

Equality Impact Analysis to enable informed decisions

The purpose of this document is to:-

- I. help decision makers fulfil their duties under the Equality Act 2010 and
- II. for you to evidence the positive and adverse impacts of the proposed change on people with protected characteristics and ways to mitigate or eliminate any adverse impacts.

Using this form

This form must be updated and reviewed as your evidence on a proposal for a project/service change/policy/commissioning of a service or decommissioning of a service evolves taking into account any consultation feedback, significant changes to the proposals and data to support impacts of proposed changes. The key findings of the most up to date version of the Equality Impact Analysis must be explained in the report to the decision maker and the Equality Impact Analysis must be attached to the decision making report.

****Please make sure you read the information below so that you understand what is required under the Equality Act 2010****

Equality Act 2010

The Equality Act 2010 applies to both our workforce and our customers. Under the Equality Act 2010, decision makers are under a personal duty, to have due (that is proportionate) regard to the need to protect and promote the interests of persons with protected characteristics.

Protected characteristics

The protected characteristics under the Act are: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; sexual orientation.

Section 149 of the Equality Act 2010

Section 149 requires a public authority to have due regard to the need to:

- Eliminate discrimination, harassment, victimisation, and any other conduct that is prohibited by/or under the Act
- Advance equality of opportunity between persons who share relevant protected characteristics and persons who do not share those characteristics
- Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

The purpose of Section 149 is to get decision makers to consider the impact their decisions may or will have on those with protected characteristics and by evidencing the impacts on people with protected characteristics decision makers should be able to demonstrate 'due regard'.

Decision makers duty under the Act

Having had careful regard to the Equality Impact Analysis, and also the consultation responses, decision makers are under a personal duty to have due regard to the need to protect and promote the interests of persons with protected characteristics (see above) and to:-

- (i) consider and analyse how the decision is likely to affect those with protected characteristics, in practical terms,
- (ii) remove any unlawful discrimination, harassment, victimisation and other prohibited conduct,
- (iii) consider whether practical steps should be taken to mitigate or avoid any adverse consequences that the decision is likely to have, for persons with protected characteristics and, indeed, to consider whether the decision should not be taken at all, in the interests of persons with protected characteristics,
- (iv) consider whether steps should be taken to advance equality, foster good relations and generally promote the interests of persons with protected characteristics, either by varying the recommended decision or by taking some other decision.

Conducting an Impact Analysis

The Equality Impact Analysis is a process to identify the impact or likely impact a project, proposed service change, commissioning, decommissioning or policy will have on people with protected characteristics listed above. It should be considered at the beginning of the decision making process.

The Lead Officer responsibility

This is the person writing the report for the decision maker. It is the responsibility of the Lead Officer to make sure that the Equality Impact Analysis is robust and proportionate to the decision being taken.

Summary of findings

You must provide a clear and concise summary of the key findings of this Equality Impact Analysis in the decision making report and attach this Equality Impact Analysis to the report.

Impact – definition

An impact is an intentional or unintentional lasting consequence or significant change to people's lives brought about by an action or series of actions.

How much detail to include?

The Equality Impact Analysis should be proportionate to the impact of proposed change. In deciding this asking simple questions “Who might be affected by this decision?” “Which protected characteristics might be affected?” and “How might they be affected?” will help you consider the extent to which you already have evidence, information and data, and where there are gaps that you will need to explore. Ensure the source and date of any existing data is referenced.

You must consider both obvious and any less obvious impacts. Engaging with people with the protected characteristics will help you to identify less obvious impacts as these groups share their perspectives with you.

A given proposal may have a positive impact on one or more protected characteristics and have an adverse impact on others. You must capture these differences in this form to help decision makers to arrive at a view as to where the balance of advantage or disadvantage lies. If an adverse impact is unavoidable then it must be clearly justified and recorded as such, with an explanation as to why no steps can be taken to avoid the impact. Consequences must be included.

Proposals for more than one option If more than one option is being proposed you must ensure that the Equality Impact Analysis covers all options. Depending on the circumstances, it may be more appropriate to complete an Equality Impact Analysis for each option.

The information you provide in this form must be sufficient to allow the decision maker to fulfil their role as above. You must include the latest version of the Equality Impact Analysis with the report to the decision maker. Please be aware that the information in this form must be able to stand up to legal challenge.

Background Information

Title of the policy / project / service being considered	Recommissioning of LARC Provision (Long Acting Reversible Contraception)	Person / people completing analysis	Linda Turnbull and Carol Skye
Service Area	Public Health	Lead Officer	TBC
Who is the decision maker?	TBC	How was the Equality Impact Analysis undertaken?	Desktop exercise
Date of meeting when decision will be made	Click here to enter a date.	Version control	V0.1
Is this proposed change to an existing policy/service/project or is it new?	Existing policy/service/project	LCC directly delivered, commissioned, re-commissioned or de-commissioned?	Re-commissioned
Describe the proposed change	<p>Long Acting Reversible Contraception (LARC) services are currently commissioned by LCC to GP surgeries and through Lincolnshire Integrated Sexual Health Services (LISH). A review of LARC services has been completed and the recommendations are to recommission LARC in a similar way to which they are currently commissioned.</p> <hr/> <p>LARC is recognised as a safe and effective form of contraception. Once LARC devices are inserted a woman has a greatly reduced chance of becoming pregnant, especially as it lasts for a long period of time. Unlikely other forms of contraception, such as the contraception pill, implants and IUCD/IUSs do not rely on the user remembering to take the pill on a daily basis and is one of the reasons why it is considered to be one of the most effective forms of contraception.</p> <p>It remains an important element for females to manage their reproductive lifecycle and should be widely accessible to prevent unwanted pregnancies developing.</p> <hr/>		

Evidencing the impacts

In this section you will explain the difference that proposed changes are likely to make on people with protected characteristics. To help you do this first consider the impacts the proposed changes may have on people without protected characteristics before then considering the impacts the proposed changes may have on people with protected characteristics.

You must evidence here who will benefit and how they will benefit. If there are no benefits that you can identify please state 'No perceived benefit' under the relevant protected characteristic. You can add sub categories under the protected characteristics to make clear the impacts. For example under Age you may have considered the impact on 0-5 year olds or people aged 65 and over, under Race you may have considered Eastern European migrants, under Sex you may have considered specific impacts on men.

Data to support impacts of proposed changes

When considering the equality impact of a decision it is important to know who the people are that will be affected by any change.

Population data and the Joint Strategic Needs Assessment

The Lincolnshire Research Observatory (LRO) holds a range of population data by the protected characteristics. This can help put a decision into context. Visit the LRO website and its population theme page by following this link: <http://www.research-lincs.org.uk> If you cannot find what you are looking for, or need more information, please contact the LRO team. You will also find information about the Joint Strategic Needs Assessment on the LRO website.

Workforce profiles

You can obtain information by many of the protected characteristics for the Council's workforce and comparisons with the labour market on the [Council's website](#). As of 1st April 2015, managers can obtain workforce profile data by the protected characteristics for their specific areas using Agresso.

Positive impacts

The proposed change may have the following positive impacts on persons with protected characteristics – If no positive impact, please state 'no positive impact'.

Age	<p>The service is open to all women regardless of their age. There is no upper age on the service.</p> <p>Practitioners will follow Fraser guidelines when women aged under 16 request LARC services. Fraser guidelines specifically relate to contraception and sexual health services and giving treatment to those under 16 without parental consent.</p> <p>When women aged under 13 years of age request LARC provision, consideration will be given to the requirement for a referral to child protection services and Lincolnshire child protection policies and procedures will be followed as appropriate. This is to ensure safety and protection for all users. However this consideration does not necessarily mean that the user cannot receive LARC provision if deemed appropriate, as there is no lower age limit for Fraser Guidelines. When it comes to sexual health, those under 13 are not legally able to consent to any sexual activity, and therefore any information that such a person was sexually active would need to be acted upon to safeguard the young person.</p>
Disability	<p>The service is open to all females regardless of their disability.</p> <p>Unlikely other forms of contraception, such as the contraception pill, implants and IUCD/IUSs do not rely on the user remembering to take the pill on a daily basis and is one of the reasons why it is considered to be one of the most effective forms of contraception.</p> <p>We have no data on the disability of the users currently accessing the services. This is due to the service being confidential. The current provider of LARC services are GP surgeries and LISH, who will hold their own data on protected characteristics. Providers are likely to have their own internal policies and procedures to ensure that their services do not discriminate against any protected characteristics.</p> <p>The services are currently provided by GP surgeries and LISH. There are over 80 GP surgeries in Lincolnshire and nine LISH clinic sites ensuring that most people have one readily available in their local community and in places that should be easily accessible for disabled people.</p>
Gender reassignment	<p>The services are open to all users, regardless of their gender reassignment.</p> <p>We have no data on the gender reassignment of the users currently accessing the services. This is due to the service being confidential. The current provider of LARC services are GP surgeries and LISH, who will hold their own data on protected characteristics. Providers are likely to have their own internal policies and procedures to ensure that their services do not discriminate against any protected characteristics.</p>

Marriage and civil partnership	<p>The service is open to all women, regardless of their marriage or civil partnership status. Women are not asked to disclose their marriage or civil partnership status before access to the services.</p> <p>We have no data on the marriage or civil partnership status of the users currently accessing the services. This is due to the service being confidential. The current provider of LARC services are GP surgeries and LISH, who will hold their own data on protected characteristics. Providers are likely to have their own internal policies and procedures to ensure that their services do not discriminate against any protected characteristics.</p>
Pregnancy and maternity	<p>The service aims to offer women as much choice and flexibility in the contraception choices as possible. Following the recommissioning of the services LARC provision will likely be offered in a wide range of locations in Lincolnshire, including both these new contracts and also the current Lincolnshire Integrated Sexual Health Services (LISH) contract. In addition LISH is now offering clinics in the new Maternity Hubs. The service is working with the Maternity Transformation Team to improve access and support women who are either pregnant or postnatal, requiring advice on sexual and reproductive health. This means that women have maximum possible choice and flexibility in services that enable them to make informed choices about contraception services.</p>
Race	<p>The service is open to all females, regardless of their race.</p> <p>We have no data on the race of the users currently accessing the services. This is due to the service being confidential. The current provider of LARC services are GP surgeries and LISH, who will hold their own data on protected characteristics. Providers are likely to have their own internal policies and procedures to ensure that their services do not discriminate against any protected characteristics.</p>
Religion or belief	<p>The service is open to all females, regardless of their religion or belief.</p> <p>We have no data on the religion or belief of the users currently accessing the services. This is due to the service being confidential. The current provider of LARC services are GP surgeries and LISH, who will hold their own data on protected characteristics. Providers are likely to have their own internal policies and procedures to ensure that their services do not discriminate against any protected characteristics.</p> <p>As the service is currently available from both GP surgeries and also LISH, which offers clinics in nine locations in Lincolnshire, the re-tender aims to ensure a similar geographical coverage. This enables women to be able to access LARC services from a choice of locations including those which are currently not well known. For example, some women, due to their beliefs and culture, may not wish to access provision where they may be recognised and may prefer to use a service that is not within their immediate community.</p>

Sex	<p>LARC provision is not appropriate to be given to the male population. It is will be available for free for all females from a wide range of locations in Lincolnshire.</p> <p>Male contraception, condoms, are available for free from GPs and LISH and through the C-card scheme for young people aged 13-19. The C-card scheme provides free condoms and sexual health information to young people in youth groups, pharmacies, GP surgeries and other community settings such as some libraries.</p>
Sexual orientation	<p>The service is open to all females regardless of their sexual orientation.</p> <p>We have no data on the sexual orientation of the users currently accessing the services. This is due to the service being confidential. The current provider of LARC services are GP surgeries and LISH, who will hold their own data on protected characteristics. Providers are likely to have their own internal policies and procedures to ensure that their services do not discriminate against any protected characteristics.</p>

If you have identified positive impacts for other groups not specifically covered by the protected characteristics in the Equality Act 2010 you can include them here if it will help the decision maker to make an informed decision.

As Lincolnshire is a predominantly rural county with poor transport infrastructure the new service will enhance the LISH offer and provide accessibility across Lincolnshire. This aims to support lower income groups and those who have limited access to a car. The services are currently provided by GP surgeries and LISH. There are over 80 GP surgeries in Lincolnshire and nine LISH clinic sites ensuring that most people have one readily available in their local community and in places that should be easily accessible for disabled people

Adverse/negative impacts

You must evidence how people with protected characteristics will be adversely impacted and any proposed mitigation to reduce or eliminate adverse impacts. An adverse impact causes disadvantage or exclusion. If such an impact is identified please state how, as far as possible, it is justified; eliminated; minimised or counter balanced by other measures.

If there are no adverse impacts that you can identify please state 'No perceived adverse impact' under the relevant protected characteristic.

Negative impacts of the proposed change and practical steps to mitigate or avoid any adverse consequences on people with protected characteristics are detailed below. If you have not identified any mitigating action to reduce an adverse impact please state 'No mitigating action identified'.

Age	No perceived adverse impact.
Disability	No perceived adverse impact.
Gender reassignment	No perceived adverse impact.
Marriage and civil partnership	No perceived adverse impact.
Pregnancy and maternity	It is recommended to decommission pharmacy commissioned pregnancy testing services. Service levels for the service are very low. Barriers to young people accessing pregnancy testing in pharmacies have been explored by LCC Young Inspectors and they include embarrassment and lack of confidentiality, sometimes the right member of staff is unavailable and some pharmacies do not have toilets for the young person to use, which delays the process. As pregnancy tests are commonly available at a low cost of £1.00 each from many shopping outlets, most young people prefer to purchase their

	<p>own supply for reasons of convenience, accessibility, privacy and affordability. The original reason this service was introduced was due to a high number of young people seeking late abortions, however that trend has changed. Alternative free access to pregnancy testing is available via GP Practices and LISH services.</p> <p>It is not anticipated that the decommissioning of pharmacy based pregnancy testing services will have any impact on teenage pregnancy rates in Lincolnshire.</p>
Race	No perceived adverse impact.
Religion or belief	No perceived adverse impact.
Sex	No perceived adverse impact.
Sexual orientation	No perceived adverse impact.

If you have identified negative impacts for other groups not specifically covered by the protected characteristics under the Equality Act 2010 you can include them here if it will help the decision maker to make an informed decision.

Stakeholders

Stake holders are people or groups who may be directly affected (primary stakeholders) and indirectly affected (secondary stakeholders)

You must evidence here who you involved in gathering your evidence about benefits, adverse impacts and practical steps to mitigate or avoid any adverse consequences. You must be confident that any engagement was meaningful. The Community engagement team can help you to do this and you can contact them at consultation@lincolnshire.gov.uk

State clearly what (if any) consultation or engagement activity took place by stating who you involved when compiling this EIA under the protected characteristics. Include organisations you invited and organisations who attended, the date(s) they were involved and method of involvement i.e. Equality Impact Analysis workshop/email/telephone conversation/meeting/consultation. State clearly the objectives of the EIA consultation and findings from the EIA consultation under each of the protected characteristics. If you have not covered any of the protected characteristics please state the reasons why they were not consulted/engaged.

Objective(s) of the EIA consultation/engagement activity

This EIA was undertaken as a desktop exercise by Carol Skye and Linda Turnbull.

Limited data on the protected characteristics are available for the reasons outlines above.

It is not appropriate to undertake a consultation or engagement exercise with people accessing LARC services. The service is confidential and previous attempts to complete focus groups for sexual health services have been very difficult to complete. Mainly because of women reluctance to want to openly discuss these services.

Who was involved in the EIA consultation/engagement activity? Detail any findings identified by the protected characteristic

Age	N/A
Disability	N/A
Gender reassignment	N/A
Marriage and civil partnership	N/A
Pregnancy and maternity	N/A
Race	N/A
Religion or belief	N/A

Sex	N/A
Sexual orientation	N/A
Are you confident that everyone who should have been involved in producing this version of the Equality Impact Analysis has been involved in a meaningful way? The purpose is to make sure you have got the perspective of all the protected characteristics.	Yes
Once the changes have been implemented how will you undertake evaluation of the benefits and how effective the actions to reduce adverse impacts have been?	The impact and benefits of the service will be monitored through contract management processes.

Further Details

Are you handling personal data?	No If yes, please give details.
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Actions required	Action	Lead officer	Timescale
Include any actions identified in this analysis for on-going monitoring of impacts.	None		

Version	Description	Created/amended by	Date created/amended	Approved by	Date approved
0.1	First Draft	Linda Turnbull	17/10/2018	TBC	TBC

Examples of a Description:

'Version issued as part of procurement documentation'
 'Issued following discussion with community groups'
 'Issued following requirement for a service change; Issued following discussion with supplier'