

**DRAFT HERTFORDSHIRE SUPPORTING ADULTS WITH COMPLEX NEEDS STRATEGY
APPENDIX TWO: EQIA**

Item 3
Appendix 2

Title of strategy	Hertfordshire Supporting Adults with Complex Needs Strategy
Names of those involved in completing the EqlA	Kami Chahal, Commissioning Monitoring Officer
Head of Service or Business Manager	Sukhvinder Rai, Development Manager
Team/Department	Strategic Partnerships Team – Complex Needs
Lead officer contact details	Helen Gledhill, Strategic Lead for Domestic Abuse and Adults with Complex Needs
Focus of EqlA	<p>Hertfordshire County Council (the County Council) is committed to achieving diversity and equality of opportunity both as a large employer of people and as a provider and commissioner of services. We strive to go beyond our duty to ensure that our practice in diversity and equality is embedded in everything we do. Against a background of tough economic times and a changing demography we need to be even more aware of the diverse needs of communities and how we can support them.</p> <p>All contracted providers of services are required to demonstrate effective equalities policies and procedures and adherence is checked as part of the regular monitoring process / visits. Providers are therefore expected to have clear arrangements to promote equality of access and eliminate discrimination.</p> <p>This improved strategy is designed to assist to support individuals with complex needs. The purpose of this EqlA is to measure differential impacts on all protected characteristics.</p> <p><u>Overview of strategy</u></p> <p>Hertfordshire Supporting Adults With Complex Needs strategy(the Strategy) sets out our vision, priorities and aims for addressing the complexity of need presented by some of our most vulnerable residents in the County, many of whom become known to services as a result of homelessness or when they are at risk of homelessness.</p> <p>These people have diverse and complex needs, requiring different levels of support relating</p>

to mental health, substance misuse and domestic abuse.

The County Council has commissioned these support services to vulnerable people since 2003 as part of the UK Government's then national £1.8bn ring-fenced grant funded Supporting People Programme; intended to fund services to help vulnerable people live independently within their homes and communities. The Supporting People Programme ring-fence was removed in 2009 allowing local authorities greater flexibility to seek solutions and allocate funding according to locally determined priorities and need. The County Council remains the responsible budget holder for the related grant funding.

Whilst there are a range of community services in place to meet specific needs such as drugs and alcohol, mental health, domestic abuse and homelessness, there is evidence¹ to suggest that such needs typically interact with and exacerbate one another leading to people experiencing several problems simultaneously. As a result, people often find themselves falling between services or not meeting individual statutory service thresholds which in turn results in the continuation and escalation of their struggle and the increasing complexity of being homeless and having a number of support needs to address.

The aim of these support services is to provide short-term support that enables people to develop, improve and maintain the skills and lifestyle choices to break free and move on to an independent healthy and happier life. This often includes connecting people with other services, work and training opportunities, and social contacts that help make this achievable.

Adult Care Services have engaged with key stakeholders including service users and representatives from the Ministry of Housing, Communities and Local Government, to agree key strategic priorities, aims and principles to inform the Council's approach in re-designing prevention services and implement a commissioning solution that is evidence based, consistent, fair and cost-effective in meeting the needs of people with such vulnerabilities; reducing the need for more costly statutory interventions.

¹https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/680010/evidence_review_adults_with_complex_needs.pdf



Furthermore, our engagement has presented the opportunity to address silo commissioning and explore optimum use of resources through a partnership approach to the re-design of services from April 2021.

The Strategy seeks to meet Hertfordshire's ambition to provide the *Opportunity for everyone to achieve their full potential*. The strategic priorities align with Hertfordshire's Prevention Strategy 2019 in ensuring that "services work in more preventative ways – providing those things to our residents that are likely to avoid or reduce their losing independence, and avoid or reduce need for a more costly or complex service in the future;

- supporting individuals, families and organisations to thrive,
- to use services differently and ultimately help prevent the need for more complex services in the future"¹

This Strategy will be delivered alongside the Supported Accommodation Strategy to ensure a holistic approach to help more people stay in their own home or maintain their tenancy - and to develop the models of statutory care required to meet Hertfordshire's future demand for supported accommodation.

Service Definition and outcomes

- To enable adults with a range of support needs to live as independently as possible in the community
- The support is to be short-term, up to 18 months in most cases
- To be effective in delivering prevention outcomes to adults affected by:

¹ <https://democracy.hertfordshire.gov.uk/documents/s4029/Item%203-HCC%20Prevention%20Strategy.pdf>

- o mental health issues
- o domestic abuse
- o substance and alcohol misuse
- o homelessness (single and families)
- o rough Sleeping

Strategic Aims

Collaboration and best value will underpin all the strategic aims:

- **Fair Access to Services** - To ensure equality of access to services through a comprehensive understanding of need and current provision. Mapping need for future provision, across different parts of the county, to include information and choice for service users
- **Prevention and crisis intervention** - Through joint working with key partners, we will identify opportunities to design cohesive pathways; coordinating services to meet a spectrum of need, achieving improved outcomes for service users.
- **Housing Provision** - To ensure access to suitable housing solutions from Hospitals and short-term accommodation through robust partnership working with private landlords, registered housing providers, district/borough councils, Hertfordshire County Council and other statutory agencies.
- **Transformation and Innovation** - To continually review services, ensuring that they are meeting changing needs; reflecting the local and national agenda and key partners to explore innovative ways to work together to achieve this.

Statutory Framework

Under section 2 of the [Care Act 2014](#) (the Act)¹, the County Council must provide or arrange for the provision of services, facilities or resources to prevent, reduce or delay care needs.

Reducing social isolation and enabling social connection, facilitating mobility and mental and physical well-being, and by enabling a home environment allows individuals to live well and have a better quality of life.

The obligation to promote individual's wellbeing, as outlined in section 1 of the Act and its accompanying Statutory Guidance, includes the suitability of living accommodation as

underpinning the County Council's functions in addressing a person's care and support needs.

The Act further provides that local authorities are required to carry out care and support responsibilities with the aim of promoting greater integration with health and health-related services and recognise accommodation as a key part of this process.

The County Council's responsibilities under the Act also include: -

- establishing and maintaining an information and advice service available to everyone in the area, not just those who are entitled to care and support from the council
- promoting integration with the NHS and working with other key partners to improve services locally
- making enquiries if it believed that an adult is, or is at risk of, being abused or neglected

Whilst the Care Act sets out obligations for both single and two tier local authorities on housing and accommodation respectively, the County Council and the District and Borough Councils will utilise established local governance, through the [Hertfordshire Supported Housing Strategic Board](#), to deliver this Strategy.

The [Homelessness Reduction Act 2017](#) has inserted a new section 213B in to the Housing Act 1996. The County Council is specified in regulations published as a result of the Homelessness Reduction Act 2017 being required to notify a local housing authority of service users they consider may be homeless or threatened with homelessness (i.e. it is likely they will become homeless within 56 days).

The [Homelessness Code of Guidance](#) states that "Authorities are encouraged to establish arrangements with partners that go beyond referral procedures, aiming to maximize the impact of shared efforts on positive outcomes for service users who may have multiple needs. Such arrangements can advance the objectives of partner agencies and deliver efficiencies for the public purse."

Furthermore, the Homelessness Code of Guidance states that referring authorities should be mindful that for certain individuals, rather than making a referral, it may be more appropriate to assist them to approach a housing authority directly for assistance.

Key Facts:

The [Hertfordshire Joint Strategic Needs Assessment for housing related support 2019](#) highlights the following key facts.

- The Ministry of Housing, Communities and Local Government report that between April and December 2018, in Hertfordshire over 3,000 homelessness approaches were made and of these, 1292 had support needs¹
- The top 5 support needs of households owed a homelessness prevention or relief duty are: 1) mental health problems, 2) physical ill health & disability, 3) at risk of/experienced domestic abuse, 4) history of repeat homelessness and 5) history of rough sleeping
- Broxbourne, North Hertfordshire and Welwyn Hatfield have the highest proportion of households with support needs owed a homelessness prevention or relief duty; with over 60% of households in Broxbourne requiring support
- The rates of statutory homelessness in Hertfordshire and England are increasing
- The largest proportion of people owed a homelessness prevention or relief duty are ages 25-34 years
- The average age at death of a Rough Sleeper was 45 years for males and 43 years for females in 2018; in the general population of England and Wales, the average age of death was 76 years for men and 81 years for women.

Guiding principles for future commissioned services will include:

- Establish, deliver and evaluate a pilot project adopting some of the principles such as the 'Hub' and 'pooled budgets'
- Develop mechanisms for joint monitoring recognising that services are to achieve

¹ Not all self-reported support needs will meet Care Act eligibility

	<p>outcomes across mental health, drug & alcohol and homelessness.</p> <ul style="list-style-type: none"> • Explore opportunities for joint commissioning to compliment and avoid duplication in services • Support Service Providers with knowledge and learning to make services resilient and support innovation • To continue to contribute to the development of the Hertfordshire JSNA for Homeless and Adults with Complex Needs to inform service provision
<p>Stakeholders</p>	<p>Service users and their families/carers Local Communities Hertfordshire County Council and its employees:</p> <ul style="list-style-type: none"> • Integrated Community Commissioning Teams: Community Support, Accommodation, Integrated Health & Care Commissioning • Adult Care Services • Children’s Services • Adults with disabilities • Public Health • Finance & income teams • Strategic Procurement <p>Current providers and their staff Hertfordshire Clinical Commissioning Groups supporting Herts residents Health Providers (including HPFT, Acute & Community Hospitals & HCT) District and Borough Councils Police (Herts Constabulary & Office & Crime Commissioners Team) Ministry of Housing County Councillors and local MP’s Voluntary Sector Services</p>

2. List of data sources used for this EqIA

Title and brief description	Date	Gaps in data
Public Health Intelligence	June 2019	
Ministry of Housing, Government and Local Communities	June 2018	
Hertfordshire Joint Strategic Needs Assessment for Housing Related Support 2019	2019	
KPI monitoring data	Feb – April 2020	A KPI monitoring workbook has been developed to collate provider KPI data on current service provision as per contractual requirements, which will include current service user data. The data will have some breakdown of protected characteristics.
Office of National Statistics (ONS)	2018	
National Census 2011	2011	

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

Protected characteristic group	What do you know ² ? What do people tell you ³ ? •	What does this mean – what are the potential impacts of the proposal(s) ⁴ ?	What can you do ⁵ ?
Age ⁶	<p>According to Office of National Statistics 2018 estimate, the total population of Hertfordshire is 1, 184, 365.</p> <p>Of this number:</p> <ul style="list-style-type: none"> • 20.6% are children aged under 16 • 2.3% are young people aged 16 or 17 • 62.4% are working age aged between 16 – 64 • 17% are older people aged 65 or over <p>Hertfordshire population is projected to be 1, 364, 100 by 2041 (ONS 2016- based population projection).</p> <p>These services are for adults aged 18+.</p> <p>However, section 189 of Housing Act 1996 defines the categories of people who</p>	<p>Positive impacts on all stakeholders through:</p> <p>Development of integrated pathways of care and support across the county that take account of varied and potentially multiple needs of people owed a homeless duty, particularly about mental health and domestic abuse issues.</p> <p>Adoption of a whole system, integrated approach to tackling homelessness which includes primary, secondary and tertiary prevention, developed with statutory and non-statutory stakeholders.</p> <p>Improvements in the early identification of people at higher risk of becoming homeless in the future including young people and people leaving some form of institutionalised care (i.e. hospital, prison, or mental health facility)</p> <p>Addressing needs of different age groups in any new commissioning</p>	<p>Comprehensive stakeholder engagement process to design and co-produce new services and pathways, including pre-procurement market engagement events with partners/providers, service user and carer focus groups to implement and embed the strategy.</p> <p>A clear communication plan will need to put in place to ensure that all stakeholders are kept informed of any potential changes, for example, such as service users in relation to change of provider, to support them and their families/carers through any transition process.</p> <p>A robust commissioning and monitoring framework to monitor the impact of services on protected characteristics, to review and adapt services to meet these needs.</p>

Protected characteristic group	What do you know ² ? What do people tell you ³ ? •	What does this mean – what are the potential impacts of the proposal(s) ⁴ ?	What can you do ⁵ ?
	<p>must be accepted as in priority need:</p> <ul style="list-style-type: none"> • Households with whom dependent children reside or might be reasonable expected to reside • All 16 – 17-year olds provided they are a “relevant child” (relevant children remain responsibility of social services) or a child in need to whom local authority owes a duty under section 20 of the Children Act 1989 • All 18 – 20-year olds other than “relevant students”) who at any time after reaching the age of 16, but while still under 18 were, but are no longer, looked after, accommodated or fostered • Any person who has lost her/his accommodation as a 	<p>plans, with considerations for the range of ages represented in the local data and recognising specific needs of single people, young people and older people.</p> <p>Provision of additional resources for mental health services for people with housing related needs.</p> <p>A joined up and consistent approach between county and district levels to reduce unwarranted variation in provision across the county, taking account of challenges faced by districts in providing accommodation.</p> <p>Engagement is being undertaken with stakeholders as part of</p>	

Protected characteristic group	What do you know ² ? What do people tell you ³ ? •	What does this mean – what are the potential impacts of the proposal(s) ⁴ ?	What can you do ⁵ ?
	<p>result of an emergency such as flood, fire, or other disaster</p> <p>The Housing Act 1996 also defines the following groups who will be accepted as in priority need provided that the authority is satisfied that they are vulnerable, as a result of:</p> <ul style="list-style-type: none"> • Old age, mental illness or disability, physical disability or other special reasons or someone who lives with one of these categories of vulnerable people • Having been looked after, accommodated or fostered and is aged 21 or over (other than “relevant students) • Having been a member of Her Majesty’s regular naval, military or air forces • Having served a custodial sentence, been committed for 		

Protected characteristic group	What do you know ² ? What do people tell you ³ ? •	What does this mean – what are the potential impacts of the proposal(s) ⁴ ?	What can you do ⁵ ?
	<p>contempt of court or similar offence or been remanded in custody</p> <ul style="list-style-type: none"> • Having had to leave accommodation because of violence or threats of violence from another person that are likely to be carried out <p>There has been limited monitoring of the current provision which means that there is a lack of reliable performance data to fully and effectively evaluate the current provision.</p>		
Disability ⁷	<p>According to 2011 Census data, 14.3% of the resident population of Hertfordshire reported that they had a long-term health condition or disability that limited their day to day activities to some extent.</p> <p>Based on the strategy,</p>	<p>It is anticipated that based on the new strategy there will be a positive impact on people with disabilities since they are classed as disadvantaged groups who may currently experience difficulties in accessing the appropriate services.</p> <p>.</p>	<p>A robust commissioning and monitoring framework to ensure that future service provision is equitable to all including excluded/disadvantaged groups. There will need to be continual review and services updated to ensure needs are being met.</p> <p>Monitoring of current services will focus around identifying and understanding needs such as mental health, alcohol and substance misuse and the varying levels of need to assist in shaping future provision</p>

Protected characteristic group	What do you know ² ? What do people tell you ³ ? •	What does this mean – what are the potential impacts of the proposal(s) ⁴ ?	What can you do ⁵ ?
	<p>statutory framework and Equality Act 2010, people with disabilities are identified as a priority group since they have been identified as being at higher risk of experiencing homelessness.</p> <p>However, there is limited equalities data on the breakdown on types of disabilities in the current provision such as mental health, LD, sensory impairments, physical disabilities.</p> <p>It is known that there may be services within the current provision that do not currently have disability friendly access and there are plans to change this with the new provision.</p>		
Gender reassignment⁸	Research shows people undergoing gender re-assignment are more likely to suffer with mental health	The strategy and any new services that are commissioned as a result of this will need to consider the requirements of the Equality Act 2010.	Commissioning and monitoring framework to ensure that new service provision includes onus on third party suppliers to ensure equity of access to services for protected characteristics to comply with the requirements of new legislation and the

Protected characteristic group	What do you know ² ? What do people tell you ³ ? •	What does this mean – what are the potential impacts of the proposal(s) ⁴ ?	What can you do ⁵ ?
			Equality Act 2010.
Pregnancy and maternity ⁹	As a result of the new strategy there should be positive impacts for pregnant women and anyone residing with a pregnant woman as a result of the new strategy.	Section 189 of the Housing Act 1996 defines pregnant women or anyone who resides with a pregnant woman as one of the five categories of people who must be accepted as in priority need.	A communications strategy that takes account of the needs of all stakeholders including those with protected characteristics to inform and advise on the implications of the new strategy. This may include information in different formats such as briefings, leaflets in large print, hearing loops, braille etc.
Race ¹⁰	The National Census 2011 figures show that of the total population that were in a minority ethnic group (i.e. not white-British), the figure was 19.8%. As with other protected characteristics, there are gaps in recording of data in respect of race/ethnicity in the current provision, and further data collation is needed in respect of impacts of the strategy on this group.	There should be positive impacts on the Black and Minority Ethnic (BME) population as a result of the new strategy.	Incorporating the needs of the BME population in the commissioning and monitoring frameworks for future provision.
Religion or belief ¹¹	The main source of data on religion is the national census but this question is optional on the form. The 2011 Census showed that 58.25%	The strategy seeks to support the needs of all vulnerable groups, regardless of their religious beliefs. Additionally, the requirements set out in the Equality Act 2010 will need to be	Incorporating the needs of all protected characteristics in the population in the commissioning and monitoring frameworks for future provision, as noted above.

Protected characteristic group	What do you know ² ? What do people tell you ³ ? •	What does this mean – what are the potential impacts of the proposal(s) ⁴ ?	What can you do ⁵ ?
	<p>stated that they were Christian with no religion as the next largest category at 26.53% and religion not stated at 7.23%.</p> <p>There is minimal local data relating to homelessness and religion and/or belief.</p>	<p>incorporated in future.</p>	
Sex/Gender ¹²	<p>Of the estimated total population (ONS population estimate 2018), 49% were male and 51% female.</p> <p>Data collation is in process with current provision that will identify gender of users of the current provision.</p>	<p>As noted above, the strategy seeks to meet the needs of all protected characteristics.</p>	<p>As noted above, the needs of all protected characteristics in the population will be incorporated in future commissioning and monitoring frameworks and a more robust approach to data collation is proposed to monitor this and a more robust approach to data collation is proposed to monitor the impacts of this to ensure all protected characteristics have equitable access to services.</p>
Sexual orientation ¹³	<p>The National Census 2011 did not have a question about sexual orientation, but According to the ONS statistical bulletin 2017 on sexual identity but a question around this is planned for the Census 2021. Therefore, the ONS carried out a statistical</p>	<p>The new strategy seeks to address the needs of all protected characteristics.</p>	<p>The focus of the new strategy is to reach excluded/disadvantaged groups. The needs of all protected characteristics in the population will be incorporated in future commissioning and monitoring frameworks and a more robust approach to data collation is proposed to monitor this to ensure all protected characteristics have equitable access to services.</p>

Protected characteristic group	What do you know ² ? What do people tell you ³ ? •	What does this mean – what are the potential impacts of the proposal(s) ⁴ ?	What can you do ⁵ ?
	<p>study, Sexual Orientation, UK, 2017 which shows:</p> <ul style="list-style-type: none"> • The proportion of the UK population aged 16 years and over identifying as heterosexual or straight has decreased from 94.4% in 2012 to 93.2% in 2017. • Over the last five years, the proportion of the UK population identifying as lesbian, gay or bisexual (LGB) has increased from 1.5% in 2012 to 2.0% in 2017, although the latest figure is unchanged from 2016. • In 2017, there were an estimated 1.1 million people aged 16 years and over identifying as LGB out of a UK population aged 16 years and over of 52.8 million. 		

Protected characteristic group	What do you know ² ? What do people tell you ³ ? •	What does this mean – what are the potential impacts of the proposal(s) ⁴ ?	What can you do ⁵ ?
	<ul style="list-style-type: none"> • Males (2.3%) were more likely to identify as LGB than females (1.8%) in 2017. • People aged 16 to 24 years were most likely to identify as LGB in 2017 (4.2%). • Regionally, people in London were most likely to identify as LGB (2.6%), with people in the North East and East of England the least likely (both 1.5%). • 69.4% of people who identified themselves as LGB had a marital status of single (never married or in a civil partnership). <p>There is minimal local data on homelessness and sexual orientation currently.</p>		

Protected characteristic group	What do you know ² ? What do people tell you ³ ? •	What does this mean – what are the potential impacts of the proposal(s) ⁴ ?	What can you do ⁵ ?
Marriage and civil partnership¹⁴	<p>Data for Hertfordshire based on 2011 Census shows:</p> <ul style="list-style-type: none"> • 49.87% stated that they were married • 32.48% said they were single • 8.49% divorced or formerly in a civil partnership • 6.53% widowed or surviving from a civil partnership • 2.47% said they were separated • 0.15% said they were in a civil partnership <p>There is minimal local data on homelessness and marriage and civil partnership</p>	<p>The new strategy seeks to address the needs of all protected characteristics.</p>	<p>The needs of all protected characteristics in the population will be incorporated in future commission and monitoring frameworks and a more robust approach to data collation is proposed to monitor the impacts and ensure that all protected characteristics have equitable access to services.</p>
Carers¹⁵	<p>T According to 2011 Census data, 9.7% of the resident population stated that they provide unpaid care.</p> <p>here is minimal local data on homelessness and carers.</p>	<p>Whilst the strategy seeks to address the needs of all protected characteristics, more research needs to be undertaken to investigate the impact of the strategy on carers to ensure mitigations are put in place.</p>	<p>Future commissioning and monitoring frameworks need to ensure that carers are identified as early as possible and that as with other protected characteristics, they have equitable access to services. The statutory framework for the strategy also outlines the requirements under the Care Act 2014 which identifies the needs of carers in their own</p>

Protected characteristic group	What do you know ² ? What do people tell you ³ ? •	What does this mean – what are the potential impacts of the proposal(s) ⁴ ?	What can you do ⁵ ?
	<p>However, research has shown that carers who give up work to care for family members requiring support experience financial hardships that may affect their ability to sustain their homes.</p>		<p>right and the need for local authorities to provide appropriate support and services.</p>
<p>Other relevant groups¹⁶ Consider if there is a potential impact (positive or negative) on areas such as health and wellbeing, crime and disorder, Armed Forces community.</p>	<p>Whilst there is minimal local data on other relevant groups, for example ex-offenders, victims of domestic abuse, members of Her Majesty's naval, air or military forces, based on the JSNA for Housing Related Support 2019 and Public Health Intelligence data, they have been identified as priority groups in the strategy, who are known to be excluded/disadvantaged.</p>	<p>The Strategy seeks to address the needs of other relevant groups with positive impacts as they are known as excluded/disadvantaged groups.</p>	<p>The needs of all protected characteristics in the population will be incorporated in future commission and monitoring frameworks and a more robust approach to data collation is proposed to monitor the impacts and ensure that all protected characteristics have equitable access to services. The strategy seeks to implement more streamlined and integrated pathways with partners such as health, district and borough councils, housing providers, police, probation services and social care.</p>

Opportunity to advance equality of opportunity and/or foster good relations¹⁷

This Strategy’s objective is to co-ordinate and design a range of services that are accessible to vulnerable people, some of whom may currently face exclusion. The design of future service provision will consider communication, access and a need to review services regularly to ensure that there is full compliance with the County Council’s Equalities Strategy.

A comprehensive Equalities Impact Assessment will be undertaken to ensure that any proposed service model is inclusive and that appropriate measures are in place to mitigate any inequalities identified.

Conclusion of your analysis and assessment

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><i>It is proposed to address any potential negative impacts through the housing related support service procurement and tender process.</i></p> <p><i>The strategic aims and guiding commissioning principles outlined in the strategy, propose to join up and integrate service pathways. It is anticipated that there will be positive impacts for service users with complex needs as a result of re-designing services so that support needs can be identified earlier.</i></p> <p><i>Working with partners, district and borough councils in Hertfordshire to agree a process for collating standardised data on specific groups in their areas. This will enable a better understanding on the future</i></p>

	<p><i>needs against the individual protected characteristics.</i></p> <p>.</p>
<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 	

DRAFT

4. Prioritised Action Plan¹⁸

Impact identified and group(s) affected	Action planned	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.				
Clear Communications Strategy with all stakeholders, (Internal and external), and all protected characteristics	Key messages are developed as part of a countywide communication strategy to publicise and embed the strategy, with consideration given to a variety of communication tools to meet needs of a variety of stakeholders	A robust communication plan, with key messages in a variety of formats, e.g. briefings, written updates etc to meet the needs of all stakeholders and protected characteristics	Plan in place and feedback from stakeholders	Sukhvinder Rai Feb 2020 - ongoing
Commissioning arrangements and service provision	Having a commissioning and monitoring framework in place	Undertake Equality Impact Assessment of all complex needs services. All complex needs service to include a) protected characteristics reporting, b) implementation of mitigators where underrepresentation is identified, c) case studies as part of routine performance reporting to evidence how needs of	Commissioning of new services following production of common monitoring framework to measure impact on different protected characteristics	Sukhvinder Rai – Jan 2020 – Mar 2021 (as services are reviewed and line with the commissioning timetable)

		<p>different equality groups are being met through service provision.</p> <p>Involving key stakeholders Inc. partner organisations, vol sector and people with complex needs in the process to influence service delivery design.</p> <p>Ensure appropriate level of commissioning resource to provide ongoing contract monitoring/service development for all complex needs commissioned services.</p> <p>Opportunities are given to organisations to access procurement information (important for organisations including those who may be inexperienced in the process and/or have minimal</p>		
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		<p>infrastructure.</p> <p>Commissioners to explore new service delivery models to meet requirement for a more efficient, integrated and equitable offering across Herts; a) ensuring appropriate staff training within commissioned services to enhance the skill set around different equality group needs, b) analysis of learning from pilot project to inform service re-design.</p>		
Complex needs strategy performance reporting	Complex needs strategy performance framework agreed	Ensure performance reporting against implementation of the complex needs strategy includes service breakdowns and analysis for service take up against Individuals' protected characteristics.	Ensuring the complex needs monitoring against framework is carried out	Sukhvinder Rai/Kami Chahal April 2021 - ongoing
Monitor impacts of new model pilot in Broxbourne	Development of pilot service in Broxbourne	Evaluation and learning from Broxbourne pilot to	Information and learning from pilot to provide guidance and	Sukhvinder Rai/Complex Needs Team

		support service delivery design and implementation of strategy	direction for the redesign and commissioning of new services.	April 2020 - ongoing
Interrogation of Ministry of Housing, Communities and Local Government data (H click)	Working with partners, district and borough councils in Herts, to understand the data collated on specific groups in their areas.	Consensus and agreement on method of data collation and integrity and reliability of data	All partners have confidence in the data being collated by boroughs and districts and data to be used to inform strategic decisions around service provision.	Sukhvinder Rai Ongoing – Sept 2020

This EqIA has been signed off by:

Lead Equality Impact Assessment officer:

Date:

Head of Service or Business Manager:



Date: 2 MARCH 2020

Review date: MARCH 2021

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

² **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?

³ **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.

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- 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](#)

⁴ **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](#)?

⁵ **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.

⁶ **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.

⁷ **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.

⁸ **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.

⁹ **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.

¹⁰ **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.

¹¹ **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).

¹² **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.

¹³ **Sexual Orientation:** The Act protects bisexual, heterosexual, gay and lesbian people.

¹⁴ **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?

¹⁵ **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.

¹⁶ **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.

¹⁷ **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.

¹⁸ **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.