

# Equality Impact Assessment (EIA) Form

## 1. Service Area/Directorate

Name of Head of Service for activity being assessed: Tori Lynch

Directorate: Children and Young People

Name of lead person for this activity: Wendy Dyer

Individual(s) completing this assessment: Wendy Dyer

Date assessment completed: July 2024

## 2. What is being assessed

Activity being assessed (eg. policy, procedure, budget, service redesign, strategy etc.)

Accommodation based support service for children in care and care leavers (16-25 years) service redesign

What is the aim, purpose, or intended outcome of this activity?

To increase capacity of locally available accommodation with support for children in care and care leavers age 16-25 years.

Who will be affected by the development and implementation of this activity?

- |   |   |
|---|---|
| <input checked="" type="checkbox"/> Service users       | <input type="checkbox"/> Visitors to the county |
| <input checked="" type="checkbox"/> Communities         | <input type="checkbox"/> Carers                 |
| <input type="checkbox"/> Children                       | <input type="checkbox"/> Patients               |
| <input type="checkbox"/> All staff                      | <input type="checkbox"/> All part-time staff    |
| <input type="checkbox"/> Staff at a particular location | <input type="checkbox"/> Other:                 |

Is this:

- Review of an existing activity/policy
- New activity/policy
- Planning to withdraw or reduce a service, activity or presence?

## 3. Background information and findings

What information and evidence have you reviewed to help inform this assessment? (name your sources, eg. demographic information, usage data, Census data, feedback, complaints, audits, research)

Equality Act 2010 guidance published on Gov.UK website

Monitoring, financial and Key performance data related to the existing contract.

Data from Housing Solutions Team

Data from Children's Social Care

Herefordshire Council's 16/17 year old homelessness protocol and Joint Working Protocol for Care Leavers

**Summary of engagement or consultation undertaken** (eg. who you've engaged with, and how, or why do you believe this is not required)

Engagement is ongoing with key stakeholders including current provider to gain their view on development opportunities for the service. Engagement with young people who have experience of living in a supported accommodation settings is planned both in face-to-face meetings and via surveys. The key findings from the engagement and coproduction activities will inform the development of the service specification.

Key stakeholders within the children and young people directorate have been consulted with to review the potential impact and ensure all options and the impact have been given due consideration.

**Summary of relevant findings** (it is possible that you will have gaps in your evidence. You must decide whether you need to fill in the gaps now, and if it is feasible to do so. It might be that collecting robust information forms part of your action plan below)

The service is currently delivered from 8 properties owned by Herefordshire Council. One of these properties offering 5 homes for young people will continue to be used as part of this contract. 3 homes will not be used moving forward as the current contract has demonstrated the location of these is not suitable.

The Council has recently secured funding from the government to deliver a Single Homelessness Accommodation Programme (SHAP), the funding supports the Governments Rough Sleeping Strategy published in September 2022. SHAP funding can be utilised to provide supported accommodation for young people over the age of 18 who are at risk of or experiencing homelessness or rough sleeping including care experienced young people. This funding will allow the Council to purchase properties which will be used as a step down provision in the preparation for young people become ready in the future to live alone. It is proposed to use SHAP funding to deliver 10 additional properties for use under this contract, alongside the existing 5 homes currently used growing the service from 8 to 15 homes.

The Council's Sufficiency Strategy for Children and Young People 2023-2028 highlights the need to take multiple approaches to build capacity across all placements. Increasing the availability of local supported accommodation supports the council's commitment to its care leavers as Corporate Parent. There are options for accommodating care leavers and 16 and 17 year old children in care in Herefordshire however due to levels of demand for this type of accommodation a number of young people continue to be accommodated out of county which are often spot purchased placements at significant cost. When you factor in the likelihood that young people who live out of county grow roots in that area but may have to wait longer to be housed there is often an additional cost to the LA in supporting these young people for longer as a result. The provision of additional local accommodation with support will enable vulnerable young people to remain close to their local connections and provide a local, good quality and cost effective service. This is expected to improve outcomes for individual young people.

Young people living in this accommodation will be children in care and care leavers aged 16-25 who have, by the very virtue of being a looked after child, experienced trauma and adverse childhood experiences. Young people may also have multiple and have been exposed to high risk environmental factors (i.e groomed to exploit) which leads to vulnerabilities such as substance misuse, mental health needs, antisocial or challenging behaviour, offending history and vulnerability to criminal or sexual exploitation.

The service will operate a hub and spoke model to offer a flexible mixed economy of accommodation including supported accommodation staffed 24/7 and supported accommodation with outreach support. In addition to support the service will also provide housing management to promote the occupants' capacity to manage their own tenancies in the future. The service will also deliver floating support for 12 months for those young people who have secured move on into independent tenancies in the community to ensure any risk of future tenancy failure is mitigated against. The aim of this is to help support young people to sustain their tenancies wherever possible and reduce the number of young people who need to return to provision which offers higher level support for second and third chances. There is a careful balance to be had with providing the level of support and second chances, as we would to our own children, and enabling young people to take responsibility for unwise decisions. We recognise that care experienced young people need support for longer to feel confident and able to live alone. This model strengthens that opportunity by providing a stronger accommodation and support offer which will, in turn, reduce the number of our young people experiencing homelessness.

Opportunities for care leavers to develop and achieve improved outcomes will be enabled through a service that will work in partnership to develop and implement a personalised support plan for each person, identifying how they can manage their own needs, mitigate risks and take up opportunities. The aim is for young people to transition from the accommodation towards independent living within 2 years however this can be flexed if needed.

**4. The Public Sector Equality Duty**

Will this activity have a positive, neutral or negative impact on our duty to:

	Positive	Neutral	Negative
Eliminate unlawful discrimination, harassment, victimisation?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Advance equality of opportunity between different groups?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Foster good relations between different groups?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Explain your rationale here, and include any ways in which you could strengthen the capacity of this activity to promote equality (remember to add anything relevant into your action planning below)

The service will be commissioned using an outcome focused approach and providers will select their own delivery model .The support service will be procured via a single tender approaching the market in this way supports competitive tendering and provides opportunities for new partnerships to develop. The contracts will be as flexible as possible allowing for additional investment should it become available or for funding to be withdrawn if needs change.

The service will be delivered to a mix of young people with a variety of needs. Whilst each young person will have their own space, opportunity for group work in shared spaces forms part of the service provision. The main 24/7 staffed property includes indoor and outdoor recreational and shared space this provides opportunities for interactions between young people and external other agencies/ providers.

This service also supports the agreed priorities in Herefordshire’s health and wellbeing strategy, including mental health and wellbeing. This service is for vulnerable care leavers and it is expected the service will have a positive impact on young people particularly people with mental health needs.

Whilst each young person will have their own independent living area, there will be a shared front door to the property. It is possible that relationships between and behaviours of the young people living in the accommodation, or those they associate with within the property, may lead to cohesion issues. This will be mitigated by the provision of 24/7 support within the accommodation with support staff having access to the shared front door and communal areas. The support provider will work with the young people to address any issues that arise within the property, with neighbours or within the wider community.

**5. The impact of this activity**

Consider the potential impact of this activity on each of the equality groups outlined below and explain your rationale. Please note it is possible for the potential impact to be both positive and negative within the same equality group. Remember to consider the impact on staff and service users (current and potential) and partner organisations.

Equality Group	Potential <u>positive</u> impact	Potential <u>neutral</u> impact	Potential <u>negative</u> impact	Rationale
<b>Age</b> (include safeguarding, consent and child welfare)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>This service is to meet the specific needs of children in care and care leavers and will therefore have a positive impact on to 16 – 25 year olds within this cohort.</p> <p>The service also supports the delivery of the 16/17 year old homelessness protocol and Joint Housing Protocol for Care Leavers.</p>
<b>Disability</b> (consider attitudinal, physical, financial and social barriers, neuro-diversity, learning disability, physical and sensory impairment)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>Acceptance to the service will not be affected by disability status. However the service must be delivered in line with the Supported Accommodation Act 2023 and subsequent regulations, this means a child must not have their liberty restricted, or require help and support with personal care. Should a child need this level of care then an alternative provision would be sought such as a CQC registered placement.</p>
<b>Gender Reassignment</b> (include gender identity, and consider privacy of data and harassment)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>Acceptance to the service will not be affected by gender reassignment status.</p> <p>The provider will be required to set out how they intend to promote access for priority and hard-to-reach people along with providing training for staff on working with people with this and other protected characteristics</p>
<b>Marriage &amp; Civil Partnerships</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>Marital/civil partnership status will not affect acceptance to the service however the service is only able to offer single person accommodation. Should a young person be seeking to live with a partner then an alternative provision would be sought.</p>
<b>Pregnancy &amp; Maternity</b> (consider working arrangements, part-time working, infant caring responsibilities)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>Admission to the service will not be refused because the person is pregnant however in the 24/7 staffed element of the service young people will not be able to reside with their children.</p> <p>The 10 dispersed properties are intended for single people however should a young person give birth and alternative suitable accommodation has not been found they will be permitted to remain whilst a move on plan to suitable permanent accommodation is found.</p>
<b>Race</b> (including Travelling Communities and people of other nationalities)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>The service is open to people of all races and nationalities. The provider will be required to ensure that it has effective access to interpreting and translation services in order to</p>

Equality Group	Potential <u>positive</u> impact	Potential <u>neutral</u> impact	Potential <u>negative</u> impact	Rationale
				meet the communication needs of those whose first language is not English.
<b>Religion &amp; Belief</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Religious beliefs will not be a factor in determining acceptance for the service. The provider will be required to set out how they intend to promote opportunities for people to practice their faith along with providing training for staff on working with people with this and other protected characteristics
<b>Sex</b> (consider issues of safety and sexual violence, part-time work)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The sex of people will not affect whether they are accepted to the service.
<b>Sexual Orientation</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Sexual orientation will not be a factor in determining suitability for the service. The provider will be required to set out how they intend to promote opportunities for people along with providing training for staff on working with people with this and other protected characteristics
<b>Others: carers, care leavers, homeless, social/ economic deprivation</b> (consider shift-patterns, caring responsibilities)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>The service forms part of the council's approach to preventing and relieving homelessness and supports the council's commitment to its care leavers as Corporate Parent.</p> <p>The Supported Accommodation Act 2023 brought new national standards and regulations into law. The regulations include the Quality Standards which set out the outcomes that we expect supported accommodation providers to achieve, as well as the underpinning requirements that providers must meet.</p> <p>The service will focus on housing related support including development of independent living skills to help young people develop skills for adult living. This may include support with education and training, including opportunities such as apprenticeships; tools and/or resources to support their mental and physical health; employment, including job and interview skills; domestic skills such as cooking nutritious meals, budgeting and financial literacy.</p> <p>The provider shall ensure that it is sensitive to each person's needs and facilitate access to information in alternative formats as appropriate. The provider will ensure that</p>

Equality Group	Potential <u>positive</u> impact	Potential <u>neutral</u> impact	Potential <u>negative</u> impact	Rationale
				<p>written information about their services and how to obtain them is readily available.</p> <p>It will be a requirement that the service operates a Psychologically Informed Environments approach (PIE). PIE should be embedded in service delivery to enable staff to feel confident to collaborate from a strengths-based approach.</p> <p>The needs of each individual young person and therefore the support they require while living in supported accommodation will differ. The provider will be required to consider the individual needs of the young people they accommodate and ensure that the package of support that is put in place for them is consistent with meeting their individual needs.</p>
<p><b>Health Inequalities</b> (any preventable, unfair &amp; unjust differences in health status between groups, populations or individuals that arise from unequal distribution of social, environmental &amp; economic conditions)</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>The service will support vulnerable young people to access health services and work within the guidelines set out in the Making Every Contact Count.</p> <p>The provider will be required to understand the physical and mental health needs of young people and support them to access services where appropriate and/or necessary, such as working with young people to encourage them to attend appointments or supporting young people to put measures in place for them to manage their own medication responsibly.</p> <p>The provider will be required to ensure staff have the relevant skills and knowledge to be able to help young people understand, and where necessary work to support them to change negative behaviours in key areas of health and wellbeing such as, but not limited to: nutrition and healthy diet, exercise, mental health, sexual relationships, sexual health, contraception and use of psychoactive substances (legal highs), drugs, alcohol and tobacco.</p> <p>The supported accommodation regulations set out the provider should work to make the setting an environment that supports young people's physical, mental and emotional health, this approach enables the delivery of consistent and concise health and wellbeing information and encourages young people to engage in conversations about their health.</p>

Where a negative impact on any of the equality groups is realised after the implementation of the activity, the activity lead will seek to minimise the impact and carry out a full review of this EIA.

## 6. Action planning

What actions will you take as a result of this impact assessment? (you will need to include actions to mitigate any potential negative impacts)

Objective	What action will be taken	Who will lead	Timeframe
Child found not be eligible for the service due to supported accommodation regulations	An alternative provision would be sought such as a CQC registered placement	Home Finding team	Ongoing
Promoting access for priority and hard to reach people.	The provider will be required to set out how they intend to promote access for priority and hard-to-reach people along with providing training for providers on working with people with this protected characteristic	Commissioning	As part of tender/service specification

## 7. Monitoring and review

How will you monitor these actions?

As part of on-going contract monitoring process. Any changes in the delivery of the service that result in potentially negative impact on any equality group will be immediately raised with the provider by the commissioning lead.

When will you review this EIA?

The EIA will be reviewed as part of the contract mobilisation and implementation phase and revisited throughout the contract period.

The EIA will be formally reviewed in the event the services delivered are varied in any way.

## 8. Equality Statement

- All public bodies have a statutory duty under the Equality Act 2010 to give due regard to how they can improve society and promote equality in every aspect of their day-to-day business. This means that they must consider, and keep reviewing, how they are promoting equality in decision-making, policies, services, procurement, staff recruitment and management.
- Herefordshire Council will challenge discrimination, promote equality, respect human rights, and design and implement services, policies and measures that meet the diverse needs of our population, ensuring that none are placed at a disadvantage over others.

Signature of person completing EIA

Date signed



## **9. Make this EIA available**

- Attach your EIA as an appendix to any decision reports so that decision-makers have all the equality data they need in order to make robust and fair decisions.
- Staff, trade unions, service users or members of the public may want to see this EIA, so it must be published on our website along with the decision report.