	