

Appendix E



Equality Impact Assessment (EIA)

Name of Policy or Practice	Social Care Transport Policy (Revised 2016)		
Head of Service responsible for the Policy or Practice	Claire Lister		
Name of officer (s) completing impact assessment form	Ramona Murray / Marian Hankin / Neil Anthony / Simon Griffiths		
Service	Integrated Adult & Community Support	Date of Assessment	17/11/2016

EIA Completed by :		EIA Agreed by Head of Service :	
Date	17/11/2016	Date	29/11/16
Name(s)	Ramona Murray / Marian Hankin / Neil Anthony / Simon Griffiths	Name	Claire Lister
Signature(s)		Signature	

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 ?

The policy aims to provide a consistent and robust process for applying a reliable, fair and equitable approach to the assessment of eligibility for assistance with transport.

Applying the principles of the Social Services & Well-Being (Wales) Act 2014 to this process and ensuring that we adhere to the new Statutory duties in relation to assessment, eligibility and meeting needs; whilst also considering the importance of promoting Citizens' Independence and considering the future sustainability of Social Care Services being provided.

The objective of the policy is to ensure that Citizens who are assessed as eligible to receive assistance with transport, receive a Service which meets their needs.

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

All Citizens who may have a need for assistance with transport to access Services, provided to meet their assessed eligible needs. This will include current and future Citizens / Service Users.

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

Learning Disability Connect Forum
Conwy Connect for Learning Disabilities
Conwy Participation Network
Cyng Wyn Ellis Jones, Cabinet Member for Children's Services, Education and Skills
Cllr Sue Lloyd-Williams, Cabinet Member for Housing, Social Care and Health

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 Community Involvement 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 your 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
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Race	<p>The most robust source of data for ethnicity at Local Authority level is the 2011 Census. White British is the largest group by far and is of a similar proportion within the total population to the National figure.</p> <p>White British makes up 95.4% of the population of the Conwy County Borough, which is a higher percentage than for Wales as a whole (93.2%).</p> <p>There are currently 2 Service Users accessing in-house transport from other Ethnic Groups (that are non White British). The types of issues which need to be considered, are preferences based on Ethnic backgrounds / beliefs. The new eligibility and assessment process, which is outlined in the revised Policy and based on Legislative requirements under the Social Services & Well-Being (Wales) Act 2014, will ensure that these varied needs are considered as part of the assessment process.</p>
Disability	<p>Whilst there is no comprehensive source of data about Disability, the 2011 Census provides information on limiting long-term illness and unpaid Carers within Conwy. There is a register of Physical and / or Sensory Impaired people and people with Learning Disabilities. However, this only captures those who are open to Social Services and use the Council's Services.</p> <p>People with Disabilities do experience significantly greater difficulties in accessing services, for example due to availability of public transport, accessibility of that transport; an individual with a learning disability may not be able to use public transport because of behaviours that could place themselves and others at risk; an older person may not be able to get to their local bus stop because of declining mobility, etc.</p> <p>Currently we have 153 people with a Disability being supported with transport: either in-house transport; commissioned taxi's; or payments to independent agencies to provide transport to their day services.</p>
Sex	<p>The size of the resident population in Conwy County Borough at 30 June 2014 was estimated to be 116,300 people. Just over half of these were women. Population data which includes gender breakdown is produced every year and is available at small area level. It is possible to use this data widely as a denominator for many indicators, as it is robust data with official National Statistic status.</p> <p>51.5% of the total population in Conwy are female, in comparison to 48.5% of males.</p>

	<p>Currently we have 102 females and 83 males being supported with transport: either in-house transport; commissioned taxi's; or payments to independent agencies to provide transport to their day services.</p>
Age	<p>The median age (the age at which half the population is older and half is younger) of Conwy County Borough's population is 47 years. The current median age for Wales is 41 and 38 for the UK. This means our population is significantly older than for Wales and the UK as a whole. The median age has increased from 44 to 47 years over the last decade.</p> <p>Those aged 16-64 make up 57.5% of Conwy's population, 65 plus is 26.2% and 85 plus is 4%.</p> <p>Older people do experience significantly greater difficulties in accessing services, for example due to availability of public transport or accessibility of that transport; an older person may not be able to get to their local bus stop because of declining mobility etc.</p> <p>Currently we have 46 older people (may be additional people within the Disabilities figure who also fall in to the older people category) being supported with transport: either in-house transport; commissioned taxi's; or payments to independent agency to provide transport to their day service.</p>
Religion & Belief	<p>The only reliable source of data about religious affiliation is the 2011 Census. The data shows that 'Christian' is the main religion in Conwy, making up 64.7%, with the next highest being 'no religion' (26.1%).</p> <p>Things that may need to be considered, based on Religion or Belief, may be for example a Muslim Lady, not wishing to be transported by a Male Taxi driver. However, these considerations would be discussed with the Citizen's during the assessment process and therefore alternative options could be considered and Co-Produced with the Service Users.</p>
Sexual Orientation	<p>Statistics about sexual identity are not available at Conwy CB level. The Integrated Household Survey which is produced by the Office for National Statistics does produce estimates at an all-Wales level,</p>

	<p>but data are not released for Conwy CB as they are sample based and not considered robust (the sample size is too small to be representative).</p> <p>This is a sensitive issue. Some people will not be happy to share information about their sexual identity and the inclusion of questions about this can put people off answering surveys. However, if it was relevant this would be dicussed on and individual basis as part of the assessment process.</p>
Gender Reassignment	<p>It is not possible to provide information in relation to those individuals currently in receipt of services who have undergone gender re-assignment and although it may be relevant in relation to the policy, this would be dicussed on and individual basis as part of the assessment process.</p> <p>No data about people who are transgender is currently available at unitary authority or national level.</p>
Marriage & Civil Partnership	<p>It is not possible to provide information in relation to those individuals currently in receipt of services who are married or in a Civil Partnership and although it may be relevant in relation to the policy, this would be dicussed on and individual basis as part of the assessment process.</p>
Pregnancy & Maternity	<p>It is not possible to provide information in relation to those individuals currently in receipt of services who are Pregnant or on Maternity and although it may be relevant in relation to the policy, this would be dicussed on and individual basis as part of the assessment process.</p>
Welsh Language	<p>The 2011 Census is the most reliable and detailed source for data on Welsh speakers. It states that 27.4% of the population aged 3 years old or over are Welsh speakers – considerably higher than the all-Wales figure of 19.0%.</p> <p>The Social Services & Well-Being (Wales) Act 2014, which this Policy has been based on, strenghtens the need for Citizens to be offered a service in the langauge of their choice. There is also the concept of the 'Active Offer' in relation the the Welsh Langaue Standards, this would be dicussed on and individual basis as part of the assessment process..</p>

Other (please state)	N/A.
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6. Summarise the additional relevant data, research and performance management information you already have:

Data / Information	Examples
Initial EIA Screening Equalities Statistics Research Bulliten - Corporate Research & Information Unit (April 2015) Conwy's Strategic Equality Plan 2016-2020 Service User feedback	Initial EIA Screening Complaints Compliments Service User data Service User Feedback Inspections or Audits

Research or Comparative Information	Examples
2011 Census Data Office for National Statistics Equality Impact Assessments in relation to Transport from other Local Authorities How Fair is Wales?	Service User Surveys Studies by Government departments or professional bodies Census data Service based projects and research How Fair Is Wales (EHRC data)

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

N/A

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?

The policy will impact on all groups as it will be applied to all adults who are assessed as eligible for Social Care services, who may require transport to access those services. Any individual issue including those related to protected characteristics that have an impact on a person's ability to get to and from services will be assessed as part of the process. The purpose of the policy is not to disadvantage i.e. should a person not be able to use their own resources there is a clearer route than previously to assistance. However it is predominantly people with Disabilities and Older People who access support with transport. This is because it is these groups that predominantly access day service provision and community support.

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

A significantly higher proportion of the population live in the coastal area where they are better served by public transport. Transport links in the rural area will have an impact on an individual's ability to utilise their own community resources and maintain their independence from managed support provided by the authority by travelling on public transport. The purpose of the policy is not to disadvantage any individual regardless of where they live. Should a person not be able to use their own resources there is a clearer route than previously to assistance which is based on the statutory requirements for assessment / eligibility and meeting need set out in the Social Services & Well-Being (Wales) Act 2014. The four steps approach to assessment in the policy will mitigate the risk/s of any adverse impact, in particularly in relation to people with Disabilities and Older people.

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

The purpose of the policy is not to disadvantage i.e. should a person not be able to use their own resources there is a clearer route than previously to assistance which is based on the statutory requirements for assessment / eligibility and meeting need set out in the Social Services & Well-Being (Wales) Act 2014. The four steps approach to assessment in the policy will mitigate the risk/s of any adverse impact, in particularly in relation to people with Disabilities and Older people.

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?

As above.

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 14, 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 15, please give details in the box below and explain why

The Local Authority would not make a change to a Citizen's current Care and Support Plan without carrying out a re-assessment. Where transport issues are relevant the Assessor would undertake the 4 step approach to assessing transport needs (Annexe 1 of Policy).

Implementation of the policy will therefore be on an individual basis. In each case involving change in relation to assistance with transport the Local Authority will protect their service provision for a period to be agreed on a case by case basis up to a maximum of 12 months. This is because individual circumstances will vary and the Local Authority would not wish to maintain dependence where there is an opportunity to support a Citizen to become independent in a shorter period.

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

Yes No *(please cross as appropriate X)*

If you answered Yes, please justify:

Census Data, Local Level Information and Service User feedback through engagement have been considered.

The Policy is based on Legislative requirements under the auspices of the Social Services & Well-Being (Wales) Act 2014, with the Local Authorities having a duty to re-evaluate the way in which we assess eligibility and meet need, as well as delivering Personal Well-Being Outcomes to our Citizens.

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

N/A

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:

N/A

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?

The intention of this revised Policy is to strengthen and advance the overall equality of opportunity to Conwy's Citizen's as a whole. It is based on new duties and requirements under the Social Services & Well-Being (Wales) Act 2014 and aims to provide a consistent and robust process for applying a reliable, fair and equitable approach to the assessment of eligibility for assistance with transport.

People who are assessed as eligible will still be provided with transport, in line with their assessed need. Those who are not will be directed to the most suitable method of travel available within the Community or provided for by themselves. This is inline with the rationale behind the Welsh Government's new legislation, ensuring we promote Independence, whilst safeguarding the future services and considering sustainability in a difficult financial climate for the Public Sector.

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

The policy is focussed on equality by providing a clear framework within which individual circumstances will be considered. What is appropriate for one person, will not be for another due to their specific circumstances

21. What actions could you take to achieve the same goal by an alternative means?

The policy is based on our statutory duties under the Social Services & Wellbeing Act. The process of assessment follows that required by the Act. Should the policy not be supported each practitioner would rely directly on the Act provisions and regulations in carrying out their assessment.

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				
Actions after EIA and policy/practice signed off				
Awareness raising / training session for staff who will be implementing the policy	100% staff attendance Reduction in requests for	12 months	SSD Training	

	<p>support with transport</p> <p>Delivers efficiencies</p> <p>Positive customer feedback in relation to increased independence</p>			
<p>Policy shared with service users at the point of review and plan agreed in relation to future support with transport</p>	<p>Easy read format developed to share with service users / carers at point of initial assessment or review.</p> <p>Customer feedback in relation to increased independence is positive</p> <p>Transport service able to respond to new enquiries for assistance due to move on to increased independence for those currently</p>			

	receiving a service No or limited number of complaints Delivers efficiencies			
Feedback from practitioners re implementation and issues	12 months			
Link closely to the work of the Transport Service	On-going			

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
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<input checked="" 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 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 Outcomes and Reviewing Data

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 to identify if the outcomes have changed since you introduced this new policy or practice.

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 (✓)
Impact monitored through the funding allocation panels of OP and disabilities and through customer feedback quality assurance questionnaires	Annually	Quality Standards	

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.