

Equality Impact Assessment

Relating to: The implementation of the national Troubled Families programme in Gloucestershire

Date: 11th June 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 would 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 will 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:

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Service: Programme Support	E-mail: Eugene.okane@gloucestershire.gov.uk

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

Implementation of the national Troubled Families programme in Gloucestershire.

The government has announced a national programme to address the needs of 'troubled' families, challenging local authorities to identify and work with families experiencing multiple problems and address the whole family's needs. The Department of Communities and Local Government (DCLG) has estimated that there are 120,000 troubled families in the country; the indicative number of troubled families in Gloucestershire is 900.

3. Briefly describe its aims and expected outcomes

The aim of the programme is to provide intensive and coordinated support to the complex and vulnerable families identified within the programme. Work with families needs to address all family members (parenting is crucial) and recognise that the complexity of a family's needs may mean sustained interventions over a long period. The characteristics of troubled families (as defined by the DCLG) are:

- Adults on out of work benefit,
- Children not in school, and
- Family members involved in crime and anti-social behaviour

It is expected therefore that the programme will secure positive outcomes for the family in these areas i.e. adults off benefit and into work; improvements in school attendance and reductions in crime and anti-social behaviour. In addition the programme will provide support to identified families to address underlying issues that impact on the achievement of these outcomes, such as mental health, drug and alcohol misuse and domestic violence.

4. Describe how this policy will 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 will be affected by this policy.

The primary focus of the programme will be on adults, children and young people living in families experiencing multiple problems and suffering deprivation. Work is ongoing to identify the families and understand their characteristic (see section 5 below) however each family will receive an assessment of their needs and services will be delivered in a way that is sensitive to and responds appropriately to those needs – including where the individuals share a protected characteristic.

By addressing disadvantage the programme will seek to advance equality of opportunity between individuals in families who share a protected characteristic and other who do not share it. In addition a focus on employment and strengthening communities will support efforts to foster good relations within communities.

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

At the time of writing this Impact Assessment, the programme is in the Definition stage of development i.e. a mandate and funding has been provided by DCLG and the council has signed up to the programme. In terms of understanding the impact of the programme and the need to have due regard to the equality duty, the programme will progress through the following stages:

- Analysis of the data – defining which families will be included in the programme and identifying their characteristics.
- Gathering information on individuals within families who share a protected characteristic

• Use this information to shape the delivery approach within the programme – in particular ensuring that the support provided is sensitive and responds to the diverse needs of the families involved.

Data sources for the programme include GCC data on school attendance, youth offending, behavioural and educational needs, free school meals, crime and anti-social behaviour, looked after status and child protection. This is being supplemented with data from partners on adult offending, out of work benefits claimed, domestic violence and health data such as mental health and substance abuse.

Consultation is taking place with partner agencies providing services to these families and ongoing consultation with families will be integral to the programme.

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

Yes. The programme will be closely aligned with the 'Right First Time' programme; the development of locality working and the drive to work across service and organisational boundaries to provide coordinated support to complex and vulnerable families.

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 will the mitigating action be monitored/evaluated, including who will be responsible for monitoring.
Age		✓		Work will be targeted at families with children and young people.		

					Anticipated positive benefits for children and young people in terms of educational outcomes		
Disability (indicate different impacts on different types of disability)	✓				Analysis of data will provide information on any/types of disability within the family. The integrated assessment for families will ensure the plan takes account of the needs of individuals with disabilities		
Gender reassignment			✓				
Marriage & civil partnership			✓				
Pregnancy & maternity			✓				
Race (including Gypsy & Traveller)	✓				Analysis of data will provide information on the race and ethnicity of individuals within the families. The integrated assessment for families will ensure the plan takes account of diversity.		
Religion or Belief				✓			
Sex				✓			

Sexual Orientation			✓			
Indirect Discrimination			✓			
Other groups: e.g. rural isolation, long term unemployed, health inequality, carers		✓		<p>The programme has a focus on employment and helping the adults in the family overcome any barriers to entering the labour market. The integrated assessment for families will ensure the plan takes account health needs</p>		
Socio-economically deprived groups				<p>Funding through the programme offers an increased level of support for families in 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 will and won't benefit from the proposal? • Are there strong relationships between groups and communities in 			<p>The focus on reducing crime and anti-social behaviour inherent within the programme has the potential to promote positive community relationships. The emphasis on local delivery will facilitate a good understanding of the communities in which these families live. Coupled with work to encourage more pro-social behaviour this should have a positive impact on community cohesion</p>		

	<p>the area affected and will the proposed action promote positive relationships?</p> <ul style="list-style-type: none"> Does the proposal bring groups/communities into increased contact with each other? 			
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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: Eugene O'Kane Date: 25.6.12

Role: Troubled families Coordinator

Countersigned by Head of Service: *Wida Wen* Date: 27/6/12

Name of relevant Portfolio Holder/Cabinet Member:

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.

[Signature]

27th June 12

Date:

Portfolio Holder/Cabinet Member