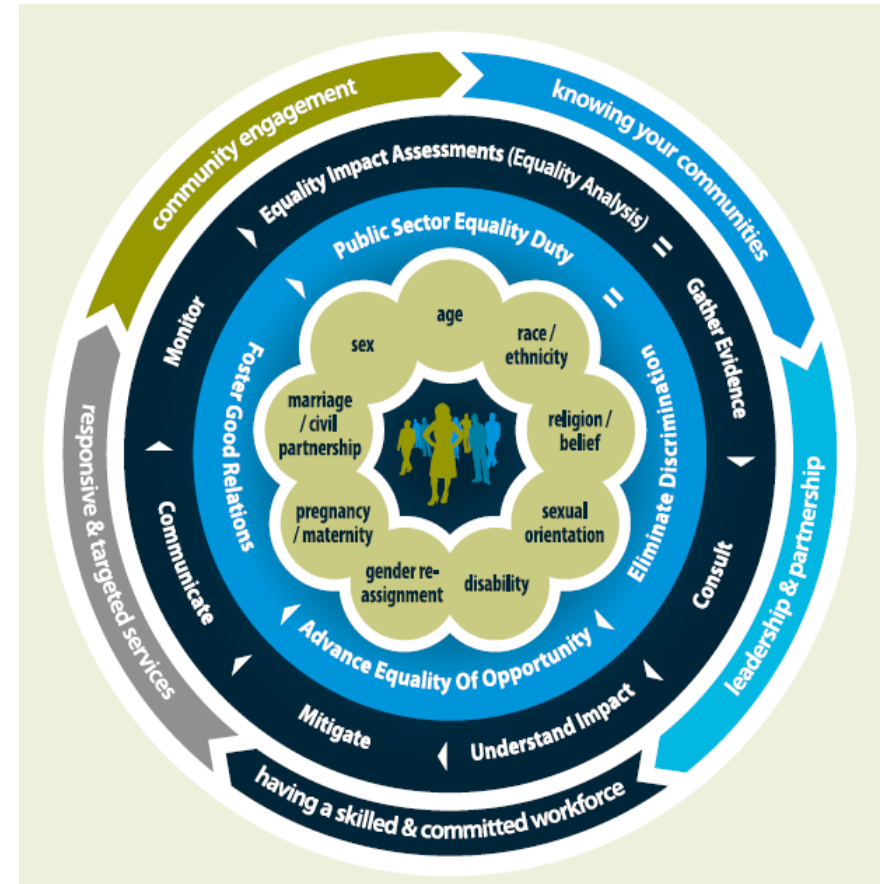


Equality Impact Assessment (EqIA) Template

EqIAs make services better for everyone and support value for money by getting services right first time.

EqIAs enable us to consider all the information about a service, policy or strategy from an equalities perspective and then create an action plan to get the best outcomes for staff and service-users¹. They analyse how all our work as a council might impact differently on different groups protected from discrimination by the Equality Act 2010². They help us make good decisions and evidence how we have reached them.³

An EqIA needs to be completed **as a project starts** to identify and consider possible differential impacts on people and their lives, inform project planning and, where appropriate, identify mitigating actions. It must be completed **before** any decisions are made or policy agreed so that the EqIA **informs that decision or policy**. It is also a live document; you should review and update it along with your project plan throughout.



Full guidance notes to help you are embedded in this form – see the End Notes or hover the mouse over the numbered notes. If your project/proposal relates primarily to staff – e.g. a restructure – there is a specific EqIA template for this [here](#)

Please share your initial EqlA with the equalities team, equalities@hertfordshire.gov.uk and the final/updated version at the end of the project. Key EqlAs should be reviewed by the relevant Head of Service. Examples of EqlAs can be seen in the [EqlA Library](#).

You should first consider whether you need to complete this full EqlA – the end-notes may help you and you can get advice from the Equalities Team. If you do not, you will need to document somewhere – e.g. in a report to departmental management board or Member Panel – your decision not to fully assess the impact on equality, including the reasons why you reached this decision.

If there is any potential for an impact on service users or staff, you should complete this full EqlA.

1. Who is completing the EqlA⁴ and why is it being done?

Title of service / proposal / project / strategy / procurement you are assessing⁵	Short Breaks (respite) consultation
Names of those involved in completing the EqlA	Vicky Swarbrick, Business Improvement Manager – ACS Business Improvement & Modernisation Team
Head of Service or Business Manager	Mark Harvey, Operations Director – Adults with Disabilities & Mental Health Services
Team/Department	Adult Disability Services (-ADS)
Lead officer contact details	Vicky.swarbrick@hertfordshire.gov.uk
Focus of EqlA – what are you assessing?⁶ What are the aims of the service, proposal, project? What outcomes do you want to achieve? What are the reasons for the proposal or change? Do you need to reference/consider any related projects?	<p>HCC Carer's Strategy 2018-21 (approved in June 2018) reaffirms the Council's commitment to working in partnership with carers, health and social care providers and other local organisations to support carers' wellbeing and help carers to carry on caring. In particular, objective 4 of the strategy makes a commitment to ensure that family carers are able to fully access their local community and to review the availability, quality and accessibility of respite provision. Our ambition is to develop new, more personalised and flexible options for carer's respite over the next three years, offering a more diverse, individually focussed range of options. This programme is called Respite for the Future.</p> <p>In addition, a wider review of respite provision is being undertaken which is seeking to ensure short-breaks booking services are as flexible, simple and personalised as possible and maximise the occupancy of services. It is also hoped that emergency respite care available to support crisis situations will be increased in the future.</p>

During winter 2018 ADS commissioning undertook a review of all residential respite services, in-house and externally provided, and found there is an overprovision of residential respite beds within Hertfordshire. As a result it is felt necessary to reduce the number of respite beds available across Hertfordshire,

The Council is consulting with the public about proposals to change short breaks (respite) services for adults with disabilities; this includes a proposal to close the in-house respite services at Hixberry Lane, Isabel Court and Tewin Road, subject to consultation with service users, family/carers and staff.

ADS commissioning held engagement events with service users and their family/carers in July 2019; feedback is being considered and suggestions have been made to improve the booking process and emergency support. A second round of consultation will now take place to gather more information on the areas identified above and the proposals made to allow decisions to be taken by the Council's Cabinet.

The purpose of this EQIA is to identify the characteristics of those impacted by the consultation proposals and how best to mitigate negative impacts identified (where possible).

Stakeholders

Who will be affected?
Which protected characteristics (*see end-notes 11-20*) is it most relevant to?
Consider the public, service users, partners, staff, Members, etc

Adults with disabilities and their carer(s)/families who currently access the following short breaks (respite) centres (or are eligible to access them in the future):

- Apton Road
- Hixberry Lane
- Isabel Court
- Scarborough House
- St Michael's House
- Tanners Wood
- Tewin Road
- The Meadows

The proposal would also impact on staff working in the centres listed above –

which will be considered by a separate consultation process.

Other key stakeholders include:

- Union
- Members
- ADS Commissioning
- Adult Disability Services and 0-25 Transition social work teams
- Short breaks providers
- Carers in Herts

NOTE: impacted individuals may have multiple protected characteristics but the mitigations outlined for each characteristic apply.

2. List of data sources used for this EqIA *(include relevant national/local data, research, monitoring information, service user feedback, complaints, audits, consultations, EqIAs from other projects or other local authorities, etc.)*

A range of useful local data on our communities can be found on [Herts Insight](#) and on the [Equalities Hub](#)

Title and brief description (of data, research or engagement – include hyperlinks if available)	Date	Gaps in data Consider any gaps you need to address and add any relevant actions to the action plan in Section 4.
Public Health England (2018) Local Authority Profiles, available at https://fingertips.phe.org.uk/profile/health-profiles	17.12.2018	
Public Health England (2018) Learning Disability Profiles, available at https://fingertips.phe.org.uk/profile/learning-disabilities/data#page/0/gid/1938132702/pat/6/par/E12000006/ati/102/are/E10000015	17.12.2018	
ONS (216) Sexual Identity, UK, available at https://www.ons.gov.uk/peoplepopulationandcommunity/culturalidentity/sexuality/bulletins/sexualidentityuk/2016	02.01.2019	

ONS (2018) Population Projections 2016-Based, available at https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections	17.12.2018	
Herts Insight (2017) https://www.hertfordshire.gov.uk/microsites/herts-insight/topics/population.aspx	02.01.2019	
Care Quality Commission Inspection Reports	11.04.2016 09.06.2016 17.02.2017 10.04.2017 25.04.2017 07.07.2017 20.11.2017 09.10.2018	CQC have updated their inspection of Apton Road, the report had not been published at the time of writing
ACSIS Adult Disability Services Management Information System Service Extract	19.08.2019	
SAP and Controcc Extracts on Short Stay Commitments including block contracts, spot contracts and in-house expenditure cost centres	30.11.2018	In-house data is exclusive of property and under the line costs
In-House Provider Occupancy Reports	April 2017- July 2019	
Jubilee House Provider Occupancy Report	10.01.2019	
CareTech Tewin Occupancy Report	-	Escalation to Commissioners gap in data
Adult Disability Services Family Consultation on Respite Consultation Data	20.08.2018	
HHCC HR data report - Staff equalities data for potentially impacted HCC staff	20.08.2018	Equalities data for centres run by external providers

3. Analysis and assessment: review of information, impact analysis and mitigating actions

Protected characteristic group	<p>What do you know⁷? What do people tell you⁸?</p> <p>Summary of data and feedback about service users and the wider community/ public</p> <ul style="list-style-type: none"> • Who uses the service? • Who doesn't and why? • Feedback/complaints? • Any differences in outcomes? Why? 	<p>What does this mean – what are the potential impacts of the proposal(s)⁹?</p> <p>- Consider positive and negative impacts - On service users / the public - <i>AND, where relevant, staff*</i></p> <p><i>* if your proposals relate mainly to a staff restructure or reorganisation, you should use the template here</i></p>	<p>What can you do¹⁰?</p> <p>What reasonable mitigations to reduce or avoid the impact can you propose?</p> <p>How will you communicate/engage or provide services differently to create a 'level playing field' – e.g. consultation materials in easy read or hold targeted engagement events</p> <p><i>If there is no current way of mitigating any negative impacts, clearly state that here and consider other actions you could take in the action plan in section 4.</i></p>
Age ¹¹	<p>The adults' short break (respite) service currently supports adults over the age of 18.</p> <p>In Aug 2019, the age breakdown of those with a short breaks allowance in their care plan is:</p> <p>18-64 years – 80% 65-74 years – 5% 75-84 years – 7% 85+ years - 7%</p> <p>Staff Age 25-59: 24 people (96%) Age 60+: 1 person (1%)</p>	<p><u>CONSULTATION</u> Whilst the majority of service users are aged 18-64 years, 19% are 65 years and over. Older people sometimes have more difficulty in using on-line services and may have more difficulty in reading small print. Some people may prefer to attend a face to face session rather than solely respond through a written questionnaire.</p> <p><u>PROPOSALS</u> <u>Service Users</u> Users of Hixberry Lane, Isabel Court & Tewin Road - Current service users, and their carers/families may find moving to another short breaks service or alternative form of provision difficult; there may be uncertainty about the quality or quantity of care in a new setting. They may feel 'emotionally attached' to their current unit and the staff that work there. They may be worried about 'age appropriate' provision being on offer in alternative settings.</p>	<p>Provide alternative ways to 'online responses' for people to feedback on consultation. Accessibility needs will be taken into account, eg. Ability to request large print. Engagement events to be spread over different times of day and locations to help accessibility and provide an opportunity to feedback face -to-face.</p> <p>Consultation to establish impacts on individuals that may not have been considered. Service users unable to use their current regular short breaks unit due to closure will be offered personalised, 1-2-1 support to find suitable alternative provision and to settle into to this. There is sufficient capacity within the remaining short breaks units to accommodate the numbers currently using the units we are proposing to close, and these remain spread throughout Hertfordshire. There may be travel implications –</p>

Protected characteristic group	<p>What do you know⁷? What do people tell you⁸?</p> <p>Summary of data and feedback about service users and the wider community/ public</p> <ul style="list-style-type: none"> • Who uses the service? • Who doesn't and why? • Feedback/complaints? • Any differences in outcomes? Why? 	<p>What does this mean – what are the potential impacts of the proposal(s)⁹?</p> <p>- Consider positive and negative impacts - On service users / the public - <i>AND, where relevant, staff*</i></p> <p><i>* if your proposals relate mainly to a staff restructure or reorganisation, you should use the template here</i></p>	<p>What can you do¹⁰?</p> <p>What reasonable mitigations to reduce or avoid the impact can you propose?</p> <p>How will you communicate/engage or provide services differently to create a 'level playing field' – e.g. consultation materials in easy read or hold targeted engagement events</p> <p><i>If there is no current way of mitigating any negative impacts, clearly state that here and consider other actions you could take in the action plan in section 4.</i></p>
		<p>Proposals may impact on ability of short breaks service users to have their preferred days for respite if the remaining units do not have enough capacity to accommodate new and existing requests.</p> <p>Increase in crisis support available – positive impact.</p> <p><u>Staff</u> Potential job losses from unit closures. 24 people (96%) of the staff who would be directly impacted by the proposed closures are aged 25-59. This compares to 80% of staff in the Short Breaks service as a whole who fall into that age group.</p>	<p>longer journey times and additional travel costs. The Adult Social Care travel policy will be applied to access eligibility for support with this.</p> <p>Review of booking process to ensure it is as fair as possible when accommodating individual preferences. It may still be the case that service users cannot have their first choice of short breaks days. Although this can also be the case currently.</p> <p>Hold a separate staff consultation on detailed proposed staffing changes and the implications (consulting both staff and Unions). Redeploy staff within the service where possible – there are likely to be opportunities for staff to move into current vacancies in the Supported Living and Short Breaks service. Any staff at risk of redundancy will be offered advice and support.</p>
<p>Disability¹²</p>	<p>Due to the nature of the service, everyone accessing the short breaks service has a disability.</p> <p>In August 2019, the primary</p>	<p><u>CONSULTATION</u> People with learning disabilities may need longer to respond to consultations and may require a range of alternative formats to be able to access the information.</p>	<p>10 week consultation period – this is considered the longest length possible which also allows for Councillors to make a decision on the proposals to meet business needs around service and</p>

Protected characteristic group	What do you know⁷? What do people tell you⁸? Summary of data and feedback about service users and the wider community/ public <ul style="list-style-type: none"> • Who uses the service? • Who doesn't and why? • Feedback/complaints? • Any differences in outcomes? Why? 	What does this mean – what are the potential impacts of the proposal(s)⁹? - Consider positive and negative impacts - On service users / the public - <i>AND, where relevant, staff*</i> <i>* if your proposals relate mainly to a staff restructure or reorganisation, you should use the template here</i>	What can you do¹⁰? What reasonable mitigations to reduce or avoid the impact can you propose? How will you communicate/engage or provide services differently to create a 'level playing field' – e.g. consultation materials in easy read or hold targeted engagement events <i>If there is no current way of mitigating any negative impacts, clearly state that here and consider other actions you could take in the action plan in section 4.</i>
	support reason for those with a short breaks allowance in their care plan is: Learning disability – 72% Physical disability – 21% Mental health (organic & functional) – 5 % Staff Disability – 3 people (12%) No disability – 20 people (80%) Unknown – 2 people (8%)	People with physical disabilities may have particular requirements in order to attend engagement events and/or complete questionnaires. <u>PROPOSALS</u> <u>Service users</u> Current service users, and their carers/families may find moving to another short breaks service or alternative form of provision difficult, particularly if they have quite complex/specific care needs; there may be uncertainty about the quality or quantity of care in a new setting. They may feel 'emotionally attached' to their	financial planning, and the minimise uncertainty for service users and the carers/families. Consultation to be available in a variety of formats, including 'easy-read', and public engagement events to be offered at a range of times and dates to allow people to feed back in person if preferable (and ensure buildings are disability accessible). Advocacy services notified and available to support people feedback their views. Every impacted service user (and their carer/families) would be offered a suitable alternative service that would meet their assessed needs. Service users unable to use their current regular short breaks unit due to closure will be offered personalised, 1-2-1 support to find suitable alternative provision and to settle into to this. There is sufficient capacity within the remaining short breaks units to

Protected characteristic group	What do you know⁷? What do people tell you⁸? Summary of data and feedback about service users and the wider community/ public <ul style="list-style-type: none"> • Who uses the service? • Who doesn't and why? • Feedback/complaints? • Any differences in outcomes? Why? 	What does this mean – what are the potential impacts of the proposal(s)⁹? - Consider positive and negative impacts - On service users / the public - <i>AND, where relevant, staff*</i> <i>* if your proposals relate mainly to a staff restructure or reorganisation, you should use the template here</i>	What can you do¹⁰? What reasonable mitigations to reduce or avoid the impact can you propose? How will you communicate/engage or provide services differently to create a 'level playing field' – e.g. consultation materials in easy read or hold targeted engagement events <i>If there is no current way of mitigating any negative impacts, clearly state that here and consider other actions you could take in the action plan in section 4.</i>
		<p>current unit and the staff that work there.</p> <p>Increase in crisis support available – positive impact.</p> <p><u>Staff</u> Potential job losses from closure of units. 3 people (12%) of the staff who would be directly impacted by the proposed changes have declared a disability. This compares to 5.5% of staff in the Short Breaks service as a whole (although the numbers are small).</p>	<p>accommodate the numbers currently using the units we are proposing to close, and these remain spread throughout Hertfordshire. There may be travel implications – longer journey times and additional travel costs.</p> <p>People will be informed as early as possible about any changes affecting them, to give as much time as possible to address fears/concerns and plan. This will need to be balanced with minimising how long there is uncertainty for directly impacted service users and their carers/families.</p> <p>Current consultation to be available in a variety of formats and offer a variety of ways of feedback. Inform Unions so that they can help support staff to engage in the public consultation.</p> <p>Ensure that the separate staff consultation on detailed proposed staffing changes is accessible to all staff impacted, making reasonable adjustments as required to allow everyone to feedback in a meaningful way. Redeploy staff within the service where possible.</p> <p>For staff at risk of redundancy, have 1-2-1</p>

Protected characteristic group	<p>What do you know⁷? What do people tell you⁸?</p> <p>Summary of data and feedback about service users and the wider community/ public</p> <ul style="list-style-type: none"> • Who uses the service? • Who doesn't and why? • Feedback/complaints? • Any differences in outcomes? Why? 	<p>What does this mean – what are the potential impacts of the proposal(s)⁹?</p> <p>- Consider positive and negative impacts - On service users / the public - <i>AND, where relevant, staff*</i></p> <p><i>* if your proposals relate mainly to a staff restructure or reorganisation, you should use the template here</i></p>	<p>What can you do¹⁰?</p> <p>What reasonable mitigations to reduce or avoid the impact can you propose?</p> <p>How will you communicate/engage or provide services differently to create a 'level playing field' – e.g. consultation materials in easy read or hold targeted engagement events</p> <p><i>If there is no current way of mitigating any negative impacts, clearly state that here and consider other actions you could take in the action plan in section 4.</i></p>
			<p>discussions to understand individual requirements that need to be taken into consideration in redundancy or redeployment situations.</p>
<p>Gender reassignment¹³</p>	<p>Information is not known on this issue as the information is not routinely collected and reported on. According to Herts Insights there is no publicly available data from which to make reliable estimates.</p> <p>Best assumptions provided by Herts Insights are that there are 182 transgender people in the County. Given that 75% of people accessing the service have a learning disability, and 2% of a given population may have a learning disability, this would equate to 3 people or 1% of the population accessing respite may be transgender.</p>	<p>It is not anticipated at this stage that the proposal will disproportionality affect people because of the issues of Gender reassignment but the position will be monitored if the proposal proceeds.</p>	<p>The current service model should provide for a level of personalisation to be able to meet general needs of the transgender population. However, this gap needs to be specifically addressed in future specifications.</p> <p>Every impacted service user (and their carer/families) would be offered a suitable alternative service that would meet their assessed needs.</p> <p>The Council will continue to monitor the position and if any issues in respect of this protected characteristic are identified by the Council then the Action Plan will be updated.</p>

Protected characteristic group	<p>What do you know⁷? What do people tell you⁸?</p> <p>Summary of data and feedback about service users and the wider community/ public</p> <ul style="list-style-type: none"> • Who uses the service? • Who doesn't and why? • Feedback/complaints? • Any differences in outcomes? Why? 	<p>What does this mean – what are the potential impacts of the proposal(s)⁹?</p> <p>- Consider positive and negative impacts - On service users / the public - <i>AND, where relevant, staff*</i></p> <p><i>* if your proposals relate mainly to a staff restructure or reorganisation, you should use the template here</i></p>	<p>What can you do¹⁰?</p> <p>What reasonable mitigations to reduce or avoid the impact can you propose?</p> <p>How will you communicate/engage or provide services differently to create a 'level playing field' – e.g. consultation materials in easy read or hold targeted engagement events</p> <p><i>If there is no current way of mitigating any negative impacts, clearly state that here and consider other actions you could take in the action plan in section 4.</i></p>
<p>Pregnancy and maternity¹⁴</p>	<p>Information is not known on this issue. The current service model does not provide specialist support for pregnancy and maternity.</p> <p>Information is not known on this issue for staff impacted.</p>	<p>It is not anticipated at this stage that the proposal will disproportionality affect people because of the issues of pregnancy and maternity but the position will be monitored if the proposal proceeds.</p>	<p>Ensure that requirements relating to this are discussed with any individuals and their carers/families when supporting a move to alternative provision.</p> <p>Every impacted service user (and their carer/families) would be offered a suitable alternative service that would meet their assessed needs.</p> <p>The Council will continue to monitor the position and if any issues in respect of this protected characteristic are identified by the Council then the Action Plan will be updated.</p> <p>Ensure that requirements relating to this are discussed with any staff as part of the separate staff consultation, and staff informed of where they can access advice and support.</p>
<p>Race¹⁵</p>	<p>Service users BAME – 9% White – 90% Unknown – 0.5% Prefer not to say – 0.5%</p> <p>As reported by Herts Insight, at the time of the 2011 census, the</p>	<p><u>CONSULTATION</u> There is a possibility that for some people using the service (and/or their carers and families) English is not their first language, or they may have limited English.</p> <p><u>PROPOSALS</u></p>	<p>Ensure translation or interpreting options are available on request in order to engage with the consultation process.</p>

Protected characteristic group	What do you know⁷? What do people tell you⁸? Summary of data and feedback about service users and the wider community/ public <ul style="list-style-type: none"> • Who uses the service? • Who doesn't and why? • Feedback/complaints? • Any differences in outcomes? Why? 	What does this mean – what are the potential impacts of the proposal(s)⁹? - Consider positive and negative impacts - On service users / the public - <i>AND, where relevant, staff*</i> <i>* if your proposals relate mainly to a staff restructure or reorganisation, you should use the template here</i>	What can you do¹⁰? What reasonable mitigations to reduce or avoid the impact can you propose? How will you communicate/engage or provide services differently to create a 'level playing field' – e.g. consultation materials in easy read or hold targeted engagement events <i>If there is no current way of mitigating any negative impacts, clearly state that here and consider other actions you could take in the action plan in section 4.</i>
	<p>largest ethnic group in Hertfordshire is White (English/Welsh/Scottish/Northern Irish/British) which accounts for 80.82%, 19.1% of the general Hertfordshire population were from a minority ethnic group (non-White). This compares with the population of people accessing respite, who were 90% White (English/Welsh/Scottish/Northern Irish/British).</p> <p>Staff BAME – 11 people (44%) White – 14 people (56%)</p> <p>A higher percentage of staff on lower grades in the Short Breaks service are BAME.</p>	<p>Service users It is not anticipated at this stage that the proposal will disproportionality affect people because of the issues of race but the position will be monitored if the proposal proceeds.</p> <p>Staff Potential job losses due to unit closures – 11 people (44%) of the potentially impacted staff are BAME. This compares to (35%) of staff in the Short Breaks service as a whole. This may be in part due to the location of the units proposed to close. It may also be in part because the proposals would have a greater impact on staff on lower grades, and a higher percentage of staff on lower grades in the Short Breaks service are BAME compared</p>	<p>The current service model should provide for a level of personalisation to be able to meet general needs of different races.</p> <p>Ensure that cultural/racially specific support requirements are considered when supporting individuals to move to a new an alternative provision.</p> <p>The Council will continue to monitor the position and if any issues in respect of this protected characteristic are identified by the Council then the Action Plan will be updated.</p> <p>Ensure translation or interpreting options are available on request in order to engage with the consultation process.</p> <p>Ensure that requirements relating to this are discussed with any staff as part of the separate staff consultation, and staff informed of where they can access advice and support.</p>

Protected characteristic group	<p>What do you know⁷? What do people tell you⁸?</p> <p>Summary of data and feedback about service users and the wider community/ public</p> <ul style="list-style-type: none"> • Who uses the service? • Who doesn't and why? • Feedback/complaints? • Any differences in outcomes? Why? 	<p>What does this mean – what are the potential impacts of the proposal(s)⁹?</p> <p>- Consider positive and negative impacts - On service users / the public - <i>AND, where relevant, staff*</i></p> <p><i>* if your proposals relate mainly to a staff restructure or reorganisation, you should use the template here</i></p>	<p>What can you do¹⁰?</p> <p>What reasonable mitigations to reduce or avoid the impact can you propose?</p> <p>How will you communicate/engage or provide services differently to create a 'level playing field' – e.g. consultation materials in easy read or hold targeted engagement events</p> <p><i>If there is no current way of mitigating any negative impacts, clearly state that here and consider other actions you could take in the action plan in section 4.</i></p>
		<p>to the higher grades.</p> <p>There is a possibility that English is not a first language, or may be limited, for some staff affected,</p>	
<p>Religion or belief¹⁶</p>	<p>In Aug 2019, the religion/belief of those with a short breaks allowance in their care plan is:</p> <p>Christian – 35% Other – 8% None – 1% Unknown – 47%</p> <p>Staff Christian - 14 people (56%) Other religion - 4 people (16%) None – 2 people (8%) Unknown – 5 people (20%)</p>	<p><u>CONSULTATION</u> Those impacted have a mixture of religions and beliefs.</p> <p><u>PROPOSALS</u> Service users It is not anticipated at this stage that the proposal will disproportionality affect people on the basis of religion/beliefs but the position will be monitored if the proposal proceeds.</p> <p>However the data does indicate service users have a mix of religions/beliefs. Someone may need to access (or avoid) short breaks provision on particular days/ times in order to allow them, or their</p>	<p>Awareness of key religious festivals to ensure that consultations engagement events allow everyone to participate. Offer a range of engagement options that allow people to engage at different times/days of the week to avoid conflict with religious events.</p> <p>Ensure that specific support requirements relating to religion/beliefs are considered when supporting individuals to move to a new an alternative provision.</p> <p>Every impacted service user (and their carer/families) would be offered a suitable alternative service that would meet their assessed needs.</p>

Protected characteristic group	<p>What do you know⁷? What do people tell you⁸?</p> <p>Summary of data and feedback about service users and the wider community/ public</p> <ul style="list-style-type: none"> • Who uses the service? • Who doesn't and why? • Feedback/complaints? • Any differences in outcomes? Why? 	<p>What does this mean – what are the potential impacts of the proposal(s)⁹?</p> <ul style="list-style-type: none"> - Consider positive and negative impacts - On service users / the public - <i>AND, where relevant, staff*</i> <p><i>* if your proposals relate mainly to a staff restructure or reorganisation, you should use the template here</i></p>	<p>What can you do¹⁰?</p> <p>What reasonable mitigations to reduce or avoid the impact can you propose?</p> <p>How will you communicate/engage or provide services differently to create a 'level playing field' – e.g. consultation materials in easy read or hold targeted engagement events</p> <p><i>If there is no current way of mitigating any negative impacts, clearly state that here and consider other actions you could take in the action plan in section 4.</i></p>
		<p>carers/families, to undertake religious practices. The proposals will not change how much respite someone is eligible for, but there is a risk that if someone needed to move to alternative provision that they may not be able to access it at the same day/times.</p> <p>Staff Those impacted have a mixture of religions and beliefs.</p>	<p>Staff consultation planning should include an awareness of key religious festivals to ensure that consultations engagement events allow everyone to participate. Offer a range of engagement options that allow people to engage at different times/days of the week to avoid conflict with religious events.</p>
<p>Sex/Gender¹⁷</p>	<p>In Aug 2019, the sex/gender of those with a short breaks allowance in their care plan is:</p> <p>Male – 55% Female – 45%</p> <p>This compares to Hertfordshire as a whole have 51% female and 49% male.</p> <p>Staff Male – 10 people (40%) Female – 15 people (60%)</p>	<p>The proposed changes would affect more men than women, although this appears to be because men are over represented in the current service (when compared to Hertfordshire demographics as a whole).</p> <p>Staff 60% (15 people) of the directly affected staff are female, compared to 40% (10 people) who are male. This compares to 75% of the Short Breaks service overall being female.</p>	<p>All of the remaining respite units offer services to both men and women. Ensure that specific support requirements relating to sex/gender are considered when supporting individuals to move to a new an alternative provision.</p> <p>For staff at risk of redundancy, have 1-2-1 discussions to understand individual requirements that need to be taken into consideration in redundancy or redeployment situations.</p>

Protected characteristic group	What do you know⁷? What do people tell you⁸? Summary of data and feedback about service users and the wider community/ public <ul style="list-style-type: none"> • Who uses the service? • Who doesn't and why? • Feedback/complaints? • Any differences in outcomes? Why? 	What does this mean – what are the potential impacts of the proposal(s)⁹? - Consider positive and negative impacts - On service users / the public - <i>AND, where relevant, staff*</i> <i>* if your proposals relate mainly to a staff restructure or reorganisation, you should use the template here</i>	What can you do¹⁰? What reasonable mitigations to reduce or avoid the impact can you propose? How will you communicate/engage or provide services differently to create a 'level playing field' – e.g. consultation materials in easy read or hold targeted engagement events <i>If there is no current way of mitigating any negative impacts, clearly state that here and consider other actions you could take in the action plan in section 4.</i>
Sexual orientation¹⁸	Service users In Aug 2019, 97.5% of those with a care plan containing an allowance for short breaks support had no sexual orientation recorded. % were recorded as heterosexual, and 0.2% preferred not to say. Staff Heterosexual – 15 people (60%) Unknown – 10 people (40%)	It is not anticipated at this stage that the consultation or proposals will disproportionality affect people because of the issues of sexual orientation but the position will be monitored if the proposal proceeds. Give the high percentage of 'unknown' for this category, it would be best to process on the assumption that those impacted have a mix of sexual orientations.	All communications/engagement/consultation activity to be inclusive. The current service model should provide for a level of personalisation to be able to meet general needs of different sexual orientations. Ensure that sexual orientation specific support requirements are considered when supporting individuals to move to a new an alternative provision.
Marriage and civil partnership¹⁹	Service users In Aug 2019, those with a care plan containing an allowance for short breaks had the following recorded: Single – 24% Married – 5% Widowed – 2% Divorced/separated – 1% Co-habiting – 1% Unknown – 66% Information is not known on this	It is not anticipated at this stage that the proposal will disproportionality affect people because of the issues of marriage & civil partnership but the position will be monitored if the proposal proceeds.	All communications/engagement/consultation activity to be inclusive. The current service model should provide for a level of personalisation to be able to meet general needs of different sexual orientations. Ensure that marriage and civil partnership specific support requirements are considered when supporting individuals to move to a new an alternative provision. Ensure that marriage and civil partnership specific support requirements are considered

Protected characteristic group	<p>What do you know⁷? What do people tell you⁸?</p> <p>Summary of data and feedback about service users and the wider community/ public</p> <ul style="list-style-type: none"> • Who uses the service? • Who doesn't and why? • Feedback/complaints? • Any differences in outcomes? Why? 	<p>What does this mean – what are the potential impacts of the proposal(s)⁹?</p> <p>- Consider positive and negative impacts - On service users / the public - <i>AND, where relevant, staff*</i></p> <p><i>* if your proposals relate mainly to a staff restructure or reorganisation, you should use the template here</i></p>	<p>What can you do¹⁰?</p> <p>What reasonable mitigations to reduce or avoid the impact can you propose?</p> <p>How will you communicate/engage or provide services differently to create a 'level playing field' – e.g. consultation materials in easy read or hold targeted engagement events</p> <p><i>If there is no current way of mitigating any negative impacts, clearly state that here and consider other actions you could take in the action plan in section 4.</i></p>
	issue for staff impacted.		when consulting staff and during any resulting redundancy or redeployment processes.
Carers²⁰	<p>Because of the nature of the service, all service users attending short breaks support will have a carer(s). Some service users may also have caring responsibilities.</p> <p>Where we have demographic data for the carers of those who currently have an allowance for short break (respite) support in their care plan, it indicates (as of Aug 2019):</p> <ul style="list-style-type: none"> • 36% (143 people) are aged 65 years and over. 0.2% are aged under 20 years. • 76% (295 people) are female. • 9% are BAME • 92% are main carers. 8% 	<p><u>CONSULTATION</u></p> <p>It may be more difficult for carers to have the time to feedback on the consultation, and/or attend engagement meetings due to caring responsibilities. They may require more notice to be able to attend events to allow them to make alternative care arrangements if required. Older carers may be less comfortable completing an online response to the consultation.</p> <p><u>PROPOSALS</u></p> <p>Carers may be worried by the need to change short break (respite) routines and have this provided from an alternative setting. There is a risk that they are unable to secure the same days for respite support from a new setting, and this may impact on what they are able to use</p>	<p>Consultation to last at least 10 weeks to maximise time for responses (whilst also meeting Council decision making timescales). Ensure notice is given of public weeks as far in advance as possible, and spread these through the consultation period. Offer a variety of channels for consultation responses, including hardcopy and online (that can be completed around caring responsibilities). Engage voluntary and community groups who provide support for carers, including Carers in Herts to help promote the consultation and support with responses.</p> <p>Every impacted service user (and their carer/families) would be offered a suitable alternative service that would meet their assessed needs. Service users unable to use their current regular short breaks unit due to closure will be offered personalised, 1-2-1 support to find suitable alternative provision and</p>

Protected characteristic group	What do you know⁷? What do people tell you⁸? Summary of data and feedback about service users and the wider community/ public <ul style="list-style-type: none"> • Who uses the service? • Who doesn't and why? • Feedback/complaints? • Any differences in outcomes? Why? 	What does this mean – what are the potential impacts of the proposal(s)⁹? - Consider positive and negative impacts - On service users / the public - <i>AND, where relevant, staff*</i> <i>* if your proposals relate mainly to a staff restructure or reorganisation, you should use the template here</i>	What can you do¹⁰? What reasonable mitigations to reduce or avoid the impact can you propose? How will you communicate/engage or provide services differently to create a 'level playing field' – e.g. consultation materials in easy read or hold targeted engagement events <i>If there is no current way of mitigating any negative impacts, clearly state that here and consider other actions you could take in the action plan in section 4.</i>
	<p>are informal carers.</p> <p>In previous engagement events, 81% of carers proposed that the short breaks service should become increasingly digitised to make it easier to access.</p> <p>Staff Have caring responsibilities – 14 people (56%) Do not have caring responsibilities – 10 people (40%) Unknown – 1 person (4 %)</p>	<p>respite to do (eg. work opportunities). They may be unsettled by the impact of the change on the person they care for, and worried that they will not settle well in a new setting. They may be worried about a need to change care staff from ones that they know and trust. If there is a need to travel further to new short breaks support, there may be financial implications and/or there may be carers who were previously able to transport the person they care for to a short break, but are no longer able to.</p> <p>The proposals to improve the short breaks booking processes offers opportunities to make this simpler for carers to do, and make this a more digitised service.</p> <p>The intention is that efficiencies made in the short term will help contribute to longer term plans to improve the range and quality of respite options for carers.</p> <p>Increased support for short breaks (respite) support in emergency situations – positive impact.</p>	<p>to settle into to this. There is sufficient capacity within the remaining short breaks units to accommodate the numbers currently using the units we are proposing to close, and these remain spread throughout Hertfordshire. There may be travel implications – longer journey times and additional travel costs.</p>

Protected characteristic group	What do you know⁷? What do people tell you⁸? Summary of data and feedback about service users and the wider community/ public <ul style="list-style-type: none"> • Who uses the service? • Who doesn't and why? • Feedback/complaints? • Any differences in outcomes? Why? 	What does this mean – what are the potential impacts of the proposal(s)⁹? - Consider positive and negative impacts - On service users / the public - <i>AND, where relevant, staff*</i> <i>* if your proposals relate mainly to a staff restructure or reorganisation, you should use the template here</i>	What can you do¹⁰? What reasonable mitigations to reduce or avoid the impact can you propose? How will you communicate/engage or provide services differently to create a 'level playing field' – e.g. consultation materials in easy read or hold targeted engagement events <i>If there is no current way of mitigating any negative impacts, clearly state that here and consider other actions you could take in the action plan in section 4.</i>
		Staff The majority of staff potentially impacted are carers (56%). This compares to 40% of the staff in the Short Breaks service as a whole (although the numbers are relatively small). Staff who are carers may require more flexibility to be able to effectively engage in consultations and may require adjustments to be taken into consideration if at risk of redundancy to allow them to fulfil caring responsibilities.	Hold a separate staff consultation on detailed proposed staffing changes and the implications (consulting both staff and Unions). Redeploy staff within the service where possible – there are likely to be opportunities for staff to move into current vacancies in the Supported Living and Short Breaks service. Any staff at risk of redundancy will be offered advice and support and 1-2-1 discussions where adjustments that are required can be raised.
Other relevant groups²¹ Consider if there is a potential impact (positive or negative) on areas such as health and wellbeing, crime and disorder, Armed Forces community.	Service users Feedback from service users and staff indicate that short breaks (respite) units are sometimes used by those in need of a safe space from abuse or harm.	Part of the proposals is to increase the availability and accessibility of short break (respite) support in emergency/crisis situations across Hertfordshire, and this can include providing a safe place for people at risk of harm or abuse. People utilising short breaks (respite) services for this reason may be particularly unsettled, or be placed at risk, if they had to move to a different unit.	Ensure that specific support requirements relating to safety from harm or abuse are considered when supporting individuals to move to a new alternative provision, and that this is identified early to allow for effective planning and minimise uncertainty.

Other potential impacts on affected group(s)?

<p>Community Opportunities project</p>	<p>The Community Opportunities project is reviewing and re-tendering a number of community/day opportunities contracts. A number of people using short break respite care will also be receiving support from these day opportunities. The timescales for this project are under review, but it is likely to do an initial round of contract changes in April 2020 and further changes after that.</p> <p>As of October 2018, nearly all of those who had a short breaks allowance also access day opportunities support.</p>	<p><u>CONSULTATION</u> The same group of people may be being consulted at the same time.</p> <p><u>PROPOSALS</u> The Community Opportunities project is about changing/enhancing the support offer - not about reducing services. However, if a particular provider chooses not to apply for the new contracts/framework then a service user may experience changes in their short breaks respite support and their day opportunities support at a similar time. The risk of this occurring is very small, but the impact could be very unsettling for a service user and their carers/families if it was to occur.</p>	<p>Ensure that consultation activities for the two projects do not clash. If possible, join-up consultation activity to minimise time expenditure for people affected by both.</p> <p>A detailed, case-by-case impact assessment will be undertaken for any person directly impacted by both proposals to minimise disruption where possible and/or support them and their carers/families through the change.</p> <p>Service users would have the option to continue to purchase previous day opportunities support from their original provider via Direct Payments.</p>
<p>ACS Transport Review</p>	<p>The ACS Transport Review is reviewing the current transportation policy and its application, which includes aspects of transportation for short-breaks respite care. It is due to set out recommendations at the end of September 2019.</p> <p>As of October 2018, over half of those who had a short breaks allowance also had allowance for transportation support.</p>	<p>If aspects of this were to change or the transportation policy would be applied much stricter then a service user may experience changes in their short breaks respite support and their transportation arrangements at a similar time.</p>	<p>Work closely with staff leading the ACS Transportation review to highlight potential implications as early as possible and update the Action Plan as required.</p> <p>Ensure that the recommendations from the ACS Transport Review are fed into the decision making process on the proposals.</p> <p>A detailed, case-by-case impact assessment will be undertaken for any person directly impacted by both proposals to minimise disruption where possible and/or support them and their carers/families through the change.</p>

<p>In-House Service Transformation Programme/HCC Property Transformation Programme</p>	<p>The Council is conducting a review of all council properties, including in-house short breaks buildings.</p>	<p>There may be impacts of this review on remaining short breaks centres, including closure or replacement. No specific proposals are currently agreed.</p>	<p>Work closely with staff leading the Council's Property Transformation Programme to highlight potential implications as early as possible and update the Action Plan as required.</p> <p>Ensure that the recommendations from the Council's Property Transformation Programme are fed into the decision making process on the proposals.</p> <p>A detailed, case-by-case impact assessment will be undertaken for any person directly impacted by both proposals to minimise disruption where possible and/or support them and their carers/families through the change.</p>
<p>Re-tendering of Support at Home contract</p>	<p>The current contracts for Council commissioned Support at Home (homecare) end in March 2020. The Council is therefore re-tendering these contracts, and changes some aspects of them to encourage more outcome focused support and increase the number of people with physical disabilities accessing reablement. There are no proposed changes to eligibility criteria.</p>	<p>A service user who has council-commissioned homecare support as well as accessing short breaks (respite) support may experience changes in their support from these at a similar time. This is likely to be a very small group, but the impact for individuals in this situation may be particularly unsettling.</p>	<p>A detailed, case-by-case impact assessment will be undertaken for any person directly impacted by both proposals to minimise disruption where possible and/or support them and their carers/families through the change.</p>

Opportunity to advance equality of opportunity and/or foster good relations²²

Part of the intention of the consultation is to seek feedback on support in emergency/crisis situations. The aim is to improve the availability of this type of support in the future, which would be an opportunity to advance equality of opportunity for people to access this and foster good relations with service users and their families/carers.

Undertaking the consultation is an opportunity to foster good relations with local learning/physical disability forums and partnerships, and community and voluntary sector support organisations such as Carers in Hertfordshire.

Conclusion of your analysis and assessment - select one of the outcomes below²³ and summarise why you have selected i, ii, iii or iv; what you think the **most important** impacts are; and the key actions you will take.

OUTCOME AND NEXT STEPS	SUMMARY
<p>i. No equality impacts identified</p> <ul style="list-style-type: none"> - No major change required to proposal 	
<p>ii. Minimal equality impacts identified</p> <ul style="list-style-type: none"> - Adverse impacts have been identified, but have been objectively justified (provided you do not unlawfully discriminate) - Ensure decision makers consider the cumulative effect of how a number of decisions impact on equality - No major change required to proposal 	
<p>iii. Potential equality impacts identified</p> <ul style="list-style-type: none"> - Take 'mitigating action' to change the original policy/proposal, remove barriers or better advance equality - Set out clear actions in the action plan in section 4. 	<p>Potential equality impacts have been identified for some protected characteristics – most notably 'disability' and 'carers' - which require proactive responses. This EQIA has also identified that there are other Council initiatives that could impact on the same group at a similar time, in particular potential changes to day opportunities services and Council transportation policies. The outcome from this assessment is that:</p> <ul style="list-style-type: none"> • action needs to be taken to ensure fair and meaningful engagement in consultations from all those potentially impacted • feedback from the consultation should be used to update this EQIA to feed into any final decision making on the proposals • A detailed, case-by-case impact assessment will be undertaken for any person directly impacted by proposals to minimise disruption where possible and/or support them and their carers/families

	<p>through the change. This will need to include consideration of people impacted by multiple changes at similar times.</p> <ul style="list-style-type: none"> • There is a need to make sure that the needs of each service user and their carer/family are fully assessed and that any special requirements are identified when supporting them to move to alternative accommodation. Analysis to date has indicated there is enough capacity within the remaining short breaks (respite) units to offer alternative provision. • There is a need to make sure that the needs of each staff member at risk of redundancy are fully assessed and that any special requirements are identified. There is a high probability that staff can be redeployed to vacancies within the Service.
<p>iv. Major equality impacts identified</p> <ul style="list-style-type: none"> - The adverse effects are not justified, cannot be mitigated or show unlawful discrimination - You must stop and remove the policy [you should consult with Legal Services] - Ensure decision makers understand the equality impact 	
<p>YOU SHOULD INCLUDE THE SUMMARY ANALYSIS ABOVE IN THE 'Equalities Implications' SECTION OF ANY REPORT(S) THAT GO TO DEPT. MANAGEMENT BOARDS / MEMBER PANELS / CABINET, AS WELL AS APPENDING A COPY OF THE EqIA</p>	

4. Prioritised Action Plan²⁴

Impact identified and group(s) affected	Action planned Include actions relating to: • mitigation measures • getting further research • getting further data/consultation	Expected outcome	Measure of success	Lead officer and timeframe
NB: These actions must now be transferred to service or business plans and monitored/reviewed to ensure they achieve the outcomes identified.				
Ensuring accessibility to consultations	Provide the consultation in a variety of formats including online, hardcopy, and opportunities for face-to-face engagement. Consider religious requirements, disability requirements and the requirements of carers when planning engagement events.	All potentially impact service users and their carers/families can understand the proposals and give feedback.	All potentially impact service users and their carers/families can understand the proposals and give feedback.	Vicky Swarbrick By end of Aug 2019
	Offer consultation documents in a variety of formats including easy-read, and ability to request other formats as required. Consider disability and carers requirements when designing these.			Vicky Swarbrick By end of Aug 2019
Potential job losses for impacted staff	Separate staff consultation if there is a decision to close short breaks units. Redeployment of staff where possible into existing vacancies within the Support Living & Short Breaks service. 1-2-1 meetings held as part of the staff consultation where staff can raise adjustments they require.	Minimise redundancy by redeploying staff instead where possible. Individual requirements for staff as met as part of any restructure process.	Minimise redundancy by redeploying staff instead where possible. Individual requirements for staff as met as part of any restructure process.	Fehmida Cummins Jan 2020
Impact of unit closures on service users and their families/carers currently using those units.	Carry out detailed planning, in discussion with directly impacted service users and their families/carers, to establish options for suitable alternative short breaks support that meets assessed need and considers individual requirements relating to protected	All service users/carers directly impacted are offered suitable alternative support.	All service users/carers directly impacted are offered suitable alternative support.	Vicky Swarbrick Timescale tbc.

	characteristics.			
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This EqIA has been signed off by:

Lead Equality Impact Assessment officer: Vicky Swarbrick

Date: 22.08.2019

Head of Service or Business Manager: Mark Harvey

Date: 29.08.2018

Review date: Dec 2019

Please now send the completed EqIA to equalities@hertfordshire.gov.uk

Please also ensure that the EqIA is referenced in and included as an appendix to reports to Management Boards Cabinet Panels and Cabinet so that decision makers can consider equality impacts before making decisions.

Guidance end-notes

¹ The following principles explain what we must do to fulfil our duties under the Equality Act when considering the effect of existing and new policies/practices/services on equality. They must all be met or the EqIA (and any decision based on it) may be open to challenge:

- **Knowledge:** everyone working for the council must be aware of our equality duties and apply them appropriately
- **Timeliness:** the duty applies at the time of considering proposals and **before** a final decision is taken
- **Real Consideration:** the duty must be an integral and rigorous part of your decision-making and influence the process.
- **Sufficient Information:** you must assess what information you have and what is needed to give proper consideration.
- **No delegation:** the council is responsible for ensuring that anyone who provides services on our behalf can comply with the duty, are required in contracts to comply with it, and do comply in practice. It is a duty that cannot be delegated.
- **Review:** the equality duty is a continuing duty – it continues after proposals are implemented/reviewed.
- **Proper Record Keeping:** we must keep records of the process and the impacts identified.

² Our duties in the Equality Act 2010

HCC has a legal duty under this Act to show that we have identified and considered the impact and potential impact of our activities on all people with 'protected characteristics' (see end notes 11-20 for details of the nine-protected characteristics). This applies to policies, services (including commissioned services), and our employees. **If you are creating an 'arms-length' company**, seek advice from the Equality Team or Legal.

We use this template to do this and evidence our consideration. **You must give 'due regard' (pay conscious attention) to the need to:**

- **Avoid, reduce or minimise negative impact:** if you identify unlawful discrimination, including victimisation and harassment, you must stop the action and take advice immediately.
- **Promote equality of opportunity:** by
 - Removing or minimising disadvantages suffered by equality groups
 - Taking steps to meet the needs of equality groups
 - Encouraging equality groups to participate in public life or any other activity where participation is disproportionately low
 - Consider if there is a need to treat disabled people differently, including more favourable treatment where necessary
- **Foster good relations between people who share a protected characteristic and those who don't:** e.g. by promoting understanding.

³ EqIAs **should always be proportionate** to:

- The size of the service or scope of the policy/strategy
- The resources involved
- The size of the likely impact – e.g. the numbers of people affected and their vulnerability

The greater the potential adverse impact of the proposal(s) on a protected group (e.g. disabled people) and the more vulnerable the group is, the more thorough and demanding the process required by the Act will be. Unless they contain sensitive personal/employee data – EqIAs are public documents. They are published with Cabinet and Panel papers and public consultations and are available on request.

⁴ **Who completes the EqIA:** The person who is making the decision or advising the decision-maker about a policy. It is better to do this as a team, with people involved who understand the implementation of the policy.

⁵ **Title of EqIA:** This should clearly explain what service / policy / strategy / change you are assessing.

⁶ **Focus of EqIA:** A member of the public should have a good understanding of the policy or service and any proposals after reading this section. Please use plain English and write any acronyms in full first time. Also explain if there is a particular focus to your equality analysis:

- What are the main aims or purpose of the policy, practice, service or function? How does it fit with other services?
- What outcomes do you want to achieve, why and for whom? e.g. what do you want to provide, what will change/improve?
- Which aspects are most important to equality and should be the focus of your attention?
- You should state all teams/organisations involved in implementing, carrying out or delivering the policy, practice or service
- What are the **reason(s)** for the proposal or change (financial, service, legal etc)? The Act requires us to make these clear.

⁷ **Data & Information:** Your EqIA needs to be informed by data. You should consider the following:

- What data relevant to the impact on protected groups is available? (is there an existing EqIA?, local service data, national data, community data, similar proposal in another local authority).
- What further evidence is needed and how can you get it? (e.g. further research or engagement with the affected groups).
- What do you know from service/local data about needs, access and outcomes? Focus on each characteristic in turn.
- What might any local demographic changes or trends mean for the service or function? Also consider national data if appropriate
- Does data/monitoring show that any policies or practices create particular problems or difficulties for any group(s)?
- Is the service having a positive or negative effect on particular people or groups in the community?

⁸ **What have people told you about the service, function, area?**

- Use service user feedback, complaints, audits, and/or the results of specific consultation/engagement
- Are there patterns or differences in what people from different groups tell you?
- Remember, you must engage/consult appropriately and in an inclusive way with those likely to be affected to fulfil the equality duty.
- You can read HCC's [Consultation](#) and [Engagement](#) toolkits for full advice on this
- For practical tips and advice on consulting with people from protected groups, see this ['How-to' guide](#)

⁹ **Impact:** Your EqIA must consider fully and properly **actual and potential impacts** against each protected characteristic:

- The equality duty does not stop changes, but means we must fully consider and address the anticipated impacts on people.
- Be accurate and transparent, but also realistic: don't exaggerate speculative risks and negative impacts.
- Be detailed and specific where you can so decision-makers have a concrete sense of potential effects.
- Questions to ask when assessing whether and how the proposals impact on service users, staff and the wider community:
 - Are one or more protected groups affected differently and/or disadvantaged? How, and to what extent?
 - Is there evidence of higher/lower uptake among different groups? Which, and to what extent?
 - Does the project relate to an area with known inequalities (where national evidence or previous research is available)?
 - If there are likely to be different impacts on different groups, is that consistent with the overall objective?
 - If there is negative differential impact, how can you minimise that while taking into account your overall aims?
 - Do the effects amount to unlawful discrimination? If so the plan **must** be modified.
 - Does it relate to an area where equality objectives have been set by HCC in our [Equality Strategy](#)?

¹⁰ **Consider actions relating to the following:**

- That specifically address the impacts you've identified and show how they will remove, reduce or avoid any negative impacts
- Explain clearly what any mitigating measures are, and the extent to which you think they will reduce / remove the adverse effect
- Will you need to communicate or provide services in different ways for different groups in order to create a "level playing field"?
- State how you can maximise any positive impacts or advance equality of opportunity.
- If you do not have sufficient equality information, state how you can fill the gaps.

¹¹ **Age:** People of all ages, but consider in particular children and young people, older people and carers, looked after children and young people leaving care. Also consider working age people.

¹² **Disability:** When looking at disability, consideration should be given to people with different types of impairments: physical (including mobility), learning, aural or sensory (including hearing and vision impairment), visible and non-visible impairment. Consideration should also be given to: people with HIV, people with mental health needs and people with drug and alcohol problems. People with conditions such as diabetes and cancer and some other health conditions also have protection under the Equality Act 2010.

¹³ **Gender Reassignment:** In the Act a transgender person is someone who proposes to, starts or has completed a process to change his or her gender. A person does **not** need to be under medical supervision to be protected. Consider transgender people, transsexual people and transvestites.

¹⁴ **Pregnancy and Maternity:** When looking at pregnancy and maternity, give consideration to pregnant women, breastfeeding mothers, part-time workers, women with caring responsibilities, women who are lone parents and parents on low incomes, women on maternity leave and Keeping in Touch days.

¹⁵ **Race/Ethnicity:** Apart from the common ethnic groups, consideration should also be given to Gypsy, Roma and Irish Travellers communities, people of other nationalities outside Britain who reside here, refugees and asylum seekers and speakers of other languages.

¹⁶ **Religion and Belief:** Religion includes any religion with a clear structure and belief system. As a minimum you should consider the most common religious groups (Christian, Muslim, Hindu, Jews, Sikh, Buddhist) and people with no religion or philosophical belief(s).

¹⁷ **Sex/Gender:** Consider girls and women, boys and men, married people, civil partners, part-time workers, carers (both of children with disabilities and older cares), parents (mothers and fathers), in particular lone parents and parents on low incomes.

¹⁸ **Sexual Orientation:** The Act protects bisexual, heterosexual, gay and lesbian people.

¹⁹ **Marriage and Civil Partnership:** consider married people and civil partners – e.g. do same sex couple in a civil partnership have the same rights and benefits as married people?

²⁰ **Carers:** From April 2015, carers (people who provide unpaid care to a friend or relative) have been entitled to an assessment of their own needs in the same way as those they care for. Although not a 'protected characteristic' HCC Diversity Board has agreed that the impact of proposals on carers should also be considered.

²¹ **Other relevant groups:** You should consider the impact on our service users in other related areas, such as health and wellbeing, crime and disorder (e.g. people experiencing domestic abuse), community relations and socio-economic status (e.g. homelessness or low incomes). If the proposal is likely to have an impact on service users in these areas, HCC Public Health and the County Community Safety Unit may be able to help. Also consider whether your policy

or decision will impact current or former Armed Forces personnel living and working in Hertfordshire. The Council is committed to the Hertfordshire Community Covenant, a commitment from public and private organisations in the county to support the active and retired Armed Forces community.

²² **Equality of opportunity and good relations:** summarise anything that will have a potential positive impact over and above the work of your project – e.g. engaging with the community may help raise awareness and community understanding of the needs of certain groups.

²³ **Conclusion**

- Make a frank and realistic assessment of the overall extent to which the negative impacts can be reduced or avoided by the mitigating measures. Also explain what positive impacts will result from the actions and how you can make the most of these.
- Make it clear if a change is needed to the proposal itself. Is further engagement, research or monitoring needed?
- Make it clear if, as a result of the analysis, the policy/proposal should be stopped.

²⁴ **Action Planning:** The Equality Duty is an ongoing duty: policies must be kept under review, continuing to give ‘due regard’ to the duty. If an assessment of a broad proposal leads to more specific proposals, then further equality assessment and consultation are needed.