

Appendix E

Equality Impact Assessment (EIA)

Name of Policy or Practice	Families First Programme		
Head of Service responsible for the Policy or Practice	Geraint James		
Name of officer (s) completing impact assessment form	Sarah Bartlett		
Service	Children and Young People's Partnership (Education)	Date of Assessment	October 2012

EIA Completed by :		EIA Agreed by Head of Service :	
Date	20/11/2012	Date	29/01/2013
Name(s)	Sarah Bartlett (based on discussions at the Family Support Programme Board)	Name	Geraint James
Signature(s)	S. Bartlett	Signature	G. James

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

1. What 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, eg, new construction work or adaptations to existing buildings
- Other please explain in the box below :

2. What are the overall aims and objectives of the policy or practice ?

Families First is an innovation programme that promotes the development by local authority areas of effective multi-agency systems and support, with a clear emphasis on prevention and early intervention for families, particularly those living in poverty. It is a Welsh Government Funded Programme.

The main aims of the programme are to:

- act as a spur to local area system redesign and implementation;
- 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 increase in 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

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

Families living in poverty and families with disabled children or young people. A number of groups have been identified as being most vulnerable to Child Poverty which includes: lone parent families, families with large numbers of children, families with an adult who has disabilities, children in couple 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). The programme aims are to have positive impact on disadvantaged groups.

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

Families living in poverty and families with disabled children or young people and the organisations that currently provide services to these groups.

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). The programme will therefore focus on targeting those families experiencing poverty and disadvantage and ensuring services are accessible to all rather than targeting families because of their race. Consultation undertaken at the North Wales

	<p>Race Equality Joint Involvement Event suggested that language was one of the main barriers to BME groups accessing services particular to some members of this protected group.</p>
Disability	<p>Children living with one or more disabled adults have a 30% chance of being in relative poverty (Save the Children, Child Poverty Fact Sheet). Research carried out by the Children's Society (2011) found that four in 10 disabled children in the UK live in poverty compared to one-in three children in the population as a whole. There is a risk that welfare reform will worsen the situation. The Families First programme includes projects to support families through welfare reform and also to support parents of disabled children and young people into work. For example, our research identified specific difficulties for parents of disabled children and young people to accessing employment, for example, because a need for flexible hours. Supporting parents to re-skill so that they can access employment opportunities that better meet their needs is one way that these barriers can be overcome.</p> <p>The draft Conwy Young Carers Strategy states that 'Young Carers can miss out on many everyday activities, such as playing, school, socialising with friends or relaxing, and the physical and emotional pressures they face can sometimes lead to: educational difficulties, bullying, limited opportunities horizons and aspirations; missing out on social, cultural and leisure activities; difficulties in being understood by peers leading to restricted friendships; Isolation and social exclusion; 'stigma by association' related to physical disability and mental health; fear of professionals; health and emotional difficulties; unexpected and early rise to adulthood often resulting in difficulties in transition to adulthood; low expectations..</p> <p>The programme therefore has a specific disability strand as well as guidance stating that families with disabled children and young people and those with young carers must be an intrinsic part of the programme. A full Equalities Impact Assessment has been carried out on the disability strand of Families First.</p>
Sex	<p>Women are slightly more likely to live in low-income households than men: 21%</p>

	<p>compared with 19%. This gap is small because there is no difference 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). As the programme is targeting child poverty this is a group that will be targeted by the programme. We know from experience of delivering parenting programmes that the majority of participants are women.</p>
Age	<p>The programme targets families with a child between 0-25. Child poverty has a significant impact on children's outcomes as they grow up (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).</p>
Religion & Belief	<p>The Equality and Human Rights Commission Research report 73 on Religious discrimination in Britain identifies the difficulty in establishing where religion is a factor in disadvantage. There is some evidence from studies that "found that Census data reveals that Muslim people are particularly vulnerable in terms of unemployment, life-limiting long-term illness, educational levels, and housing conditions". However they also identified that much of this disadvantage may be attributed to ethnicity, culture and social class rather than religion specifically. There are approximately 600 Muslims in Conwy, which is around 0.5% of the total population. The focus of the programme therefore on social class i.e. targeting families experiencing disadvantage will be a more effective way of challenging disadvantage in Conwy than focussing on particular religious groups. The projects will still need to ensure that discrimination is not occurring (see question 10 for details).</p>
Sexual Orientation	<p>A recent consultation with LGBTQ young people undertaken by the CYPP team a number of the young people identified a fear of becoming homeless, something which had happened to friends of theirs due to non acceptance from parents of their sexuality. This needs to be taken into account when looking at the housing theme of the Families First programme and the CYPP through Core Aim Group 5 who are working on the</p>

	<p>issues raised by this consultation. Research on LGB parenting suggests that outcomes for children and young people are not affected by the sexual orientation of their parents (see Equalities and Human Rights Commission Sexual Orientation Research Review). However there is some evidence that gay fathers often felt isolated as parents and ‘that professionals may still require guidance on how to respond appropriately to LGB people and their families and that discrimination still exists against same-sex couples and LGB people in some areas of family policy and practice’.</p>
Gender Reassignment	<p>Issues similar to sexual orientation above. The background and research paper produced by North Wales public sector organisations to support Equalities plans identified that greater understanding was needed in relation to the needs of transgender services users and improvement in the take-up of health screening.</p>
Marriage & Civil Partnership	<p>Of the total population of Conwy 48% are married and 0.2% are in a registered same sex civil partnership (approximately 200 people). No specific issues have been identified relating to these groups and child poverty. 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. Providing support to families experiencing separation and divorce will therefore be a key part of the programme.</p>
Pregnancy & Maternity	<p>Another of the issues raised by families in the interviews we carried out was domestic abuse. Thirty percent of domestic abuse starts in pregnancy, and existing abuse may get worse during pregnancy or after giving birth. The programme will be developing projects under the theme of domestic abuse and will take this into account.</p> <p>There is a known link between teenage pregnancy and child poverty which has led to Welsh Government including the rate of teenage conceptions as one of the indicators for the programme. The Families First Action Plan includes information about initiatives in Conwy to reduce the rate of teenage conceptions.</p>
Welsh Language	<p>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 in accordance with the Welsh Language Scheme.</p>

Other (please state)	Looked-after children and young people. The aims of the programme are to improve health, education and economic outcomes for children, young people and families. Looked-after children and young people tend to have worse outcomes in respect of these aims than the general population. As a preventative programme, Families First will target families who don't meet Social Services eligibility criteria. However the Family Support Programme Board have agreed not deny Families First services to families known to Social Services where they are appropriate. The programme won't provide services that duplicate statutory services, but will take a flexible approach to eligibility criteria to ensure the needs of families are met.
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6. Summarise the additional relevant data, research and performance management information you already have:

Data / Information	Examples
<p>In order to develop the programme we have conducted in-depth interviews with families. 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 (n=24) areas; a mix of housing situations such as families living in social housing (n=22), 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</p>	<p>Initial EIA Screening Complaints Compliments Service User data Service User Feedback Inspections or Audits</p>

<p>availability of Welsh Language services and disabled access to services) and interviews with professionals about gaps or duplication in current services. 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.</p>	
<p>Research or Comparative Information</p>	<p>Examples</p>
<p>Specific research work that informs the development of the programme includes:</p> <ul style="list-style-type: none"> • In-depth interviews with vulnerable families • Analysis of administrative datasets that provide indicators of a families' vulnerability • Parent survey & parenting consultation event with professionals. • Children and Young People's Plan Consultation • Service profiles (including interviews with professionals and collation of relevant consultation data and needs assessments) of family breakdown, bereavement, domestic abuse, early years, LGBTQ young people, maternal mental health, drug and alcohol and children with disabilities. • CYPP Performance monitoring information • National data and research by organisations such as the Equality and Human Rights Commission; 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 	<p>Service User Surveys Studies by Government departments or professional bodies Census data Service based projects and research How Fair Is Wales (EHRC data)</p>

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

The public sector General Duty means all public authorities need to consider the needs of different groups when designing and delivering public services. This duty also applies to private sector organisations who deliver a public function on our behalf and we need to ensure that those organisations exercise those functions by ensuring our procurement 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 these.

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?

Overall there should be higher take-up of the programme from those groups who are at greater risk of child poverty as listed above. There is also a higher take-up of parenting programmes by women. Research by Children in Wales, Parenting UK and the Fatherhood Institute suggests that this may be due to the way courses are marketed and presented. Also the language used – people often think that ‘parents’ refers to ‘mothers’, so it’s recommended that the term ‘mothers and fathers’ is used instead. Many parenting practitioners are also women, which may make fathers less comfortable in the environment as well as cultural barriers.

There is some evidence nationally that LGBT parents may experience discrimination when accessing services although it is difficult to gather evidence locally about whether this is an issue. All projects funded by the programme are required to target families experiencing poverty, ensure their services are accessible, have equalities policies in place and staff trained to comply with them, and to ensure that service users are involved in developing the project. These measures will help to identify and address any discrimination taking place.

There is also evidence that there may be additional barriers to accessing services for families who do not speak or understand Welsh or English.

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.

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 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. This does exclude anyone who doesn't fall under either of those categories, except for times when it is considered that the service will target these groups more effectively by broadening the scope of the project so that a service doesn't become stigmatising for example.

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.

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

Yes No Not Sure
(please cross as appropriate X)

If you answered Yes or Not Sure, please state on the table below, which protected group(s) it applies to and if possible explain why (including likely impact or effects of this proposed change):

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 but this is by design in order to promote equality of opportunity for the groups disadvantaged by child poverty and/or disability.

17. Do you have enough information to make an informed judgement?

Yes No **(please cross as appropriate X)**

If you answered Yes, please justify:

If you answered No, what information do you require about protected groups?

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:

STEP 5 – Dealing with Adverse or Unlawful Impact and Strengthening the Policy or Practice

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?

None needed – will continue with current good practice around consultation & participation, procurement and monitoring to try to prevent unlawful impacts.

20. What measures could be included to strengthen the policy/practice and foster good relations and advance equality of opportunity?

Improve access by fathers to parenting programmes was a key part of our current parenting programmes contract which the service provider has met by providing a dad's only group. We will include similar measures when the new service is commissioned from April 2012. Examples of best practice at including fathers are included in our commissioning plan as follows:

Best practice in involving fathers

(Children in Wales, 2008; Burgess, 2010 & Fatherhood Institute, 2009)

- Careful use of language: use 'mothers and fathers' rather than 'parents' (UK Government, Aiming High for Children: supporting families, 2007)
- Multi-agency working: services should signpost to other services for fathers when they cannot provide them alone; strategies for engaging fathers should be included in parenting strategies
- Embed inclusion of fathers into services: provide appropriate training for staff
- Positive father involvement: promote use of Positive Parenting techniques
- Participation, speaking and listening: find out what fathers want or need from services
- Leaflets and information: design with fathers in mind
- Assessment and data collection: include information about fathers and specifically invite them to meetings

The programme will also focus on supporting parents who are separating and divorcing as lone parents (the majority of whom are women) are at a high risk of being in low-income households.

Consultation and participation work undertaken to develop this project included men and women, disabled people, children and young people, LGBTQ young people, people from urban and more rural areas, people with different employment statuses, families who used a high number of services and families who used a low number of services. The aim was to focus on families who experience disadvantage due to poverty or disability. As a result, not much data has been gathered on the specific experience of BME groups, particular religious groups, LGBT parents and parents who have undergone gender reassignment in the county. This is something that could be addressed in the ongoing research and participation strand of the project. However, there are challenges involved in identifying families who are members of these minority groups and also experiencing disadvantage due to poverty and/or disability. In the meantime, the processes that projects are required to have in place will help to promote equality of opportunity. The processes include having equalities policies in place and staff who are fully trained in them; targeting services towards families experiencing disadvantage; and conducting regular consultation and participation with service users.

Other measures that will be developed to strengthen the programme include: ensuring that projects are aware of translation facilities to ensure services are accessible to those whose language is not Welsh or English; asking projects to collect equalities monitoring information where appropriate as part of their performance monitoring; collecting equalities data as part of the service profile process; ensuring that information about services is accessible i.e. in plain English and available in alternative formats.

Throughout the cycle of the five-year programme new projects will be commissioned and existing projects de-commissioned or mainstreamed in order to meet the current needs of the programme. The partnership has a Joint Commissioning Strategy and process to manage the changes available on our website here: <http://www.conwy.gov.uk/doc.asp?cat=7959&doc=27460&Language=1>. Decisions are made based on detailed needs assessments and service profiles. Projects are required to complete an 'impact assessment' when at risk of closure, which includes questions about specific impacts on equalities groups. In addition, equalities impact assessments screening will be undertaken when decisions are being made about project closures and full equalities impact assessments undertaken as required.

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 signed off				
Carry out an EIA on the disability strand	EIA completed	EIA signed of by HoS 10/01/2013	Paul Stevens	
Add collection of equalities data to Service Profile PID template	Added to template	Completed	Sarah Bartlett	
Actions after EIA and policy/practice signed off				
Ensure that projects are aware of translation facilities to ensure services are accessible to	Email to projects	By April 2013	Sarah Bartlett	

those whose language is not Welsh or English				
Ask projects to collect equalities monitoring information where appropriate as part of their performance monitoring	Provide in information to projects	From April 2013 onwards	Sarah Bartlett	
Ensure that information about services is accessible i.e. in plain English and available in alternative formats	Provide in information to projects	From April 2013 onwards	Sarah Bartlett	
Carry out EIA screening on projects at risk of closure.	EIA screening tool completed	At FSPB meeting on 29/01/2013	Sarah Bartlett	

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
<input type="checkbox"/> 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
<input checked="" type="checkbox"/> 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
<input type="checkbox"/> 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
<input type="checkbox"/> 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 (✓)
The EIA will be reviewed by the Family Support Programme Board.	After 6 months initially and the annually	Sarah Bartlett	✓

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.