

## Equality Impact Assessment (EIA)

This document demonstrates how the council is meeting its duties under the Equality Act 2010, by giving due regard to the requirement to: eliminate discrimination; advance equality of opportunity; and promote good relations.

### 1. Background

Directorate	Children's Services
Service area	Integrated Children and Families Commissioning Hub
Title of the activity being assessed i.e., the strategy, plan, policy, or service	<b>Sufficiency Strategy Home@theHeart: Transforming 48 London Road into a Children's Home and Staying Close flats</b>
Brief outline of the proposal(s)	<p>As corporate parents, Gloucestershire County Council is committed to ensuring children and young people in its care achieve the best possible outcomes and are well supported to step confidently into adulthood. When they cannot remain within their family, Gloucestershire County Council is committed to providing children and young people with permanence and stability in care settings which meet their changing needs over time.</p> <p>The 'sufficiency' duty to provide or procure placements for Children in Care (referred to as children looked after in legislation) is explicit within the Children Act 1989. The duty has since been strengthened by the introduction of Sufficiency Statutory Guidance (2010) and the Care Planning, Placement and Case Review Regulations 2010.</p> <p>The sufficiency duty requires Local Authorities and partners to ensure, through direct provision or commissioned services, that a range of placements sufficient to meet the needs of all children are available locally, or that there is a plan in place to move towards that position.</p> <p>Gloucestershire Sufficiency Strategy Home@theHeart has been approved by Cabinet on 25 January 2023, it describes how Gloucestershire intends to provide sufficient care placements for its children in care.</p>

	<p>Home@theHeart aims to reduce the number of children in care while also increasing local care capacity in both fostering and residential places</p> <p>This proposal is to re-purpose a Council owned property at 48 London Road (currently used by young people and staff as part of the Youth Support contract) to provide a 5 bed roomed Residential Home and 3 staying close flats as part of the delivery of the Council's Sufficiency Strategy Home@theHeart 2022-2026</p> <ul style="list-style-type: none"> <li>• a 5 bed Children's Home to provide registered accommodation for young people in need aged 12 – 17 years of age, delivering a therapeutic trauma informed model of care.</li> <li>• 3 single occupancy flats to allow young people to transition from the residential home; supporting young people from predominantly from 16-21yrs (25 yrs. for exceptional cases) as they transition into independence through "Staying Close" arrangements.</li> </ul>
Who is affected by the proposals?	<p>Service users <input checked="" type="checkbox"/> Workforce <input checked="" type="checkbox"/></p> <p>Other, please specify:</p>
Decision to be taken and decision maker	<p>To seek Cabinet approval for (a) the re-purposing of a Council owned property at 48 London Road (currently used to provide Youth Support services under the council's Youth Support Services contract) by converting it into a 5 bed roomed Children's Residential Home and 3 staying close flats as part of the delivery of the Council's Sufficiency Strategy Home@theHeart 2022-2026; and (b) to seek delegated authority to procure building works for the purpose carrying out such conversion works and (c) to procure day-to-day delivery of accommodation and support services, with 24/7 staffing, to support the young people who will be living in this property.</p>
Person(s) responsible for completing this assessment	<p>Amy Davies Project Manager, Children's and Families Commissioning</p>
Date of this assessment	<p>09/11/2022 revised 27/01/2023</p>

## 2. Information Gathering

Briefly outline your approach to consultation and engagement, together with details of any other information and data sources you have utilised:

Research, Consultation and Engagement	
Service users	<p>In developing the Sufficiency Strategy: Home@theHeart, we carried out an extensive consultation which was wider than that undertaken in 2018. There was engagement with care experienced young people as well as providers and in-house foster carers to capture different aspects of developing and sustaining homes for children in care.</p> <p>This proposal is based on the ambitious Sufficiency Strategy that includes developing residential provision in the county to stop children being placed far from home, and to offer security and stability for our young people.</p> <p>The number of children in care has increased and remains high, which means many children are in placements outside of Gloucestershire. Our intention is to develop a residential provision in Gloucestershire so that the young people will be able to remain in contact with their families and friends. Having a provision in the county will allow them to preserve a strong community connectedness.</p> <p>We will use some children's care experienced Ambassadors to inform and advise on the project to develop the new contracts</p>
Workforce	<p>The successful provider that is awarded the contract for the running of a Children's Home provision and Moving On flats from 48 London road will:</p> <ul style="list-style-type: none"> <li>• be required to offer a model that offers flexibility and innovation,</li> <li>• be able to offer a trauma informed workforce dedicated to children in care and Care Leavers with high levels of need</li> <li>• be expected to provide evidence of their organisation's commitment to equality within the workforce. This can be demonstrated through evidence of appropriate staff professional development and training.</li> </ul>
Partners	N/A
Other	N/A

### 3. Equality Assessment

Briefly explain your assessment of the impact of the proposed activity on the protected characteristics below. This section evidences how the council is giving due

regard to the three aims of the general equality duty, which are to: eliminate discrimination; advance equality of opportunity; and promote good relations.

Protected Characteristic	Service Users	Workforce
Age	<p>The accommodation will be made up of a 5 bed Children’s Home to provide registered accommodation for young people in need aged 12 – 17 years of age, delivering a therapeutic trauma informed model of care. In addition to the residential home the site will provide 3 single occupancy flats to allow young people to transition from the residential home supporting young people from predominantly from 16-21yrs (25 yrs. for exceptional cases) as they transition into independence through “Staying Close” arrangements.</p> <p>A consultation exercise was undertaken in 2021 with young people in care, in relation to their views being heard. These include the need to address the key messages which young people in care have voiced which about the need to:</p> <ul style="list-style-type: none"> <li>• Feel valued,</li> <li>• Feel Safe</li> <li>• To be treated with respect</li> <li>• Understand what is happening</li> <li>• Develop the right skills for their journey</li> <li>• Ensure there is better matching between themselves and foster carers</li> </ul> <p>The Gloucestershire’s Sufficiency Strategy includes developing residential provision in county to stop children being placed far from home, this will also include exploring options to achieve better outcomes for children and young people in care to find the right placement.</p> <p>We will also work with the children’s care experienced Ambassadors to inform and advise on the project to develop 48 London</p>	<p><b>A highly skilled and flexible workforce</b> developed in Gloucestershire to care for our local children and families that are empowered to deliver good quality support and maintain trusted, long-term relationships with children and young people.</p> <p><b>A range of local, high-quality homes</b> that ensure the right homes are available to meet the range of needs children and young people have and support stability as well as meeting regulatory requirements.</p>

	road into a provision that will deliver children in care sufficiency services and meet the needs of young people.	
Disability	<p>The sufficiency service is for children and young people who have experienced complex trauma, therefore the carers ability to identify and support these children is essential. It is imperative that the needs of the individuals will be catered for by the provider. This would be identified by completing a comprehensive needs assessment to identify their needs and to ensure that they will be met.</p> <p>The cohort of young people that may use the sufficiency Services will have varying needs, emotional well- being and mental health needs. The provider will be able to access the relevant support to meet the needs.</p>	<p>The provider will need to demonstrate a clear track record of working with young people who have experienced extreme and complex Trauma</p> <p>Also, the provider will need to provide any training for Trauma informed care.</p>
Sex	<p>We currently have 870 children/ young people in care, where 58.4% are male, 41.4% female and 0.2% indeterminate.</p> <p>The recent Census 2021 shows the overall population split by sex in Gloucestershire is slightly skewed towards females, with males making up 48.9% of the population and females account for 51.1%. This situation is also reflected at district, regional and national levels. It is recommended that specific consideration is given to the design of the children in care sufficiency services, to reflect and be sensitive to the gender profile of service users.</p>	<p>The successful provider will be expected to adhere to GCC anti-discriminatory policies and not employ staff on the basis of their sex.</p>
Race	<p>The sufficiency strategy identifies that children from ethnic minority backgrounds are overrepresented amongst children in care compared to the local population, reflecting a national trend.</p> <p>A key determinant for children in care will be achieving the most appropriate match of young people rather than the race of the individual. As part of the specification there</p>	<p>The successful provider must demonstrate their commitment to anti-racism.</p> <p>GCC will require evidence that the Provider's anti-racism policy. GCC</p>

	<p>will be an expectation of an openness to of the whole service to reflect the sex and race of the young people accessing the service.</p>	<p>Commissioning will also require evidence of the provider's efforts to actively reduce bias through training along with embedding processes, policies and expectations that help create a culture rooted in diversity and inclusion and have clear robust disciplinary policies for any violations. The provider will be expected to demonstrate their commitment to recruiting a staff team that reflects the cultural diversity of our Children in care.</p>
<p>Gender reassignment</p>	<p>Children's services do not collect data against certain protected characteristics of young people, for example sexual orientation or gender reassignment status. There are no official estimates of gender reassignment at either national or local level.</p> <p>However, the provider must create an environment that recognises all forms gender identity.</p>	<p>Managers must create an environment that is accepting of all gender identities and recognise that some young people and employees may have different needs.</p>
<p>Marriage &amp; civil partnership</p>	<p>Children's services do not collect data against certain protected characteristics of young people, for example marriage and civil partnership.</p>	<p>No significant impact identified</p>
<p>Pregnancy &amp; maternity</p>	<p>Children services do not routinely report the number of young people who are pregnant given the possibility of that information being used to identify the young person concerned. The needs of individual children and young people will be reflected in the service specification for the tender and on placement.</p> <p>As Corporate parents we would assess the individuals needs of the young person and</p>	<p>The successful provider must demonstrate a track record of working with young people who are pregnant or who have maternity status.</p>

	consider the best place for them to get the right support they need.	
Religion and/or belief	As this strategy covers all young people those with all religions and beliefs will be represented at population levels. According to the 2011 Census, 63.5% of residents in Gloucestershire were Christian, making it the most common religion. This was followed by no religion which accounts for 26.7% of the total population. Those aged 0-18 are more likely to report no religion than older age groups. This trend is reflected at a regional, national and district level. The needs of individual children and young people will be reflected in the service specification. This would be identified by completing a comprehensive needs assessment to identify their needs and to ensure that they will be met.	The successful provider will be expected in their tender to evidence successful provision of services for young people and staff with differing religious beliefs.
Sexual orientation	Children's services do not collect data against certain protected characteristics of young people, for example sexual orientation or gender reassignment status.  The needs of individual children and young people will be reflected in the service specification. The successful provider will be expected to support and promote LGBTQ+ work as part of the core equality principles that are shared throughout GCC.	The successful provider will be expected to provide a working environment that is conducive and supportive of LGBTQ+ equality principles. The provider must assure equal rights to paternity leave, adoption leave, parental leave, shared parental leave, the right to request flexible working rights and the right to time off work to care for dependants.

#### 4. Completed Actions

Set out how the proposed activity has already been amended following the equality assessment, to maximise the positive impact or minimise the negative impact:

Change	Reason for Change
We will work with some children's care experienced Ambassadors to inform and	Representatives of care experienced young people will convey the views and

<p>advise on the project to develop the new contracts. This will enable them to provide suggestions/ comments at all stages of the project.</p> <p>The Ambassadors are made up of 75-80% of care experience young people, they also include young parents, pregnant young people, ethnicity diverse, and young people with disability (non disclosed).</p> <p>We would also work with Voice Gloucestershire, children in care council which is made up of:</p> <ul style="list-style-type: none"> <li>• 5-11 Children in care forum</li> <li>• 11-16 Children in care forum</li> <li>• 16+ Care leavers forum</li> </ul>	<p>opinions of the young people based on their real-life experience. This is expected to be instrumental in further improving the service.</p>
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## 5. Planned Actions

Set out improvements that will be undertaken, following the equality assessment, to further maximise the positive impact or minimise the negative impact:

Potential impact (positive or negative)	Action	By when	Owner
Positive	The children's social care service is under constant demand, which means many children are in placements outside of Gloucestershire. Our intention is to develop a residential provision in Gloucestershire so that the young people will be able to remain in contact with their families and friends.	Ongoing	Wendy Williams
Positive	Commissioning a provider to deliver a local residential home and move on flats will allow our Commissioning Service to have robust oversight of the quality of the provision. The benefit of this model is that it offers flexibility and innovation.	ongoing	Wendy Williams
Positive	The successful providers must be able to demonstrate and implement from the	Ongoing	Wendy Williams




	contract commencement the expected equalities expectations as set out in this EIA by GCC.		
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## 6. Monitoring and review


<p>The following processes/actions will be put in place to keep this 'activity' under review:</p>
<p>There will be regular project meetings to monitor the progress of the project.</p> <p>Feedback will be given at Senior Leadership Meetings.</p> <p>Comments from young people and staff will be used to monitor the success of a) the delivery of the children in care sufficiency strategy, b) That the commissioned services, and range of placements are sufficient to meet the needs of all children in care and are available locally</p> <p>The implementation of the new Sufficiency Strategy will be led by the Children and Families integrated Commissioning Hub, with progress overseen by Children's Services Senior Leadership, Children's Services Continuous Improvement Board (CIB) and CFOSC.</p>

## 7. Officer / Decision-maker Sign off

Officer: By signing this statement off as complete you are confirming that 'you' have examined sufficient information across all the protected characteristics and used that information to show due regard to the three aims of the general duty. This has informed the development of the activity

Signature of Senior Officer	
Name of Senior Officer	Chris Spencer, Executive Director of Children's Services
Date	15.03.23

Decision maker: I am in agreement that sufficient information and analysis has been used to inform the development of this 'activity' and that any proposed improvement actions are appropriate, and I confirm that I, as the decision maker, have been able to show due regard to the needs set out in section 149 of the Equality Act 2010.

Signature of decision maker	
Name of decision maker	Cllr Stephen Davies Cabinet Member for Children's Safeguarding and Early Years
Date	15.3.23

## 8. Publication

If this document accompanies a Cabinet report or an Individual Cabinet Member (ICM) decision report it will be published, as part of the report publication process, on the GCC website. If this statement is not to be submitted with a Cabinet report or an Individual Cabinet Member (ICM) decision report, please maintain a copy for your own records that can be retrieved for internal review and also in case of future challenge.



## Appendix 1 – Service User Data

Details of service users affected by the proposed activity

Protected Characteristic	Service User Data and Information
<p>Age <i>percentage/profile of service user ages</i></p>	<p>The predominant users of this service will children in care and care leavers open to Children’s Social Care.</p> <p>The population of Gloucestershire is approximately 640,550, with an estimated 142,868 children and young people aged between 0-19 living in Gloucestershire (Source: <u>Mid-2020 Population Estimates, Office for National Statistics</u>).</p> <p>As of December 2022, there were 876 children in care aged 0-17. (Source: GCC web reports).</p>
<p>Disability <i>percentage/profile of service users who have a disability</i></p>	<p>According to the 2021 Census, 16.7 % of Gloucestershire residents reported having a long-term limiting health problem, this was below the national average – 17.6%. Across the age ranges – 3.1% 0-15yrs, 7.8% 16-49yrs, 18.3% 5-64yrs and 49% aged 65yrs plus report having a long-term limiting health problem.</p> <p><b>Children and young people</b></p> <p>The children in need census as of 31 March 2022 showed that there were 404,310 children in need in England of whom 8% were recorded as having a disability, which is greater than local at 7%. At that time 50,920 children were subject to a child protection plan of whom 5% were recorded as having a disability. Children with a recorded disability were therefore less likely to be the subject of a child protection plan than other children in need.</p> <p>In Gloucestershire of the 876 children in care in December 7% have a disability. (ChAT).</p> <p>In Gloucestershire 5,329 children and young people have an Education, Health and Care Plan as of December 2022.</p>

<p style="text-align: center;"><i>Sex percentage/profile of service users who are male and who are female</i></p>	<p>The overall gender split (whole population) in Gloucestershire is slightly skewed with 51% of the population being female. As age increases the gender difference become more significant where women account for 65.9% of the population aged 85+. Women are also more likely to head lone parent households with dependent children. There is a higher proportion of women accessing and receiving social care services.</p> <p>Boys are over-represented in our children in care cohort with around 56% being male. This proportion has been stable over time and is broadly in line with comparators.</p>
<p style="text-align: center;"><i>Race percentage/profile of service users who are from black and minority ethnic backgrounds</i></p>	<p>All services users will not have English as their first language.</p> <p>According to the ONS 2021 Census 93.1% of Gloucestershire residents are White British/White Other, 2.9% Asian/Asian British, 1.2% Black/Black British and 2.2% Mixed/Multiple Ethnic.</p> <p>White Other often refers to Eastern European residents and as Polish is the second most prevalent language spoken in the county next to English, where possible I have separated these for this report.</p> <p>Gloucester City and Cheltenham have the largest proportion of BME communities in the County, however there are also pockets of diverse communities in rural parts of the county and engagement of these communities will need to be addressed as part of the communication strategy.</p> <p>In Gloucestershire after English, Polish is the first language most commonly spoken at home, followed by Gujarati, Czech, Malayalam, Bengali, Portuguese, Urdu, Chinese, Tagalog/Filipino and Slovak. Over 100 languages have been identified as being spoken in the county.</p> <p>The management information collated over the last three years shows that the languages most often requiring interpreting within Gloucestershire are currently Czech, Polish, Portuguese, Bulgarian, Arabic, Pashto and Kurdish.</p> <p>Within our Children in Care population 78% are White, 12% of Mixed heritage, 3% Asian/Asian British, 4% Black or Black British and 2% Other – the remainder not stated/not recorded.</p>

<p>Gender reassignment <i>percentage/profile of service users who have indicated they are transgender</i></p>	<p>We do not collect data against certain protected characteristics of service users, for example their sexual orientation, gender reassignment status, religion, marriage or civil partnership or pregnancy and maternity. There are no official estimates of gender reassignment at either national or local level, making it difficult to obtain a true reflection of this population.</p>
<p>Marriage &amp; civil partnership <i>percentage/profile of service users who are married or in a civil partnership</i></p>	<p>Just over 50.2% of Gloucestershire's residents aged 16+ are married, this is higher than the national average. The proportion of the population who are divorced or widowed also exceeds the national average, while the proportion of people who are single or separated is below the national average. There is considerable variation in marital status between the age groups, with those aged 16-24 most likely to be single and those aged 65+ most likely to be widowed. This may have an impact on the family support people have available to them and the level of support they require from elsewhere. Service User Diversity Report 2021/22</p>
<p>Pregnancy &amp; maternity <i>percentage/profile of service users who are female and who are pregnant or on a maternity leave</i></p>	<p>We do not collect data against certain protected characteristics of service users, for example their sexual orientation, gender reassignment status, religion, marriage or civil partnership or pregnancy and maternity.</p>
<p>Religion and/or belief <i>percentage/profile of service users religious beliefs</i></p>	<p>63.5% of residents in Gloucestershire are Christian. This is followed by 'no religion' which accounts for 26.7% of the total population.</p> <p>Gloucestershire has a higher proportion of people who are Christian, have no religion or have not stated a religion than the national average. In contrast it has a lower proportion of people who follow a religion other than Christianity, which reflects the ethnic composition of the county.</p> <p>We do not collect data against certain protected characteristics of children, young people and families specifically relating to their religion or beliefs.</p>

<p>Sexual orientation <i>percentage/profile of service users who are lesbian, gay, bisexual, heterosexual</i></p>	<p>We do not collect data against certain protected characteristics of service users, for example their sexual orientation, gender reassignment status, religion, marriage or civil partnership or pregnancy and maternity.</p>
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## Appendix 2 – GCC Workforce Data

Details of Gloucestershire County Council staff affected by the proposed activity

Protected Characteristic	Total number of GCC staff affected:
Age	Not affected
Disability	Not affected
Sex	Not affected
Race	Not affected
Gender reassignment	Not affected
Marriage & civil partnership	Not affected
Pregnancy & maternity	Not affected
Religion and/or belief	Not affected
Sexual orientation	Not affected