

Equality Impact Assessment

The Council is required to have due regard to the need to:

- eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Act
- advance equality of opportunity between people who share a relevant protected characteristic and those who do not
- foster good relations between people who share a protected characteristic and those who do not.

The Act explains that having due regard for advancing equality involves:

- removing or minimising disadvantages experienced by people due to their protected characteristics
- taking steps to meet the needs of people from protected groups where these are different from the needs of other people
- encouraging people with protected characteristics to participate in public life or in other activities where their participation is disproportionately low.

The protected characteristics are:

- Age
- Disability
- Gender reassignment
- Pregnancy and maternity
- Race
- Religion of belief
- Sex
- Sexual orientation

The duty also covers marriage and civil partnership but only with regard to eliminating discrimination. And in Wales we also have to treat Welsh and English on an equal basis as well as promoting and facilitating the use of the Welsh language.

Further advice on completing impact assessments can be found on StaffNet

<http://staffnet.valeofglamorgan.gov.uk/Directorates/Managing-Director-and-Resources/Performance-and-Development/Equalities/Equalities-Impact-Assessments/Equality-Impact-Assessments.aspx>

Title and description of the policy, procedure, practice or decision (referred to as “policy” throughout form).	<p>Supporting People Local Commissioning Plan 2016-19</p> <p>The Council is required by Welsh Government to produce an annual Local Commissioning Plan, which covers three year period. The Plan evidences the continuing need for housing related support funded by Supporting people and sets out the future service priorities for development along with the strategic approach to possible budget cuts.</p>
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Who is responsible for developing and implementing the policy?

Name	Helen Jones
Job Title	Strategy & Supporting People Manager
Directorate	Environment & Housing
Division	Housing Services

1. Who will be affected by this policy?

Examples may include Vale of Glamorgan residents, internal department(s), a specific group of customers or employees, customers or residents in a specific location.

Please specify:

Vale of Glamorgan residents

Internal Council Departments – Housing, Social Services, Safer Vale Partnership

Voluntary & Statutory Sector Partners

All vulnerable client groups in the Vale of Glamorgan who require housing related support

2. Does the policy relate to an area where there are known inequalities (for example, disabled peoples’ access to public transport; the gender pay gap; racist or homophobic bullying in schools; the educational attainment of Gypsies and Travellers)?

Yes

No

Please detail:

3. What will be the impact of this policy / decision / practice on people because of their age?

- Positive
- Negative
- Neutral / insignificant

What age groups will the policy impact upon?

- Young people (children and young people, up to 18)
- People 18- 50
- Older people (50+)
- All
- Other (please specify) _____

Reasons for your decision (including evidence) / How might it impact?

Supporting People commissions and funds housing related support services to vulnerable people to assist them to sustain independent living and to integrate fully into the community. It can be provided to anyone aged 16 and over who requires the service and helps prevents homelessness and the need for institutional living.

4. What will be the impact of this policy / decision / practice on disabled people?

- Positive
- Negative
- Neutral / insignificant

Which impairment(s)?

- Visual
- Hearing
- Physical disability
- Learning disability
- Mental health condition

All
Other (please specify) _____

Reasons for your decision (including evidence) / How might it impact?

The services provide individually tailored support to assist an individual to manage all aspects of their home, including budgeting, access to professionals (e.g. health), irrespective of any disability. They also promote wellbeing and the prevention of social isolation.

5. What will be the impact of this policy / decision / practice on different genders?

Positive
Negative
Neutral / insignificant

Will the impact be on:

Men
Women

Reasons for your decision (including evidence) / How might it impact?

Housing related support can provide assistance to **all** vulnerable people who require help to maintain a home and integrate into the community, irrespective of their gender.

The only services that are gender specific are those for women who have suffered or are in danger of suffering domestic abuse and these will not have a negative impact directly or indirectly on men as they include prevention work with the whole family.

6. What will be the impact of this policy / decision / practice on trans people?

Positive
Negative
Neutral / insignificant

Reasons for your decision (including evidence) / How might it impact?

Housing related support can provide assistance to **all** vulnerable people who require help to maintain a home and

integrate into the community. The services are developed based on the lead vulnerability e.g. learning disabilities, mental health, drug or alcohol issues. They are available to all irrespective of gender, age or any of the protected groups.

7. What will be the impact of this policy / decision / practice on marital status and civil partnership? (¹ see note on page 1)

Positive

Negative

Neutral / insignificant

Reasons for your decision (including evidence) / How might it impact?

Services are allocated to people based on their need and can provide assistance to **all** vulnerable people who require help to maintain a home and integrate into the community. The services are developed based on the lead vulnerability e.g. learning disabilities, mental health, drug or alcohol issues. They are available to all irrespective of gender, age or any of the protected groups.

8. What will be the impact of this policy / decision / practice on pregnancy and/or maternity?

Positive

Negative

Neutral / insignificant

Reasons for your decision (including evidence) / How might it impact?

Supporting People funded services provide the support that someone needs to deal with all aspects of their home, budgeting, access to professionals (e.g. health). The services promote health and wellbeing and prevent social isolation, which is positive for everyone that needs assistance, especially at a particularly vulnerable time in their lives.

9. What will be the impact of this policy / decision / practice on different groups because of their race?

Positive

Please indicate groups that may be affected:

- Negative
- Neutral / insignificant

- Ethnic minorities
- Nationalities
- Asylum seekers / refugees
- Gypsies / Travellers
- All
- Other (please specify) _____

Reasons for your decision (including evidence) / How might it impact?

The written eligibility criteria for each service ensures equality of access for all. Legal contracts are in place between the Council and the support organisation, which outlines all aspects of the service, including the service specification. Regular review and monitoring of services is undertaken by the Supporting People Team to ensure compliance.

10. What will be the impact of this policy / decision / practice on different groups because of their religion, belief or non-belief?

- Positive
- Negative
- Neutral / insignificant

- Religious group(s)
(please specify) _____
- Belief (e.g. Humanism)
(please specify) _____
- Non-belief
(please specify) _____
- All

Please indicate groups that may be affected:

Reasons for your decision (including evidence) / How might it impact?

Service specifications ensure that they are delivered in a non-judgemental way through adherence to robust policies and procedures which ensure that a person centred approach is taken to the support provided. All service providers have in place an Equality and Diversity Policy, which is reviewed by the Supporting People Team, along with compliance checks.

11. What will be the impact of this policy / decision / practice on different groups because of their sexual orientation?

- Positive
- Negative
- Neutral / insignificant

Please indicate groups that may be affected:

- Gay men
- Lesbians
- Bisexuals
- All
- Other (please specify) _____

Reasons for your decision (including evidence) / How might it impact?

All service providers have in place robust policies and procedures, including an Equality and Diversity Policy, which is regularly reviewed by the Supporting People Team, along with compliance checks.

12. What will be the impact of this policy / decision / practice on the Welsh language?

- Positive
- Negative
- Neutral / insignificant

Reasons for your decision (including evidence) / How might it impact?

Service Providers are required by the legal contract in place with the Council to adhere to the Council's Welsh Language Policy. Support staff are available to engage with service users in Welsh, if required

13. If you have identified any positive or negative impact (other than negligible) upon any protected characteristic groups or individuals then you must complete a full impact assessment.

Is a full equality impact assessment required

Yes

No

(It is a Welsh Government requirement that a full Equality Impact Assessment is undertaken for the Local Commissioning Plan.)

This decision must be authorised by the relevant Director, Head of Service or Operational Manager

Approved by (name)	Mike Ingram
Designation	Operational Manager, Public Sector Housing
Date	

If it has been identified that there is a requirement to produce a full equality impact assessment, you must continue overleaf. If, however, you have determined that a full assessment is not necessary, then you are required to submit an authorised electronic copy of this document to tsgreaves@valeofglamorgan.gov.uk

Only complete these sections if you have identified the need for a full equality impact assessment

14. Who will be affected by this policy?

Examples may include Vale of Glamorgan residents, internal department(s), a specific group of customers or employees, customers or residents in a specific location.

Please specify:

Vale of Glamorgan residents

Internal Council Departments – Housing, Social Services, Safer Vale Partnership

Voluntary & Statutory Sector Partners

All vulnerable client groups in the Vale of Glamorgan who require housing related support

15. Decisions must be based on robust evidence. Please detail the evidence that you have used to inform your assessment. What evidence do you have about how your service is used? What was the strength of the evidence and did you identify any gaps? Did the evidence identify any barriers to services, or different needs and priorities for protected characteristic groups? If the evidence was weak or gaps were identified, what action have you taken to address this?

There is a strong and formal information gathering and planning process set down by Welsh Government for Supporting People and detailed in the Supporting People Guidance June 2012 (updated July 2013). It requires local authorities to develop an annual Local Commissioning Plan which outlines commissioning and decommissioning intentions and shows evidence on how these decisions have been reached. There is a requirement for Partnership working with colleagues from the statutory sector, including Health and Probation, along with other Council Departments and the voluntary sector. Within the Guidance it also states that the Plan is required to reflect the priorities of the Single Integrated Plan and that decisions be based on robust evidence which gives an understanding of:

- The experience of people using services
- The Single Integrated Plan and local strategic objectives
- Existing service supply
- Need for housing related support (met and unmet)
- An understanding of service gaps
- Benefits to be gained from closer regional working

For this reason information is gathered from vulnerable people, support providers and people who work with all vulnerable client groups from both the statutory and voluntary sector. This is undertaken in a variety of ways e.g. Individual needs assessment forms completed by vulnerable people (format determined by Welsh Government), through feedback sessions with service users during service reviews, from support providers during service reviews, from formal planning meetings when each vulnerable client group is discussed and information gathered, from people who work with vulnerable client groups and also from the Supporting People Liaison Group which is an

open forum.

All of this data is outlined in the Plan, which will be a public document once adopted by the Cabinet and the Regional Collaborative Committee for the Vale of Glamorgan and Cardiff.

The levels of unmet need identified using data collected during 2014/15:

Client Group	Mild Issue	Moderate Issue	Serious Issue	Lead Issue	Other Needs Data from Practitioners	Needs from Dual Diagnosis analysis INAM's	Number of Units	Unmet Need Based on Lead & Other Data
Homeless or potentially homeless E10	17	42	262	200	33	622	70	1106
Mental Health E3	58	116	195	123	55	393	150	790
Physical Mobility E7	37	67	93	42	16	119	44	374
Chronic Illness E11	28	46	112	33	13	112	24	320
Young & Vul E8	26	55	87	31	6	98	44	259
Learning Difficulties E2	54	68	61	38	22	98	121	220
Domestic Abuse E1 (Women)	29	43	46	22	29	73	23	219
Single Parents E12	17	44	70	20	4	41	26	190
Drug Issues E5	37	35	43	13	10	51	24	165
Alcohol Issues E4	29	33	32	7	10	25	21	115
Criminal Justice E9	30	31	42	5	0	13	19	102
Domestic Abuse	9	17	12	2	26	1	0	67

E1 (Men)								
Refugee E6	0	0	0	0	0	0	0	0
Older People	8	36	65	27	2	62	625	-425

16. There is a legal duty to consult and involve people and organisations representing the protected characteristics where it is identified that they are potentially affected by the policy (for example men; women; parents; carers; the black and minority ethnic community (including asylum seekers, refugees, economic migrants); disabled people; the Welsh speaking community; the lesbian, gay and bisexual community; transgender people; different faith groups; etc.)

Please detail engagement activities that have taken place – internally and externally:

Supporting People funded services are open to all vulnerable client groups including any people included any with the protected characteristics. There is a formal consultation and planning process set down by Welsh Government for Supporting People.

The following consultation exercises were undertaken:

- Needs assessments undertaken with all vulnerable people requiring a supporting people funded service in the Vale of Glamorgan
- Completion of service reviews undertaken by the Supporting People Team in the Council where feedback is gathered from past and present users of the services
- Completion of quarterly individual service user reviews
- Planning group meetings
- Quarterly Supporting People Liaison Group meetings which are inclusive forums open to everyone

17. Will this policy have a significant effect on how services are delivered?

Yes

No

Please detail:

The Supporting People Local Commissioning Plan 2016 – 2019 (LCP) outlines the need for more housing related support services funded by the Supporting People Programme Grant. The aim is for less dependence on institutions and more independence and the plan details the services needed to support more people to remain in their own home with assistance.

The priorities listed were determined by the Supporting People Local Planning Group (membership of which is determined by Welsh Government) following analysis of all of the information collected through the annual planning process detailed in the Plan.

There is a possibility that there will be an effect on how services are delivered if any new services outlined in the LCP are developed.

18. Will this policy have a significant effect on how other organisations operate?

Yes

No

Please detail:

There will be an impact on services if, following a review of a service it is found to be no longer strategically relevant, not providing a good quality service to vulnerable people or is no longer providing value for money. In any of these cases, the Council will be required to either decommission or remodel the service to ensure that it is meeting the required need. As part of this process however full consultation would be first undertaken with the service users and service provider so that all decision making is informed.

19. Will the policy impact upon other policies or practices?

Yes

No

Please detail:

Supporting People services are preventative services which when delivered effectively ensure that vulnerable people are supported to sustain independent living in the community.

They therefore have a positive impact on other high level statutory services (in addition to preventing homelessness) such as Health, Social Services and Probation, as the support provided helps service users to avoid going into crisis and requiring costly interventions e.g. admittance to hospital, prison or other residential institutions.

20. Have you identified any evidence that the policy could directly or indirectly discriminate against or have an adverse impact on people in any of the protected groups? If 'Yes', what do you intend to do to mitigate against this? If you do not intend to mitigate against any identified adverse impact please provide justification.

Yes

No

Please detail:

No evidence has been identified that suggests the Supporting People Local Commissioning Plan could directly or indirectly discriminate against or have an adverse impact on people in any of the protected groups.

The Plan requires robust annual data collection, including equality monitoring to ensure that all decisions are informed and that people in the protected groups, vulnerable people, those with multiple or complex needs and minority populations are identified and services are planned and delivered accordingly. The decisions on the continuation of services, new service priorities and the approach to be taken to mitigate the impact of any budget cuts imposed by Welsh Government were therefore made solely on the data collected as detailed at 3 (page 3 to 5). All services (apart from services provided for women who have been victims of domestic abuse) are open to all genders and to anyone with a protected characteristic. Equality monitoring of people presenting to the services are collected and published in the Council's Annual Equality Report.

21. What can be done further to promote equality of opportunity by altering the policy? Please detail, including opportunities to promote good relations and community cohesion:

The Local Commissioning Plan promotes the development of housing related support options which meets the identified needs of the community, including specialist and supported housing. The services provide housing related support to assist people to maintain their homes and to integrate into the community.

An Eligibility Criteria is in place for each existing service and will be put in place for all new services which will give priority to those with

the highest level of housing related support needs. All support providers are required to have in place a robust equality policy and procedures.

22. It is a requirement of the specific duties in Wales to undertake future monitoring of the equality impact of a policy. Please provide details of the monitoring that you will conduct? (for example the number of disabled people using your service as a proportion of the general population)

Please detail:

Monitoring of Supporting People funded services is a requirement of Welsh Government.

The Supporting People Team will:

- continue to collect equality monitoring information in the required format, information on religion, language requirements, physical and mental impairment issues within the criteria of the DDA, health issues, mobility issues and issues to do with sexuality through our Individual Needs Assessment Forms which are used to evidence the Local Commissioning Plan priorities
- continue to review all services at regular intervals to ensure there are no barriers and the Equality Policies within each service are robust and being followed
- continue to consult with service users who require the services
- continue to gather and monitor individual service user outcomes every six months

23. How often will you analyse and report upon this monitoring information, and where will it be reported?

Please detail:

- The Local Commissioning Plan 2016-19 will be available on the Council's website once adopted by Cabinet and approved by the Regional Collaborative Committee for the Vale of Glamorgan and Cardiff
- Anonymised service user outcomes will be reported to Welsh Government every six months
- Service Reviews will be carried out at least every three years and the reports available on request
- The Supporting People Team will continue to complete the corporate equality monitoring form annually

24. How will you publish and publicise the policy to ensure equality of access to this information (including raising awareness with minority groups, producing information in accessible formats, etc.)?

Please detail:

The Local Commissioning Plan will be subject to wider consultation once adopted by Cabinet and the Regional Collaborative Committee for the Vale of Glamorgan and Cardiff.

It will be placed on the Vale of Glamorgan's website and be sent to all stakeholders through the existing Distribution Lists and Forums. Stakeholders will be advised that it is available in other formats and to contact the Supporting People Team for them

25. Any recommendations for action that you plan to take as a result of this impact assessment (listed in the sections above) should be included in your Team Plan or Departmental Service Plan.

Please detail those actions and where they will be placed:

- To continue to collect and report equality information for the people applying for and accessing services for publication by the Corporate Equalities Team.
- To analyse equality information annually in order to ensure that there are no areas of inequality or discrimination and include any adverse findings within service reports with the required recommendations,

compliance of which will be monitored by the Supporting People Team..

26. An equality impact assessment may have four possible outcomes, though more than one may apply to a single policy. Please indicate the relevant outcome(s) of the impact assessment below.

Please tick as appropriate:

No major change – the impact assessment demonstrated that the policy was robust; there was no potential for discrimination or adverse impact. All opportunities to promote equality have been taken.

Adjust the policy – the impact assessment identified potential problems or missed opportunities. The policy was adjusted to remove barriers or better promote equality.

Continue the policy – the impact assessment identified the potential for adverse impact or missed opportunities to promote equality. The justification(s) for continuing with it have been clearly set out. (The justification must be included in the impact assessment and must be in line with the duty to have due regard. Compelling reasons will be needed for the most important relevant policies.)

Stop and remove the policy – the impact assessment identified actual or potential unlawful discrimination. The policy was stopped and removed, or changed.

27. Authorisation of full assessment

This equality impact assessment must be approved by the relevant Director, Head of Service or Operational Manager.

Approved by (name)	Mike Ingram
Job Title	Operational Manager, Public Sector Housing
Date	

Signature _____

On completion of this form you must send an authorised electronic copy to the Equalities Section: tsgreaves@valeofglamorgan.gov.uk.