



City of Westminster

## EQUALITY IMPACT ASSESSMENT TOOL

The council has a statutory duty to consider the impact of its decisions on age, disability, gender reassignment, pregnancy & maternity, race, religion or belief, sex (gender) and sexual orientation.

The Council also has a duty to foster good relations between different groups of people and to promote equality of opportunity.

Completing an EIA is the simplest way to demonstrate that the Council has considered the equality impacts of its decisions and it reduces the risk of legal challenge. EIAs should be carried out at the earliest stages of policy development or a service review, and then updated as the policy or review develops. EIAs must be undertaken when it is possible for the findings to inform the final decision. Keep all versions of your EIA. An EIA should be finalised once a final decision is taken.

When you should undertake an EIA:

- You are making changes that will affect front-line services
- You are reducing the budget of a service, which will affect front-line services
- You are changing the way services are funded and this may impact the quality of the service and who can access it
- You are making a decision that could have a different impact on different groups of people
- You are making staff redundant or changing their roles (particularly if it impacts on frontline services).
- EIAs also need to be undertaken on how a policy is implemented even if it has been developed by central government (for example cuts to grant funding).

Who should undertake the EIA:

- The person who is making the decision or advising the decision-maker

Guidance and tools for completing EIAs are available on the WIRE:

<https://officesharedservice.sharepoint.com/sites/intranet/wcc-comms/Pages/Equality-Impact-Assessments-.aspx>

An EIA e-learning module is available for all Westminster staff:

[www.learningpool.com/westminster/course/view.php?id=159](http://www.learningpool.com/westminster/course/view.php?id=159)

When you have completed an EIA, please send the final copy to [Equalities@westminster.gov.uk](mailto:Equalities@westminster.gov.uk)

**It is the responsibility of the service to complete an EIA to the required standard and the quality and completeness of EIAs will be monitored by EMT.**

**All EIAs for proposed changes to levels of service arising from budget proposals must be completed by 2 September 2016.**

Title
<p><b>8.1A : Children with Disabilities Short Breaks</b></p>
<p>What are you analysing?</p> <ul style="list-style-type: none"> <li>• What is the purpose of the policy/project/activity/strategy?</li> <li>• In what context will it operate?</li> <li>• Who is it intended to benefit?</li> <li>• What results are intended?</li> <li>• Why is it needed?</li> </ul>
<p>Since 2011, all local authorities have had a duty to provide short breaks for children with disabilities. This includes providing a range of services, options for direct payment as well publishing a short breaks statement which sets out the range of short breaks services available, the criteria by which eligibility for services will be assessed, and how the range of services is designed to meet the needs of families with disabled children in their area.</p> <p>In Westminster, approximately 450 children currently receive a short break across specialist, targeted and our universal offer. This includes children accessing directly commissioned services such as through the Westminster Society for People with Learning Disabilities, Caxton and Stowe youth provision as well as spot purchased youth organisation as well as spot purchased day services, overnight respite and direct payments.</p> <p>In 2016, a review of children with disability services was initiated to look holistically at current provision in order to ensure that our operating model aligned with our ongoing strategic intentions – with a particular focus on increasing access to universal services and increased personalisation. Other key drivers for the review included:</p> <ul style="list-style-type: none"> <li>• Timescales for contract cessation of current contracts and the need to have clear transition arrangements to support vulnerable families</li> <li>• Improved awareness and knowledge base of good practice models and the impact of these on outcomes and accessibility.</li> <li>• The need to promote effective and varied support mechanisms to enable families to remain together and avoid unnecessary escalation into accommodation</li> <li>• The need to deliver services that evidence value for money and improved outcomes for service users in the light of increased demand.</li> <li>• Need to measure service outcomes and performance of the service more accurately.</li> </ul> <p>The review has begun to identify opportunities for redesigning the service model which would focus on:</p> <ul style="list-style-type: none"> <li>- Improving the accessibility of our direct payment offer through the introduction of pre-paid cards</li> <li>- Improving advice and information to enable families to build resilience and social capital to enable them to access universal settings with more intensive support available for those children with the most complex needs.</li> <li>- Re-designing our directly commissioned service offer to focus on the delivery of a framework of services which could be accessed either directly or via a direct payment.</li> </ul>

Whilst the saving will result in some closures and remodelling of existing services, the expectation is that the redesigned offer will enable the impacts of this change to be mitigated through greater focus on enabling access to a broader range of settings and increasing personalisation and choice and focusing on supporting parents to access universal services. The new assessment processes which will accompany this will also improve the availability of services to under 5's and those with a wider range of support needs.

Details of the lead person completing the screening/EIA

(i) Full Name: Justine Roberts

(ii) Position: Head of Commissioning

(iii) Unit: Children's Services

(iii) Contact Details: [Justine.roberts@rbkc.gov.uk](mailto:Justine.roberts@rbkc.gov.uk)

Date sent to [Equalities@westminster.gov.uk](mailto:Equalities@westminster.gov.uk)

17<sup>th</sup> October 2016

Version number and date of update

Version 1.0 – 29/09/16

Version 2.0 – 17/10/16

## SECTION 1: Initial screening: Do you need to complete an Equality Impact Assessment (EIA)?

Not all proposals will require an EIA, this initial screening will help you decide if your project or policy requires a full EIA by looking at the potential impact on any equality groups.

1.1	Does the project, policy or proposal have the potential to disproportionately impact on any of the following groups? If so, is the impact positive or negative?			
	None	Positive	Negative	Not sure
Disabled people	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Particular ethnic groups	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Men or women (include impacts due to pregnancy/ maternity)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
People or particular sexual orientation/s	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
People who are proposing to undergo, are undergoing or have undergone a process or part of a process of gender reassignment	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
People on low incomes	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
People in particular age groups	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Groups with particular faiths and beliefs	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Are there any other groups that you think may be affected negatively or positively by this project, policy or proposal?		<input type="checkbox"/>	<b>No</b> <input checked="" type="checkbox"/>	
<b>If the answer is “negative” or “unclear” consider doing a full EIA</b>				
1.2	What do you think that the overall NEGATIVE impact on groups and communities will be?			

		None/ Minimal	Significant
		<input type="checkbox"/> None or minimal impact would be where there is no negative impact identified, or where there will be no change to the services for any groups.	<input checked="" type="checkbox"/> Significant impact would be where there is an impact is identified that has substantial impact on any groups.
<b>If the answer is “significant” consider doing a full EIA</b>			
<b>1.3</b>	<b>Using the screening information in questions 2.1 and 2.2, should a full EIA be carried out on the project, policy or proposal</b>		
	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>		
<b>1.4</b>	<b>How have you come to this decision?</b>		
	Whilst the revised model of support based on increased personalisation and increased access into universal settings will have positive impacts, the reduction in overall funding will inevitably have some impact on the availability of services, and in particular the services which young people with disabilities are currently accessing. It is important to consider how these impacts can be most appropriately mitigated to reduce the impact and transition to the new model.		

## EQUALITY IMPACT ASSESSMENT

### SECTION 2: BUILDING AN EVIDENCE BASE

<b>3.1</b>	<b>Build up a picture of who uses/will use your service or facility and identify who are likely to be impacted by the proposal</b>	
	<ul style="list-style-type: none"> <li><i>If you do not formally collect data about a particular group then use the results of local surveys or consultations, census data, national trends or anecdotal evidence (indicate where this is the case). Please attempt to complete all boxes.</i></li> <li><i>A baseline of data is <a href="#">available here</a></i></li> </ul>	
	How many people use the service currently? What is this as a % of Westminster’s population?	Approximately 450 children and their families will be impacted by this change. This is approximately 0.2% of the overall population or 1% of the under 19 population.
	Age	To be eligible for a short break, you must be under the age of 25 and therefore all those affected are children

		and young people.
	Disability	To be eligible for a short break, a child would have a disability.
	Gender	
	Race	
	Religion or belief	Data on particular faiths and beliefs is not available but based on previous service experience it is likely that service users will come from a range of backgrounds, including different faiths and beliefs.
	Sexual orientation	Data on sexual orientation is currently not available but it is unlikely that this proposal will impact either positively or negatively on this protected characteristic.
<b>2.2</b>	<b>Are there any equality groups that are overrepresented in the monitoring information relative to their size of the population?</b> <i>If so, this could indicate that the proposal may have a disproportionate impact on this group even if it is a universal service. Information about Westminster's population is on the Equalities page on the WIRE.</i>	
	By the nature of the service young people with disabilities are overrepresented relative to the size of the population.	
<b>2.3</b>	<b>Are there any equality groups that are underrepresented in the monitoring information relative to their size of the population?</b> <i>If so, this could indicate that the service may not be accessible to all groups or there may be some form of direct or indirect discrimination occurring.</i>	
	As above, the service is specifically targeted at children with disabilities and therefore these are the only groups represented.	

### SECTION 3: ASSESSING THE IMPACT

In order to be able to identify ways to mitigate any potential impact it is essential that we know what those potential impacts might be.

<b>3.1</b>	<p><b>Consultation Information</b> <i>This section should record the consultation activity undertaken in relation to this project, policy or proposal</i></p>
	<p>In the early stages of the review consultation activity has taken place with Parent Forum leads, parent/carers and stakeholders. This has included group discussions, 1:1, facilitated conversation and questionnaires. Feedback received from other boroughs and schools were also tested out to see if the themes were consistent.</p> <p>This consultation has identified that there is demand for a range of support services alongside supported inclusion with programmes aimed at development of skills as opposed to centralised services. Parents say they want more personalisation through a simple direct payment system. Critically, they want to ensure that they continue to be involved in the decision making process.</p> <p>The consultation to date has focused on the principles which should underpin our model. Ongoing dialogue and formal consultation will be required on individual service level decisions – particularly in terms of closure or reduction of specific services and this has been built into our commissioning timescales.</p>
<b>3.2</b>	<p><b>What might the potential impact on individuals or groups be?</b> <i>Consider disability, race, gender, sexual orientation, transgender, age, faith or belief and those on low incomes and other excluded individuals or groups</i></p>
	<p>The funding reductions will impact on the overall availability of directly commissioned services which will mean that children with disabilities eligible for a short break service will have to access these services in different ways. The objective of the review is that the shift in this model reflects the principles parents have identified as core priorities. However, this will inevitably lead to transitional issues to the new model and the availability and timing of the service offer will shift. This will need to be carefully managed to ensure that parents and young people are supported through this process to access the services that they need in line with our short break duty.</p>

## SECTION 4: REDUCING & MITIGATING IMPACT

As a result of what you have learned, what can you do to minimise the impact of the proposed changes on equality groups and other excluded / vulnerable groups, as outlined above?

<b>4.1</b>	<b>Where you have identified an impact, what can be done to reduce or mitigate the impact?</b> (Remember to think about the Council as a whole, another service area may already be providing services which can help to deal with any negative impact).													
	No negative impacts identified.													
<b>4.2</b>	<b>Now that you have considered the potential or actual effect on equality, what action are you taking?</b>													
	<table border="1"> <tr> <td data-bbox="252 707 355 864"><input type="checkbox"/></td> <td data-bbox="363 707 699 864">1. No major change (no impacts identified)</td> <td data-bbox="707 707 1509 864">Your analysis demonstrates that the policy is robust and the evidence shows no potential for discrimination and you have taken all appropriate steps to advance equality &amp; foster good relations between groups.</td> </tr> <tr> <td data-bbox="252 864 355 943"><input checked="" type="checkbox"/></td> <td data-bbox="363 864 699 943">2. Adjust the policy</td> <td data-bbox="707 864 1509 943">You will take steps to remove barriers or to better advance equality.</td> </tr> <tr> <td data-bbox="252 943 355 1061"><input type="checkbox"/></td> <td data-bbox="363 943 699 1061">3. Continue the policy (impacts identified)</td> <td data-bbox="707 943 1509 1061">You will adopt your proposal, despite any adverse effect provided you are satisfied that it does not unlawfully discriminate and it is justified.</td> </tr> <tr> <td data-bbox="252 1061 355 1142"><input type="checkbox"/></td> <td data-bbox="363 1061 699 1142">4. Stop and remove the policy</td> <td data-bbox="707 1061 1509 1142">There are adverse effects that are not justified and cannot be mitigated. The policy is unlawfully discriminating.</td> </tr> </table>		<input type="checkbox"/>	1. No major change (no impacts identified)	Your analysis demonstrates that the policy is robust and the evidence shows no potential for discrimination and you have taken all appropriate steps to advance equality & foster good relations between groups.	<input checked="" type="checkbox"/>	2. Adjust the policy	You will take steps to remove barriers or to better advance equality.	<input type="checkbox"/>	3. Continue the policy (impacts identified)	You will adopt your proposal, despite any adverse effect provided you are satisfied that it does not unlawfully discriminate and it is justified.	<input type="checkbox"/>	4. Stop and remove the policy	There are adverse effects that are not justified and cannot be mitigated. The policy is unlawfully discriminating.
<input type="checkbox"/>	1. No major change (no impacts identified)	Your analysis demonstrates that the policy is robust and the evidence shows no potential for discrimination and you have taken all appropriate steps to advance equality & foster good relations between groups.												
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<input type="checkbox"/>	4. Stop and remove the policy	There are adverse effects that are not justified and cannot be mitigated. The policy is unlawfully discriminating.												
<b>4.3</b>	<b>Please document the reasons for your decision</b>													
	<p>In broad terms whilst there are clear capacity implications from the reduction in spend on short break services, there are opportunities through a redesign of services to ensure that, in future, funding is used in a smarter way which is more closely based around parental preference and personalisation.</p> <p>It will be critical to ensure that parents and young people are involved throughout this process, particularly in terms of specific proposals for closure and or reduction.</p> <p>Additionally, we will need to build in a robust mobilisation plan which will ensure that there is sufficient time for children's needs to be carefully considered and planned for as they transition to the new service offer.</p>													

**SECTION 5: ACTION PLAN**

*This section is for actions related any of the 9 protected characteristic: Age, Disability, Gender, Gender reassignment; Pregnancy & maternity, Race, Sexual Orientation or Religion/Belief*

<p><b>5.1</b></p>	<p>Complete the action plan if you need to reduce or remove the negative impacts you have identified, take steps to foster good relations or fill data gaps.</p> <p><i>Please include the action required by your team/unit, groups affected, the intended outcome of your action, resources needed, a lead person responsible for undertaking the action (inc. their department and contact details), the completion date for the action, and the relevant RAG rating: R(ed) – action not initiated, A(mber) – action initiated and in progress, G(reen) – action complete.</i></p> <p><b>NB. Add any additional rows, if required.</b></p>
<p><b>N/A</b></p>	

**THIS SECTION TO BE COMPLETED BY THE RELEVANT SERVICE MANAGER**

**SIGNATURE:** .....

**FULL NAME:** Justine Roberts

**UNIT:** Children's Commissioning

**EMAIL & TELEPHONE EXT:** [Justine.roberts@rbkc.gov.uk](mailto:Justine.roberts@rbkc.gov.uk) / 07739317016

**DATE (DD/MM/YYYY):** 29/09/2016

**WHAT NEXT?**

**It is the responsibility of the service to complete an EIA to the required standard and the quality and completeness of EIAs will be monitored by EMT.**

**All EIAs for proposed changes to levels of service arising from budget proposals must be completed by 2 September 2016.**

**All completed EIAs should be sent to: [Equalities@westminster.gov.uk](mailto:Equalities@westminster.gov.uk)**