

## 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/corp\\_cust\\_services/equalities/equalities\\_policies\\_guidance/equality\\_impact\\_assessments.aspx](http://staffnet.valeofglamorgan.gov.uk/corp_cust_services/equalities/equalities_policies_guidance/equality_impact_assessments.aspx)

Title and description of the policy, procedure, practice or decision (referred to as “policy” throughout form).	Decision to reduce expenditure on Service Level Agreements in Adult Services with particular reference the arrangement with Diverse Cymru
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Who is responsible for developing and implementing the policy?

Name	Lance Carver
Job Title	Head of Adult Services
Directorate	Social Services
Division	Adult 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:

The current arrangement serves a section of the population with physical disabilities who require support, advocacy and assistance with completion of welfare rights applications

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:

The current service that is provided by Diverse Cymru supports people with physical disabilities to apply for welfare benefits.

3. 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?

Limited details have been made available to the Council to inform us of the effectiveness of the current agreement. Only one person in the last 6 months who has used this service has also been a service user of Adult Services. Diverse Cymru opened 33 cases in the first 2 quarters of 2014/15. The service is based in Cardiff and the organisation reports that services users in the Vale are visited rather than travel to Cardiff. This does not corroborate with the mileage costs which are very low. 26 home visits are claimed with a mileage figure of 116. The overall information is inconclusive with activity counted multiple times for individual service users making it difficult to ascertain how much actual service is being provided.

Alternative services exist to support individuals. We are unable to contact the individuals who have received the service as this information is kept confidential by Diverse Cymru and these personal details will not be released to us.

Communication has also been sent in writing to the organisation asking them to highlight the impact of reductions in funding. There is no

written response although the issues were discussed in meetings.

4. 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:

Discussions have taken place with Diverse Cymru regarding the requirement to make savings and the limited support that the current arrangement provides for Adult Services service users. These meetings took place on the 30<sup>th</sup> of September and the 15<sup>th</sup> of November. These are in addition to annual review meetings that have taken place in the past. In this context, Diverse Cymru have developed two proposals. One is a 20% reduction and the other is a 50% reduction with the provision of a more focussed service which supports those in greatest need in the Vale.

Additionally a further supplement has been highlighted within this option to be purchased from Diverse Cymru which will enable service users to receive visits at home where this is required. Given the potential difficulty that some of this particular group may experience it is recommended that this supplement is purchased.

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

Yes

No

Please detail:

There will be reduced capacity to provide advocacy and so the resources will be dedicated to those most in need. There is currently no selection or screening process in place to ensure that the service is appropriately utilised.

There is no alternative to the current budgetary constraints and it is in this context that discussions with commissioned organisations have taken place. This alternative model has been suggested by Diverse Cymru as a potential way forward.

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

Yes

No

Please detail:

Diverse Cymru advised that this service level agreement was a small part of their overall operation and at various times discussed other contracts that they have in place including large scale direct payment operations in a neighbouring authority.

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

Yes  No

Please detail:

8. 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?

Yes  No

If you do not intend to mitigate against any identified adverse impact please provide justification.

Please detail:

The change in provision results in a reduction to the service available to individuals who are physically disabled. Existing service users will receive the service until their welfare benefits situation is resolved however there will be fewer service users able to access the service in the future. The lack of detailed information from the provider regarding the existing service users and their disabilities makes the full impact difficult to gauge. However some resource will remain but with an improved focus on those who need it most. The council already provides itself a welfare rights service for those who meet our eligibility criteria. There are also numerous voluntary sector advocacy groups and advice services which should be able to provide the service which is required. These include:

CAB

Age Connects

CIB/RNIB (I found out this week that they have just secured 3 year funding for Welfare Rights)

Advocacy Matters

Diverse Cymru

Shelter

Advice UK

Welfare Rights.Net

Focus on Disability

Welfare Rights Advisers Cymru (WRAC)

Advocacy Support Network

Armed Forces Community Covenant

Speakeasy Advice Centre

Wales Council for Deaf People

The Friendly Trust

There may be some disadvantage however this will be mitigated by the availability of other organisations and by focussing the new agreement on those that require it most.

9. 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 savings are required to ensure that Adult services continues to be able to meet the eligible needs of the population of the Vale of Glamorgan. All service level agreements have been reviewed. Protection has been afforded to other organisations to ensure other services which support our clients are protected.

10. Has the assessment identified the need for future monitoring? If so, what monitoring do you intend to conduct? (for example the number of disabled people using your service as a proportion of the general population)



Please detail:

The reduced Service Level Agreement will continue to be monitored. Any unmet need can be captured through this process. The agreement will be made based upon a Letter of Understanding which will require improved reporting information to be provided by Diverse Cymru.

11. How often will you analyse and report upon this data, and where will it be reported?

Please detail:

The agreement will be monitored every 6 months. Service Level agreements/ Letters of Understanding are reviewed annually through a contract monitoring framework. In addition Adult Services provides annual equality information which is reported through the Equalities Team.

12. 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:

Diverse Cymru will advise any new and potential service users of the model of service which they operate. The majority of current referrals (apx 3/4 ) are generated through word of mouth and the organisation is expected to continue to promote its service.

13. 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:

Continued monitoring and review is essential.

14. 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.

## 15. Authorisation

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

Approved by (name)	Lance Carver
Job Title	Head of Adult Services
Date	2/12/14

Signature \_\_\_\_\_

On completion of this form send a signed copy and an electronic copy to the Equalities Section: [tsgreaves@valeofglamorgan.gov.uk](mailto:tsgreaves@valeofglamorgan.gov.uk). For support, ring: 01446 709446