Appendix E



Equality Impact Assessment (EIA)

Name of Policy or Practice	Children with Disabilities Strand - Families First Programme		
Head of Service responsible for the Policy or Practice	Geraint James		
Name of officer (s) completing impact assessment form	Paul Stevens		
Service	Children and Young People's Partnership Date of Assessment November 20		

EIA Completed by :		EIA Agreed	EIA Agreed by Head of Service :	
Date	10/01/2013	Date	10/01/2013	
Name(s)	Paul Stevens	Name	Geraint James	
Signature(s)	P. Stevens	Signature	G. James	

STEP 1 – Identify the Main Aims and Objectives of the Policy or Practice

1.	Wh	at is being assessed? (Please double click on the box and select 'checked' as appropriate to cross X)
		New and revised policies or practices
		New procedures (which modify service delivery or employment practices)
		Service review or re-organisation proposals which affect the community and/or staff
		Efficiency or saving proposals
		Setting budget allocations for new financial year
		Decisions affecting service users, employees or the wider community
		New project proposals affecting staff, communities or accessibility to the built environment, e.g., new
		construction work or adaptations to existing buildings
		Other please explain in the box below:
2. V	Vhat a	are the overall aims and objectives of the policy or practice ?
		First is an innovation programme that promotes the development by local authority areas of effective multi- systems and support, with a clear emphasis on prevention and early intervention for families, particularly

The main aims of the programme are to:

• act as a spur to local area system redesign and implementation;

those living in poverty. It is a Welsh Government Funded Programme.

• improve and innovate universal and other services to lead to better, measurable outcomes for families, particularly

those living in poverty;

- promote effectiveness, efficiency and improved long-term outcomes through an 'invest to save' approach, investing, particularly, in preventative and early intervention approaches;
- throughout the programme, encourage the development and sharing of learning about how best we can achieve the above and better support children and their families; and
- Using evidence from the above, see an increasing mainstreaming of activity in order to provide greater stability and longer-term planning.

The outcomes it aims to achieve are:

- 1 Working age people in low income families gain, and progress within, employment
- 2 Children, young people and families, in or at risk of poverty, achieve their potential
- 3 Children, young people and families are healthy, safe and enjoy well-being
- 4 Families are confident, nurturing, and resilient

Families with disabled children are an intrinsic part of the Families First programme; additional funding has been made available to ensure their needs are taken into account when services are being commissioned. To distribute this funding where it will have the greatest impact a steering group of experienced professionals working with Children with Disabilities has been assembled. Their decisions have the potential to impact upon current service users where projects are running already, hence the requirement for this Equality Impact Assessment.

3. Who is the policy or practice intended to help or benefit (stakeholders)?

Families First is intended to benefit families living in poverty and families with disabled children. This may also include families with an adult who has disabilities. Other groups who may benefit include children in families where one adult works part-time, workless and unemployed families, families with mothers who have no qualifications, people experiencing rural disadvantage, homeless families and young people, migrants and ethnic minorities (Save the Children, Child Poverty Impact Assessment). Research has showed that families who have Children with Disabilities may experience some or all of these issues; for example, the recent consultation for Families First

showed that there was a link between worklessness and unemployment where caring responsibilities for the child had become difficult to balance.

4. Who are the main consultative groups or communities of interest?

The Families First funding stream is administrated via the Children & Young People's Partnership, and managed via the Families First Programme Board. This includes representation at a Senior Level from services & organisations such as Education, Health, Youth Justice, Housing, and Revenues & Benefits. A steering group to manage the Children with Disabilities strand has been set up beneath the main programme board. This includes representation from key services working with children & young people who have disabilities (see service profile for the full membership). This group is provided with information by the Operational Group, a practitioner led group that also manages the funding for Social Services projects for Children with Disabilities. Terms of Reference to define the relationship between the two groups is currently being drawn, and a work programme for the strategic group defines their goals. This complex structure has the ultimate responsibility for managing relations, consultations etc with external stakeholders, communities of interest and service users.

The main external consultative groups and communities of interest are: Families living in poverty; families with disabled children or young people; the organisations that currently provide services to these groups. This latter group includes core services within Conwy County borough Council and external organisations including the voluntary sector. A full list can be seen in the Children & Young People's Partnership Children with Disabilities Service Profile.

STEP 2 - Consider Existing Information and What This Tells You

When completing this section, you need to consider if you have sufficient information with which to complete your EIA, or whether you need to undertake a period of engagement/consultation before continuing. The legislation relating to the EIA process requires you to engage and involve people who represent the interests of those who share one or more of the protected characteristics and with those who have an interest in the way you carry out your functions. This needs to be proportionate to the policy or practice being Equality Impact Assessed. You may have already recently undertaken consultation specifically on this policy or practice. Other officers within CCBC may have carried out engagement work which will be relevant to this EIA and you can review the Corporate Consultation Database to find out what engagement activities have taken place in Conwy and establish if this is relevant. If you have very little or no information from previous engagement that is relevant to this EIA, you should consider undertaking some engagement work with you stakeholders and with relevant representative groups to ensure that you do not unwittingly overlook the needs of each protected group.

5. What do you already know about the impact on each protected characteristic from your experience of current service delivery or previous engagement or consultation? You could refer to the Initial Equality Impact Assessment Screening Form and the Community Involvement Database.

Protected Group	Relevance of the policy / practice by protected characteristic
Race	The programme targets families living in poverty. In the UK overall children from minority ethnic group make up 15% of children (DWP, 2009) but 25% of children who are in poverty. According to the 2001 census, 2% of people in Conwy are from minority ethnic groups. Race therefore needs to be considered by the programme, although the actual numbers of children falling into this group are very small (approx 120) in comparison with the overall numbers of children living in poverty in Conwy (approx 4700).
	Families First research completed recently demonstrated that some of these families living in poverty have Children with Disabilities. It is difficult to estimate what proportion are from ethnic minorities although the Children with Disabilities voluntary register,

	explored in the recent service profile and included in the recommendations should go some way towards bridging this data gap.
Disability	There are around 13,000 families in the Conwy County Borough (HMRC, 2011), including 24,400 children aged 0 – 19 (Welsh Assembly Government, 2010) with approximately 3,300 families being one parent households (Conwy County Borough Council, 2012). Based on the statistic that 1 in 20 children in the UK live with chronic health conditions & neurodisabilities, this suggests that 1,200 of Conwy's 24,400 children may be living with such a condition.
	Children living with one or more disabled adults have a 30% chance of being in relative poverty (Save the Children, Child Poverty Fact Sheet). This equates to 380 disabled children in Conwy who may be living in relative poverty.
Sex	Women are slightly more likely to live in low-income households than men: 21% compared with 19%. This gap is small because there is no difference for between working age single women and men. The reason there is a gap is because most lone parents (a group at high risk of being in a low-income household) are women (The Poverty Site).
	In terms of linking this to Children with Disabilities, research explored in the service profile suggests that families who have one or more children with a moderate or severe disability are more likely to experience family breakdown. This can increase the likelihood of separation and lead to instances where there may be lone parents looking after a child with complex needs. Other undesirable alternatives could be that the child is taken into care at an out of county facility.
Age	The programme targets families with a child between 0-25; as such the disability strand looks specifically at people with disabilities in this age bracket. The justification is that Child poverty has a significant impact on children's outcomes as they grow up, for example, on (Save the Children, Child Poverty factsheet). Evidence suggests that the most effective interventions target the early years (Review on Poverty and Life

	Chances (Frank Field), 2010. The age of parents also has an impact on child poverty with children born to teenage mothers having a 63% higher risk of living in poverty (Save the Children, Child Poverty Fact Sheet).
Religion & Belief	Religion or belief have not been identified as a factor linked to child poverty, or as having a significant impact on children with disabilities. However, there could be scope to explore greater links with religious and faith communities for future information & consultation (please see recommendations).
Sexual Orientation	Recent consultation conducted with Lesbian, Gay, Bisexual, Transgender & Questioning (LGBTQ) young people didn't identify any specific issues around children with disabilities. However, it did identify that 5-7% of Conwy's children & young people may be LGBTQ, which is a significant proportion and therefore it is likely that an as yet unidentified proportion of these could include some with a physical and/ or mental disability.
Gender Reassignment	The recent LGBTQ survey was conducted on Lesbian, Gay, Bisexual, Transgender & Questioning young people and so included people in this group.
Marriage & Civil Partnership	No specific issues identified. Separation and divorce however were raised by interviews with families as 'trigger points' that lead to other difficulties within the family, and lone parent families are known to be more vulnerable to poverty. Family breakdown was also identified as a worst case scenario for a family who have a disabled child, by the Child & Adolescent Mental Health service. Providing support to families experiencing separation and divorce will therefore be a key part of the programme.

Pregnancy & Maternity	Another of the issues raised by families in the interviews conducted by the CYPP was domestic abuse. Thirty percent of domestic abuse starts in pregnancy, and existing abuse may get worse during pregnancy or after giving birth. This may impact upon mothers who have children with disabilities, although there is no data to suggest how prevalent this is. For a baseline, the recent Domestic Abuse Service Profile informs that an estimated 5,200 of Conwy's 95,000 adult population will have reported cases of Domestic Abuse in 2011; this equates to around 5%. The chances of a number of these instances involving families where there is a child or young person with disabilities are statistically fairly remote, but all the more likely when the Families First research is taken into account. In particular, this found that issues such as Family Breakdown, Domestic Abuse and difficulties with caring responsibilities i.e. looking after a child with disabilities, were all related and likely to impact upon each other.
Welsh Language	The programme will be delivering services to families and therefore needs to ensure that families can access the services in the language of their choice. Services to Children with Disabilities that are delivered bilingually has also been identified as a potential issue by the steering group, although the recent Service Profile undertaken by the CYPP did not find any evidence to confirm this. However, one recommendation was to work with the Welsh Language Officer to ensure services delivered with the Families First funding will be fully bilingual, in accordance with the Welsh Language Scheme.
Other (please state)	One of the main drivers of the Families First funding stream is the Welsh Government's Child Poverty Strategy. Whilst it is referenced broadly throughout, it is important to maintain a specific focus on the effect that poverty can have in terms of limiting access to available services. This is particularly apparent where there are Children with Disabilities; for example, the service profile highlighted cases where families living in rural areas and eligible for services on the coastal belt were unable to physically access them due to logistical hurdles connected to income, such as transport.

6. Summarise the additional relevant data, research and performance management information you already have:

Data / Information Examples In order to develop the programme we have conducted in-depth interviews with families. Initial EIA Screening including some who had Children or Young people with Disabilities. Complaints Compliments Service User data The sample included: mothers (n=31), fathers (n=10) and siblings (n=1); eight of the interviews had both parents present; families residing in rural (n=9) and more urban/coastal Service User Feedback (n=24) areas; a mix of housing situations such as families living in social housing (n=22). Inspections or Audits private rented accommodation (n=7), and owned homes (n=4); various employment status - at the time of the study, 12 households had neither parent in paid employment; 9 households had at least one parent in paid employment, and 13 households had one or both parents as full-time carers of their child with a disability; various family make-ups, including single parents (n=13), and a wide variety in terms of the number of children, and children's ages (early years, primary aged, teens, and grown up children); families who have moved into Conwy from other counties (from within and outside of Wales) (n=18); families with children with disabilities, including physical and learning disabilities (n=13); and families who use a high number of services, ranging to those who are in receipt of a low number services. This data was then analysed along with other quantitative data collected and the results of other consultations conducted by the CYPP team. This identified key themes for the programme. Service profiles were then carried out on each of these themes, including mapping existing services (including availability for equalities groups) and interviews with professionals about gaps or duplication in current services. This is where the Children with Disabilities Service Profile derived from, and has since been completed for the Family Support Programme board, and Children With Disabilities Steering Group. The partnership's Participation Team has also undertaken consultation and participation work which has informed the development of the programme. We have also used performance monitoring data collected by the CYPP Team.

Research or Comparative Information	Examples
Specific research work that informs the development of the programme includes:	Service User Surveys Studies by Governmer
 In-depth interviews with vulnerable families (including those who have a child with disabilities) 	departments or professional bodies
 Analysis of administrative datasets that provide indicators of a families' vulnerability 	Census data
Parent survey & parenting consultation event with professionals.	Service based projects
Children and Young People's Plan Consultation	and research
 Service profiles (including interviews with professionals and collation of relevant consultation data and needs assessments). Specifically one on Children with Disabilities, but also relevant are the profiles on family breakdown, domestic abuse, early years, LGBTQ young people, drug & alcohol support services, maternal mental health. CYPP Performance monitoring information 	How Fair Is Wales (EHRC data)
 National data and research by organisations such as Save the Children and the Poverty Site. 	
 Child poverty indicators (produced by the Corporate Research & Information Unit) 	
 Cordis Bright mapping of vulnerable families in neighbouring local authorities 	
Two Families First visioning days with professionals	
 Information provided by the Grant Steering Group (Social Services Directorate) on grant spending/ programmes and services being funded in Conwy for Children with Disabilities 	

7.	Have you complied with the duty to Engage as described at the start of this section and are you sufficiently informed to proceed?					
	Yes No (please cross as appropriate X) If Yes, please proceed to Step 3					
	If No, you may wish to consider pausing at this point while you undertake engagement activities (which you should add to your action plan – Step 6). Please incorporate any information you have obtained from this additional activity in the box below and state what the key findings were:					
STEP 3 - Procurement and Partnerships						
desig funct	public sector General Duty means all public authorities need to consider the needs of different groups when gning and delivering public services. This duty also applies to private sector organisations who deliver a public ion on our behalf and we need to ensure that those organisations exercise those functions by ensuring our urement and monitoring of those services complies with the General Duty.					
8.	Is this policy or practice to be carried out wholly or partly by contractors or in partnership with another organisation(s)?					
	Yes No (please cross as appropriate X) If No, please proceed to Step 4					

9. If yes, how will you comply with Equality, Human Rights and Welsh Language Legislation? Think about:

Procurement

- Setting out clear equality expectations in Tendering and Specification documentation
- On what you based your decisions in the award process
- That contract clauses cover legislative equality requirements
- Performance and Monitoring measures are included to monitor compliance

Partnerships

Who is responsible for:

- Equality Monitoring relevant data
- Equality Impact Assessment
- Delivering the actions from the EIA
- Ensuring that equality, human rights and Welsh Language legislation is complied with by all partners

The projects will mainly be delivered by a mix of public sector and voluntary organisations and will be contracted either through awards of grants or through a procurement process. Our current procedures require organisations to have a Welsh Language Policy and Equal Opportunities Policies in place and that staff / volunteers have access to copies and are appropriately trained. We also ask for specific information about how projects support families, children or young people in or at risk of poverty; or, disabled children and young people, or families where there is a disabled child. Where appropriate we ask for additional information about how the needs of particular groups will be met, for example, when commissioning parenting programmes we ask for additional information about how fathers would be targeted because our research has shown that take-up of parenting programmes tends to be lower for fathers. Reporting is through 6 monthly report cards which include information about how much the project has done, how well, and whether it has made a difference along with feedback from service users. These are developed between the provider and the commission and include equalities data where appropriate. The CYPP team also deliver training for projects in performance management which includes a strong focus on the importance of participation and consultation.

The programme involves developing and piloting new and innovative approaches, which means there are times when projects will come to an end and need to be decommissioned. An impact assessment tool has been developed by the partnership which will assess the impact of project closures and suggest ways to mitigate this impact.

STEP 4 - Assessing the Impact

10. Is there any evidence of higher or lower take-up or satisfaction by any group(s), and if so, how is this explained?

Families who have a child or young person with disabilities are being targeted specifically with this strand of the funding stream. Overall there should be higher take-up of the programme from those groups who are at greater risk of child poverty, and the Welsh Government sees that families with a disabled child are a particularly high risk group.

11. Does the geography or demography of any groups reveal anything?

Research into the geographical distribution of vulnerable families in Conwy conducted by the CYPP team identified small clusters of poverty in the rural area that are not easily identified by other measures such as the Welsh Index of Multiple deprivation. The programme therefore includes a Rural Families First element which targets vulnerable families.

Rural Families First and other service providers working away from the more urbanised coastal belt were also consulted for the Children with Disabilities Service Profile in order to explore some of the issues affecting rural families who have a disabled child, and how these can be alleviated. It was documented that provision in rural areas to this group is more sparse and of a lower quality in some instances. Furthermore, due to the difficulties faced by families who have a disabled child (transport was identified as one issue), the lack of provision in rural areas can have a disproportionate impact. For example, if they are unable to access services on the coastal belt such as respite, leisure and play opportunities, the lack of respite and opportunity can lead to the onset of more complex problems in the family.

12. Do any rules or requirements or the way the policy or practice is delivered prevent or reduce the likelihood of any groups from use or access or are any other barriers created for them?

Eg: due to limited income, location, times of availability, access to buildings, information or language, eligibility rules, dress code, cultural issues

Removing barriers to the accessibility of services is one of the key aims of the Families First programme, particularly the Team Around the Family project. We consulted specifically on the barriers that families face when accessing services and identified the following: transport (cost and availability); lack of qualifications, education and skills; disability; service-specific barriers such as stigma associated with support; access to clear information; poor health; cultural factors; caring responsibilities and a lack of appropriate childcare. When commissioning services we ask specific questions about how the project will ensure that these barriers will be overcome. The programme specifically targets families, children or young people in or at risk of poverty; **or**, disabled children and young people, or families where there is a disabled child.

With regard to the disability strand, a more specific focus specifically on this group (i.e. children and young people with a disability) focuses on providing greater access to services that are available, and will ensure that any new services or projects commissioned will be accessible and available.

13. Can any of these limitations be justified on the grounds of advancing equality of opportunity or fostering good relations between those who share a protected characteristic and those who do not?

Limiting the scope of the programme to families, children or young people in or at risk of poverty; **or**, disabled children and young people, or families where there is a disabled child is designed to promote equality of opportunity for these groups. Furthermore, where there is limited funding available it is justifiable that this should be focussed where it will have the greatest impact, and where it is most needed.

14. Do any of these limitations amount to unlawful discrimination?

Yes (pleas	Cross	No as app i	⊠ opriate	Not Sure]	
protected	d group(s) it appli	es to an	1	e table below, which n why (including likely	

Race	Black Minority Ethnic
	groups
	Gypsies / Travellers
	Language
Disability	Mobility
	Dexterity
	Blind or Visually
	impaired
	Deaf or Hearing

	impaired Mental Health Learning Disabilities
Sex	Men Women
Age	Older People Children Young People
Religion & Belief	Faith communities
Sexual Orientation	Gay Lesbian Bi-sexual Heterosexual
Gender Reassignment	A person who proposes to, starts or has changed his or her gender
Marriage & Civil Partnership	
Pregnancy & Maternity	
Human Rights	Right to Education, Private and Family Life, Protection of property, etc
Welsh Speaking Communities	
Other socially excluded groups or communities (please state)	

15. If you answered No to Question 13, do the barriers and limitations amount to a differential impact for certain groups?
Yes ⊠ No □ Not Sure □ (please cross as appropriate X)
16. If you answered Yes or Not Sure to Question 14, please give details in the box below and explain why
The programme will have a differential impact for certain groups including Children with Disabilities, but this is by design in order to promote equality of opportunity for the groups disadvantaged by disabilities.
17. Do you have enough information to make an informed judgement?
Yes No [(please cross as appropriate X) If you answered Yes, please justify:
The CYPP has a joint commissioning strategy and toolkit which sets out how services will be commissioned to meet local needs. This has been followed in order to establish which services will be commissioned through the disability element of the Families First Programme. It included: extensive qualitative research with vulnerable families including families of children with disabilities; data collection; participation work with children with disabilities undertaken by the children with disabilities team; consultation with professionals; service profiles to map current service provision and to identify best practice and any gaps in provision. The decommissioning process has also been followed and projects have been asked about the impact of closing the project on service users including any adverse effect on protected groups. A multi-agency group has been overseeing the decommissioning/recommissioning process including representation from the voluntary sector to ensure it is an open and transparent process where different needs are considered.
If you answered No, what information do you require about protected groups? Information is already available.

18. Is it possible to get the information needed quickly and easily, or should data collection be included in the action plan? Please give details below:

<u>STEP 5 – Dealing with Adverse or Unlawful Impact and Strengthening the Policy or Practice</u>

In this section, you will consider whether there are any measures to reduce or remove any adverse impact. You should also explore other ways of achieving the same goal and / or alternative means of delivering a service to meet the needs of different groups.

19. What measures can you introduce to the policy or practice which could reduce or remove any unlawful impact or disadvantage?

No unlawful impact or disadvantage

- 20. What measures could be included to strengthen the policy/practice and foster good relations and advance equality of opportunity?
- Check projects are recording relevant equality information as part of their performance measurements.
- Continue to work through the decommissioning process to ensure all the appropriate measures are in place to support vulnerable service users.
- Provision in rural areas should be considered, particularly around services that are not statutory and those that
 provide play, leisure and sport opportunities. Interviews suggest there is less variety and quality of provision than in
 coastal areas. Furthermore, the logistical issues that are faced by families in accessing services ordinarily are
 compounded by the isolation and distance.
- Multi-agency working: The Children with Disabilities Service Profile can be circulated so that organisations are made aware of each other. This could be perhaps supported by the provision of more networking opportunities with a focus on how to work together more, against the current backdrop of efficiencies.

The	pro	iects	are	a	Iread	٧	workin	q	to:
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- Provide inclusion training for staff to embed support for children with disabilities
- Embed participation of children with disabilities within their projects
- Consultations should be ongoing, and ensure to include representation from all the stakeholders that need to be involved. For example, due regard should be given to the inclusion of equality groups in the consultation process, for example the North Wales Race Equality Network and the Wales Interfaith Network.

Actions are outlined in Step 6	Actions	are	outlined	in	Step	6
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21. What actions could you take to achieve the same goal by an alternative means?	

STEP 6 - Action Plan

Please outline below the actions you will take to progress your proposal. These might involve carrying out additional Engagement/Involvement activities, collecting Equality data where this was not readily available to help with this EIA, undertake data analysis from future data obtained to monitor the impact of this policy/practice on an ongoing basis, any actions you need to take to ensure procurement complies with the General Duty, any arrangements you need to put in place to monitor and review the impact of this policy/practice in future, and so on.

Action	Measure of Success	Timeframe	Lead Responsibility	Add to Service Plan (✓)
Actions to be taken before EIA and policy	/practice can be s	igned off		
Continue to work through the decommissioning process to ensure all the appropriate measures are in place to support vulnerable service users.	Agreed at meeting 04/12/12 to continue current projects so decommissioning won't take place.			
Actions after EIA and policy/practice sign	ned off			
Check projects are recording relevant equality information as part of their performance measurements.	Checked at meeting 04/12/12 – some projects already recording.			

STEP 7 – Decision To Proceed

22. Using the information you have gathered in steps 1-5 above, please state on the table below whether you are able to proceed with the policy or practice and if so, on what basis?

(please cross as appropriate X)

	Decision	Action
☐ Yes	Continue with policy or practice in its current form	Complete the Monitoring and Review section (Step 8) to ensure the outcomes are monitored and regularly reviewed
⊠ Yes	Continue with policy or practice but with amendments for improvement	Complete Action Plan and Monitor and Review sections (Steps 6 & 8) to continually assess impact
☐ Yes	Continue with policy or practice but with amendments to remove any areas of adverse impact as identified in Step 5	Complete Action Plan (Step 6) to address any areas of adverse impact and Monitor and Review (Section 8) to continually assess impact
☐ No	Abandon this policy or practice as it is not possible to address the adverse impact, and consider alternative ways of addressing the issues	Complete Action Plan to address any issues resulting from abandoning policy and to deal with the adverse impact identified

STEP 8 – Arrangements for Monitoring and Review

The EIA process is an ongoing one that doesn't end when the policy/practice and EIA is agreed and implemented. There is a specific legal duty to monitor the impact of policies/practices on equality on an ongoing basis.

23. Please outline below what arrangements you will make to monitor and review the ongoing impact of this policy or practice:

Monitoring and Review arrangements (including where outcomes will be recorded)	Timeframe & Frequency	Lead Responsibility	Add to Service Plan (✓)
Monitor & Review arrangements will reflect those adopted by the Family Support Programme Board and the Welsh Government, which is to utilise Results Based Accountability. This will ensure regular updates on outcomes and indicators relating to the project are provided so as to determine the project's performance, whether it is meeting agreed outcomes, and to provide information such as how many people are receiving a service. In addition to this, the group is keen to add an additional layer of quality assurance by visiting and advising projects to add to the report card information.			

STEP 9 – Publishing the Equality Impact Assessment

Please arrange for this completed EIA to be agreed by your Head of Service, refer to the EIA Policy regarding publishing arrangements and return a copy to the HR and Equality Officer.