

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	Review of Youth Housing Provision	Person / people completing analysis	Myfanwy Burrell/ Amy Allcock
Service Area	Children's Services	Lead Officer	Mark Rainey
Who is the decision maker?	Jo Kavanagh, Assistant Director of Children's Services	How was the Equality Impact Analysis undertaken?	Desktop exercise
Date of meeting when decision will be made	01/10/2019	Version control	V4
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>Lincolnshire County Council's Children's Services currently commissions a Youth Housing Service from the Lincolnshire Support Partnership, which ends on 30th June 2020. This service offers supported accommodation to young people aged 16-17 and Care Leavers up to age 21, who may be homeless or at risk of homelessness. In addition, Children's Services separately spot purchase Intense Needs Supported Accommodation (INSA) placements for young people who are usually rejected from the Youth Housing provision for failing to meet the criteria due to their intense level of needs.</p> <p>A review of the current Youth Housing services has been carried out within Children's Strategic Commissioning in order to determine what is required for a new Youth Housing Contract, which plans to encompass INSA placements through an increase to the intense needs support available within the Youth Housing Service.</p>		

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	The review considered how best the service can be delivered to maximise the benefits to the target cohort of 16-18 year olds (21 for Care Leavers.) The Youth Housing Service will place young people in this age category in supported accommodation when they are presented as homeless or at risk of homelessness. Young people will be considered equally regardless of age, providing they fall into this category. However, young people are supported and encouraged to move to appropriate 'Move-on Accommodation' by age 18 and 2 weeks. In exceptional circumstances, when all other options have been exhausted, young people can stay in the Service past 18 and 2 weeks, when no appropriate accommodation is available. This will be on a short-term basis until appropriate Move-on Accommodation is sourced.
Disability	Through an increase to the intense needs support that will be available within a new Youth Housing Service, young people with disabilities are more likely to have their needs met, as more support hours will be put into accommodating those with needs that cannot currently be met by the Youth Housing Service.
Gender reassignment	Neutral impact - In the event of gender reassignment being a need, the Key/Social Worker will be able to offer practical support in order to access suitable health information, where required. This will not impact on the individual's ability to access or remain in the Youth Housing provision.
Marriage and civil partnership	Neutral impact - The Youth Housing Service would not anticipate needing to meet the needs of married couples, but in the event a couple in a relationship/marriage/civil partnership under the age of 18 did present as requiring support, the same processes will be implemented.
Pregnancy and maternity	Neutral Impact - The review has considered the provision of housing for young people aged 16 to 18 (21 for Care Leavers), including pregnant and post-natal young women who require supported or other accommodation. The new Youth Housing Service will continue to accommodate pregnant females and/or parents; however the units will no longer be ring-fenced to specific needs in the Youth Housing Service going forward.
Race	Neutral impact – The Youth Housing Service is offered to young people of the appropriate age category who have presented as homeless or are at risk of homelessness, irrespective of race. Where a young person is presented as an Un-Accompanied Asylum Seeking Child, they will typically be placed through the UASC Closed Order List to be accommodated with young people of a similar race and culture. Therefore, the Youth Housing Provision will not anticipate needing to meet the needs of those who arrive in the country as an asylum seeker and require support.

Religion or belief	Neutral impact – A young person's individual or belief will not prevent them from accessing or remaining in the Youth Housing provision nor would a young person be discriminated on the grounds of their religion and/or beliefs.
Sex	Neutral impact – Young people who present to Youth Housing can be either male or female and no priority is given based upon sex. In addition, a young person's gender will not discriminate them from accessing the Youth Housing Service, regardless of whether they identify as male, female or another gender identity.
Sexual orientation	Neutral impact – Sexual orientation will not preclude young people from accessing or remaining in the Youth Housing provision and young people will be treated equally regardless of their orientation.

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.

Looked After Children (LAC) and Care Leavers – Within the remit of those eligible to receive supported accommodation are LAC and Care Leavers, both of which are vulnerable groups due to the situations they may have faced which resulted in them receiving LAC or Care Leaver status. These experiences can leave LAC and Care Leavers with complex emotional and mental health needs. Lincolnshire County Council has a duty to provide accommodation for LAC and Care Leavers, in line with statutory obligations. Ensuring appropriate supported accommodation is available for LAC and Care Leavers fulfils Lincolnshire County Council's statutory obligations by accommodating these vulnerable young people and, in turn, is the best way of providing access to education, health services and positive peer relationships.

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	Young people age 16-18 or up to 21 for Care Leavers will be accommodated equally when presenting as homeless or at risk of homelessness. Those nearing 18 or age 18 are encouraged and supported to find appropriate 'Move-on Accommodation' and therefore a slight adverse impact may be perceived in favour of those age 16/17 that require more long-term support, however young people (non-Care Leavers) are eligible to stay within the Youth Housing Service until they are aged 18 and 2 weeks and, in exceptional circumstances, can stay within the Service longer when no move-on accommodation can be immediately sourced.
Disability	No perceived adverse impact. Through an increase to the intense needs support available within a new Youth Housing Service, young people with disabilities are more likely to have their needs met, as more support hours will be put into accommodating those with needs that cannot currently be met by the Youth Housing Service.
Gender reassignment	No perceived adverse impact.
Marriage and civil partnership	No perceived adverse impact. The Youth Housing Service would not anticipate needing to meet the needs of married couples, but in the event a couple in a relationship/marriage/civil partnership under the age of 18 did present as requiring support, the same processes would be implemented.

Pregnancy and maternity	<p>No perceived adverse impact.</p> <p>The review has considered the provision of housing for young people aged 16 to 18 (21 for Care Leavers), including pregnant and post-natal young women who require supported or other accommodation. The new Youth Housing Service will continue to accommodate pregnant females and/or parents; however the units will no longer be ring-fenced to specific needs in the Youth Housing Service going forward.</p>
Race	<p>No perceived adverse impact.</p> <p>The Youth Housing Service is offered to young people of the appropriate age category who have presented as homeless or are at risk of homelessness, irrespective of race.</p>
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.

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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

To ascertain the impact, if any, on groups who may be affected by the potential remodelling of the Youth Housing Service.

From April to August 2019, a number of engagement events have taken place, centred around the proposed integrated model and seeking feedback on current service delivery and experiences. A wide range of stakeholders have participated including service users, suppliers from the marketplace (including the incumbent supplier), District Councils, Health colleagues, Lincolnshire Police, Mental Health services, Lincolnshire Leaving Care Service and education providers, as well as a number of internal stakeholders such as the Virtual School, Social Care and the Futures4Me service

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

Age	During one of the engagement events, stakeholders highlighted that this service will give young people in that age range (16-18 and up to 21 for care leavers) the opportunity to build strong relationships with their peers. The age range within the service was also discussed and one stakeholder suggested this could be extended to 24 years, however others felt the range of 16-24 may hinder the ability to manage those projects effectively, with a wider range of needs in the future.
Disability	With a higher level of funded being allocated to the new contract for this service, a wider range and complexity of needs will be met in the future, including those children and young people with disabilities.
Gender reassignment	
Marriage and civil partnership	
Pregnancy and maternity	The new service will no longer attach set support hours to beds and as such, there will be no beds specifically ring fenced for young parents or pregnant young people. However, this service will still deliver a service to this cohort of young people and they will still be able to access the support as they have done previously.
Race	
Religion or belief	

Sex	
Sexual orientation	
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.	An extensive programme of engagement events has taken place with all stakeholders to the service and their views have been fed into the Equality Impact Analysis document. The service review has been also governed by a project group internally, and the views of the Assistant Director, relevant service managers and Corporate Parenting Manager have also been included in this document.
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 Youth Housing Service, whether remodelled or not, will be subject to robust contract management with various measures designed to ascertain the benefits of the service and/or the effectiveness of any mitigating actions undertaken to reduce negative impacts.

Further Details

Are you handling personal data?

Yes

If yes, please give details.

Supported Accommodation providers require information on the young people referred to their service, which is captured on a referral form completed by the relevant Social/Key Worker. This is primarily the young person's name, date of birth, ethnicity, health needs, previous address and a personal background regarding the individual's needs and behaviour. This information is used to allow the Youth Housing Service to make a decision on whether they can accommodate the young person and whether they would be more suited to a general or complex level of support. Further details may be obtained through the placement when a Needs and Risk Assessment, Extension of Stay or other document containing personal details is completed.

In addition, the Youth Housing Service may share personal data with relevant services in order to facilitate access to education, employment, training or health care, as well as passing relevant information to Lincolnshire Leaving Care Service if the young person is eligible to receive support post-18.

Actions required

Include any actions identified in this analysis for on-going monitoring of impacts.

Action

Lead officer

Timescale

Version	Description	Created/amended by	Date created/amended	Approved by	Date approved

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