

Equality Impact Assessment

Relating to: Funding Formula for Children's Centres Budget 2013/14

Date: 5th April 2012

Introduction

This Impact Assessment supports the County Council in meeting its legal obligations under the **Public Sector Equality Duty**, now contained in section 149 of the Equality Act 2010. The Equality Duty ensures that public bodies have due regard to the statutory needs referred to in section 149 when exercising their functions.

Section 149 provides that in exercising its functions an authority must have due regard to the need to:

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

Having due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and others who do not share it involves having due regard (in particular) to the need to:

- remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic;
- take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it; and
- encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.

Having due regard to the need to foster good relations between persons who share a relevant protected characteristic and those who do not share it involves having due regard (in particular) to the need to tackle prejudice and to promote understanding.

The steps involved in meeting the needs of disabled persons that are different from the needs of persons who are not disabled include, in particular, steps to take account of disabled person's disabilities.

Compliance with the duties in section 149 may involve treating some persons more favourably than others; but not if that will itself involve conduct which is made unlawful under the Equality Act 2010.

The protected characteristics to which the duty applies are age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation, also marriage and civil partnership but only in respect of the requirement to have due regard to the need to eliminate discrimination.

Having **due regard to** means consciously thinking about the statutory needs as part of the process of decision making, when the proposals are still at a formative stage, and before a decision is reached. This means that consideration of those equality issues must influence the decisions reached by public bodies. The Equality Duty must be exercised in substance, with rigour and with an open mind.

Indirect discrimination occurs where a condition criterion or practice is applied which would put people with one of the protected characteristics at a disadvantage, and the imposition of that condition, criterion or practice is not a proportionate means of achieving a legitimate aim, i.e. it cannot be objectively justified.

It is important to understand and consider how different people would be affected by the decisions the Council makes, so that policies and services are appropriate and accessible to all and meet different people's needs.

This assessment will help you think about the potential impact your proposals will have on all sections of the community. Recognising these impacts early on in the process of developing policies will assist good decision making and ensure that the County Council delivers services appropriate to people's needs. Remember that the Equality Duty involves having due regard to the needs to advance equality of opportunity and foster good relations between those who share a protected characteristic and those who do not, as well as to eliminate discrimination and other conduct which is unlawful under the Equality Act 2010.

1. Person responsible for undertaking this assessment:

Name: Ruth Lewis	Telephone: 01242-427239
Service: Commissioning	E-mail: ruth.lewis@gloucestershire.gov.uk

2. Name and brief description of the policy, service, strategy, procedure or function: (indicate whether new or revised)

Revised funding formula for children's centre budget.

3. Briefly describe its aims and expected outcomes

The current funding model for allocation of Early Intervention Grant (EIG) which funds Children's Centre activity is currently based on levels of deprivation in 4 tiers with the most disadvantaged areas receiving 10 times the amount per child than the least deprived areas. However this system does not accurately reflect true levels of affluence and deprivation in the individual reach areas.

A number of different models of funding have been explored for their suitability in meeting the proposed objectives. These were to reflect individual children's level of disadvantage, to mitigate unviable fluctuations in individual centre budgets and to establish a funding model that could easily be updated as to reflect population changes and level of deprivation as required.

4. Describe how this policy would impact on the Council's duty to:

- Eliminate discrimination, harassment and victimisation
- Advance equality of opportunity
- Foster good relations

Identify what particular groups of people would be affected by this policy.

A Children's Centre is defined in the Childcare Act 2006 as a place or group of places:

- which is managed by or on behalf of a the local authority to secure that early childhood services are made available in a integrated way;
- through which early childhood services are made available – either by providing the services on site, or by providing advice and assistance on gaining access to services elsewhere ; and
- at which activities for young children are provided.

Gloucestershire's Children's Centre Services have been developed over the last eight years. There are currently 39 Children's Centres organised in 20 clusters across the county. A range of 12 different providers currently have management oversight under Service Level Agreements (SLA) or contracts with GCC, with a total annual budget of £8.37 million.

All 39 of Gloucestershire's children's centres are currently expected to deliver a core offer of early childhood services:

- early years provision (early education and childcare);
- social services functions of the local authority relating to young children, parents and prospective parents;
- health services relating to young children, parents and prospective parents;
- training and employment services to assist parents or prospective parents; and
- information and advice services for parents and prospective parents.

It recognises the important role that children's centres have in Gloucestershire in leading and co-ordinating integrated children services for children under five and their families. With much research and evidence emphasising the benefits that come from identifying need early, and intervening sooner, in order to prevent difficulties from escalating and becoming more challenging and costly to ameliorate.

The Children's Centres in Gloucestershire have been allocated into seven locality areas which would each form one of the seven lots within the 2012 Children's Centre Tender. Gloucestershire County Council is seeking to commission a provider for each locality to provide effective early intervention and preventative services for children aged 0-4 and their families in accordance with the service specification. GCC wishes to optimise children centres potential to reach and support all families through a universal core offer of children centre services based on the revised core offer, whilst ensuring resources are targeted at those most in need.

Children centre services needs to be innovative, flexible and able to respond to the needs of the relevant areas. This community resource is being commissioned at locality level in order to ensure it reflects the needs of the 0-5 population and their families within the relevant areas, and is driven by local priorities as identified by the Joint Strategic Commissioning Framework for Early Years, and Gloucestershire's Children and Young Peoples Plan.

This equality impact assessment focuses on the methodology by which funding is allocated across the 39 children's centres.

5. Provide details of the evidence you have gathered in making this assessment, including data sources, consultation undertaken and the outcome/s of this.

Funding Model/ Deprivation Current funding model for allocation of Early Intervention Grant (EIG) which funds Children Centre activity is currently based on levels of deprivation in 4 tiers with the most disadvantaged areas receiving 10 times the amount per child than the least deprived areas. However this system does not accurately reflect true levels of affluence and deprivation in individual children's centre reach areas.

Following the consultation process with parents and partners during Summer 2011 a two tiered system which more accurately reflects an individual child's deprivation wherever they live has been identified as the preferred option.

Population figures The current funding formula for Childrens Centres is based on 2007 population figures. Increased levels of 0-4 year populations since then, has meant that there has been an overall rise of 0-4 year olds in this period by 10,178 giving a total population of 33,438 in 2011. Distribution of the children is not consistent with the difference in population figures by reach area ranging from an overall reduction of 245 to a rise of 1084

Funding proposal A number of different models of funding have been explored for their suitability in meeting the proposed objectives. These were to reflect individual children's level of disadvantage, to mitigate unviable fluctuations in individual centre budgets and a system that could easily be updated to reflect population changes and level of deprivation.

The consultation in Summer 2012 posed questions about 3 models for funding. These included the current complex 4 tier model, a simple single tier model and a 2 tier based on more funding going to most disadvantaged children. The 2 tier model marginally received most support.

Therefore, revised simpler funding formula is now proposed that relies on two tiers reflecting the population of 0-4 year olds and the expected level of deprived 0-4 year olds living in the local area. This will better reflect the level of need in areas served by centres based on IDACI data (Income Deprivation Affecting Children Index) as the basis for the funding allocation. As such rather than applying a 4 tier multiplier for deprivation, the budget is based on the number of children estimated as living in income deprivation in each children's centre area. The Index of Multiple Deprivation 2010 combines a number of indicators, chosen to cover a range of economic, social and housing issues, into a single deprivation score for each small area in Gloucestershire. It is more accurate than the current deprivation calculator. It allows each area to be ranked relative to one another according to their level of deprivation.

The proposed budget allocation allows every centre to remain viable. Any budget compensation needed would be further mitigated if the budget is grouped according to a locality. The total cost of compensation would be £164, 469. This could be paid as a one off payment for 2012/13 and 2013/14. This would

allow any potential provider to reallocate and realign resources in a way that best meets the needs of families within the locality to achieve the required outcomes.

6. Is this Policy affected by, or would it have an impact on other Meeting the Challenge proposals? Yes/No. (If yes, please specify relevant project and indicate how it is affected).

The children's centre budget funded from Early Intervention Grant has been maintained at £8.37 million for 2011/12, 2012 /13 and 2013/14. This was following an 11% reduction on the total budget to support MtC requirements in 2010/11.

All children's centres are currently completing a unit costing exercise based on the services that they are planning to deliver during 2012 /2013. This would provide commissioners with a clear indication of the proportion of universal and targeted services that are delivered, and the cost of providing the service to identified beneficiaries, including those children, adults and families defined as in greatest need. Activities which directly impact on payment by results national and local performance indicators would also be linked to a cost.

Unit costing returns from each of the 20 clusters of children's centres would provide a detailed analysis of the cost of delivering the services and interventions offered through the children's centre service. Quarterly contract monitoring during 2012 / 2013 will show how each service contributes to individual child / family outcomes.

7. Where any particular group is affected differently by the policy in either a negative or a positive way, if you identify a negative impact, explain what actions you have undertaken or you plan to undertake, including consideration of any alternative proposals, to lessen or negate this impact.

	Negative	Positive	Neutral	Evidence	Mitigating actions where a negative impact has been identified	How would the mitigating action be monitored/evaluated, including who would be responsible for monitoring

<p>Age</p>			<p>x</p>	<p>Children's Centres are for children under the age of five and their families.</p> <p>The funding model would reflect the level of deprivation in each Lower Super Output Area within each locality area. It would also take account of the population changes of 0-5 year olds across each locality since the last revisions to the funding formula were made.</p> <p>Therefore there would be no negative impact on children under the age of five who are identified as being vulnerable in the level of service they receive.</p> <p>Children who have been identified as vulnerable include children who have been LAC, and children on a Child Protection plan, must be included in targeted provision offered through the centre. Their involvement with children's centres is reported on a quarterly basis. The changes in the funding formula would have no impact on this.</p>		
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<p>Disability (indicate different impacts on different types of</p>		<p>x</p>		<p>Children and / or parents with disabilities and special needs are a targeted user groups and would continue to access services as they</p>		
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disability)				do at present. Additional services provided through Portage and the Early Start project would continue to support access to a range of provision offered through centres. Revisions to the funding formula by using the IDACI data would more effectively target this group and would continue to support this work.		
Gender reassignment			x	We do not anticipate any impact either positively or negatively		
Marriage & civil partnership			x	We do not anticipate any impact either positively or negatively		
Pregnancy & maternity		x		The joint overarching specification with the NHS would create more joined up support for the most vulnerable, and pregnant women and their partners. The revised specification would ensure that the service delivery continues to focus on early intervention and engagement with all parents when they access ante-natal services. The new funding model would support this activity.		
Race (including Gypsy & Traveller)		x		Unit costing plans and budget plans are submitted as part of quarterly monitoring. These are linked to children's centre business plans which		

				are also submitted annually. This allows scrutiny by commissioners on levels of activity to support particular user groups. This is further monitored through Annual Conversations. Revisions to the funding formula would not impact negatively on this activity.		
Religion or Belief			x	We do not anticipate any impact either positively or negatively		
Sex			x	We do not anticipate any impact either positively or negatively		
Sexual Orientation			x	We do not anticipate any impact either positively or negatively		
Indirect Discrimination		x		Children's Centres are required to complete self evaluation documentation and indicate the extent to which equality is promoted and diversity celebrated, illegal and unlawful discrimination is tackled and how the centre fulfils its statutory duties. This is supported with relevant data and case studies. Revisions to the funding formula would not rescind this requirement.		
Other groups: e.g. rural isolation, long term unemployed, health inequality, carers		x		The proposed funding model uses the IDACI (Income Deprivation affecting Children Index) data as the basis for the funding allocation for each locality. The IDACI index reflects within its calculations indicators such as unemployment, community deprivation, disability and health		

				inequality. It would mean the groups identified would be more accurately reflected in funding levels.		
Socio-economically deprived groups		x		<p>The proposed funding model uses the IDACI (Income Deprivation affecting Children Index) data as the basis for the funding allocation for each locality. This data would more accurately target this group.</p> <p>Due to these revisions there are minor fluctuations in budget which would be mitigated by a compensation payment for 2013/14 and 2014/15</p> <p>This would allow any potential provider to reallocate and realign resource, in a way that best meets the needs of families within the locality, to achieve the required outcomes for families in greatest need, which would include socio – economically deprived groups.</p>		
Community Cohesion	<p>Provide details of any ways in which the proposed activity would promote equality in the community between those who share a protected characteristic and those who do not, and how it would promote good relations between such groups</p> <ul style="list-style-type: none"> • Is there equality between those who would and won't benefit from the proposal? 			<p>Funding of Children Centre services by locality, would support further development of strategic partnerships with other agencies, including the voluntary and community sector, who have capacity issues in engaging with large numbers of providers.</p> <p>It encourages diversity of provision and supports the development of local solutions drawing on a range of effective practices, knowledge and</p>		

	<ul style="list-style-type: none"> • Are there strong relationships between groups and communities in the area affected and would the proposed action promote positive relationships? • Does the proposal bring groups/communities into increased contact with each other? 	<p>experiences to meet the needs of the locality.</p> <p>It provides an opportunity to use resources and staffing more effectively, to avoid duplication of services, including locality wide job roles and responsibilities.</p> <p>The development of locality strategic partnerships would support locality budget planning, identify shared priorities, and a shared understanding of the challenges and barriers in delivering services to meet the needs of the locality.</p>		
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Declaration

We are satisfied that an Assessment has been carried out and where a negative impact has been identified, actions have been developed to lessen or negate this impact where possible.

Where the impact on equalities of the policy or proposals is very significant, and mitigating actions do not sufficiently lessen the impact, or mitigating actions cannot be identified, we have considered whether to go ahead with the original proposal at all, or whether to reformulate it.

We understand that the Equality Impact Assessment is required by the County Council and that we take responsibility for the completion and quality of this assessment.

Completed by: Ruth Lewis *R. Lewis*

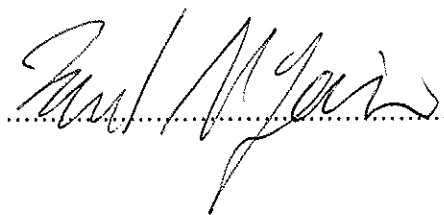
Date: April 2012

Role: Lead Commissioner for Early Years

Countersigned by Head of Service: *Inde Wen* Date: *23/5/12*

Name of relevant Portfolio Holder/Cabinet Member: *PAUL McCAIN*

I confirm that I have examined and understood the potential impact of the proposal and confirm that I have had due regard to the needs set out in section 149 of the Equality Act 2010.



..... Portfolio Holder/Cabinet Member

Date: 23rd May '12