

## Equality Impact Assessment (EqIA)

The Equality Act 2010 introduced the Public Sector Equality Duty which states that a public authority must, in the exercise of its functions, have due regard to the need to:

1. Eliminate discrimination, harassment and victimisation and any other conduct prohibited by or under the Act
2. Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it
3. Foster good relations between persons who share a relevant protected characteristic and persons who do not share it

This document demonstrates how the Council is meeting the Public Sector Equality Duty by setting out the findings of an equality analysis that has been undertaken in relation to a proposed change to assess whether it has a disproportionate impact on people who share a protected characteristic. The Council's Equality Impact Assessment (EqIA) process covers additional groups not 'protected' by section 149 of the Equality Act 2010, including care leavers and care experienced adults.

### 1. Background

Directorate	Adult Social Care
Service area	-
Title of the proposed change being assessed i.e. the policy, service or other development	Medium Term Financial Strategy (MTFS) 2024/25  Market Sustainability and Improvement

Describe the purpose of the proposed change and the intended outcomes
<p>The purpose of the MTFS is to give financial expression to the Council Strategy, <a href="#">Building Back Better in Gloucestershire 2022-26</a> for the next four-year period. The MTFS sets out the Council's high-level funded plan for achieving its vision and priorities, balancing available financing and spending ambitions. It highlights the financial projections for financing, spending (revenue and capital) and reserves.</p> <p>The MTFS is prepared annually and covers the four-year period 2024/25 to 2027/28. It links decisions on resource allocation with decisions on policy priorities as set out in the Council Strategy. This EqIA is Appendix 4 of the MTFS 2024/25 – 2027/28 report being considered by Cabinet on 31 January 2024.</p> <p>Each Directorate's priorities and plans for the year are set out in their Commissioning Intentions which are included in Annex 1 of the MTFS. Proposals for cost increases (investment) and cost reductions (savings) are driven by these Commissioning Intentions.</p>

Who is affected by the proposals?

Service users:	Yes
Wider community:	Yes
Workforce:	Yes
Other (please specify):	Families/Unpaid Carers Care providers and carers

Decision to be taken and decision maker	Cabinet decision on 31 January 2024: To recommend the Medium Term Financial Strategy (MTFS), 2024/25 revenue and capital budgets and Precept to Council
Person(s) responsible for completing this assessment	Head of Quality & Performance Adult Social Care Head of Integrated Commissioning – Older People Head of Integrated Brokerage
Date of this assessment	October 2023

## 2. Information and Data Collection

This table summarises the Council-wide approach to engagement and consultation. Details of the information and data collected (including through engagement and consultation exercises) for each budget proposal are set out within section 3.

Stakeholders	Engagement and Consultation
<p>Service Users / Wider Community</p>	<p>Following a decision by the Deputy Leader and Cabinet Member for Finance and Change (<a href="#">details here</a>), a public consultation on the Council's draft budget for 2024/25 took place over a five-week week period between 7 December 2023 and 11 January 2024.</p> <p>To raise awareness of the budget consultation and how people could provide their views on the proposals, information was made available via the county council's website, Information was also shared with local media contacts and via the County Council's social media accounts (Facebook, Instagram, X, Nextdoor) and with subscribers of Council e-newsletters.</p> <p>Posters were also displayed in libraries and in other GCC buildings.</p> <p>There were reminders throughout the consultation period to make sure there were multiple opportunities for interested parties to see the relevant information and the invite to respond.</p> <p>A budget consultation booklet was produced and made available on-line and in hard copy via libraries. Other formats were available upon request.</p> <p>A questionnaire was also produced to help collate views. This was available online, in hard copy and in other formats, in the same way as the booklet.</p>
<p>Workforce</p>	<p>The formal budget consultation included the sharing of information with the recognised trades unions including council, teaching and fire unions and provision of a collective consultation meeting.</p> <p>Information was shared with County Council staff via the weekly e newsletter and via the front page of the intranet.</p>

	<p>Staff networks were also sent information, with a request to provide their views and promote the consultation through their communications channels and networks.</p>
Partners	<p>Information was shared with public sector partners, via the Warning and Informing Communications Group with a request to raise awareness of the budget consultation within their individual organisations and share information through their communication channels.</p> <p>Information was also shared with town and parish councils, a range of community groups, young people organisations, with a request that they share information through their communication channels and local networks.</p>
Other	<p>Information was shared with county councillors, asking them to take part in the consultation and to support the County Council to raise awareness by sharing information through their communication channels and local networks.</p>

### 3. Equality Assessment, Actions and Monitoring and Review

#### 3.1 – Status Quo

See the ‘Needs Analysis’ section of the Commissioning Intentions which identifies equality, diversity and inclusion related issues.

#### 3.2 – The Proposed Changes: Revenue

Also see the ‘Equalities Response’ section of the Commissioning Intentions which sets out the equality, diversity and inclusion related priorities identified through the needs analysis and summarises the actions that will be taken to address these.

<b>Service Users</b>				
<b>Budget Change Proposal</b>	<b>Summary of the information and data gathered, including through engagement and consultation</b>	<b>Protected Characteristics / Additional Groups</b>	<b>Summary of the assessment of the potential or actual impact on those who share the protected characteristics or are in the additional groups</b>	<b>Actions to further maximise the positive impact or minimise the negative impact</b>  <b>Arrangements for monitoring and review</b>
<b>Revenue Cost Increases (Investment)</b>				
<b>Bed based and community based inflationary uplift (including the National Living Wage)</b>	The additional funds are required to meet cost pressures associated with the strategic changes in commissioning patterns.	<b>Protected Characteristics<sup>2</sup></b> <ul style="list-style-type: none"> <li>• Age</li> <li>• Disability</li> </ul>	<b>Positive</b> People are supported to live at home for longer. Making best use of funding to ensure Adults are able to live	<b>Actions</b> 1) Funding is being used to address fee rates. £4.000m contributed to MTFS funding the

<sup>2</sup> We recognise that individuals within this broad range of protected characteristics of older people may have more than one protected characteristic and may fall into other multiple additional groups e.g. race, religion or belief, gender, sexual orientation, marriage or civil partnerships.

Service Users				
Budget Change Proposal	Summary of the information and data gathered, including through engagement and consultation	Protected Characteristics / Additional Groups	Summary of the assessment of the potential or actual impact on those who share the protected characteristics or are in the additional groups	Actions to further maximise the positive impact or minimise the negative impact  Arrangements for monitoring and review
	Our commissioning intentions continue to be to support more people to live in the community for longer and reduce reliance on bed-based care. Success in this will result in GCC supporting more people at home for longer which will mean: the staff working in the community need to be upskilled accordingly which will cost providers more and has not been achieved within current prices; there will need to be higher levels of trained staff in care homes which will cost providers more and has	<b>Additional Groups</b> We recognise that individuals characterised by age/disability characteristic may fall into other multiple additional groups e.g. veterans, carers, digital exclusion, geography (urban/rural areas), or other vulnerable groups of society.	independently in the community with the right wrap around support is crucial. The Commissioning Strategy will see a reduced reliance on bed-based care. We will need to continue to work with the VCS and providers to proactively respond and meet the needs and pressures e.g. recruitment and retention and competencies to meet more complex needs in people's homes. Any future changes to legislation e.g. Care Act Reform will only be enhanced by this	inflationary uplift of 6.92% for bed-based care and 6.83% for community-based care and £1.918m will fund a 4% fee increase to providers of bed-based nursing and dementia care.  2) Continue to work in partnership across the Integrated Care System to improve pathways for older people including frailty, dementia and end of life. Including work around the Enhanced Health in Care homes Framework and the Proactive Care Framework.

Service Users				
Budget Change Proposal	Summary of the information and data gathered, including through engagement and consultation	Protected Characteristics / Additional Groups	Summary of the assessment of the potential or actual impact on those who share the protected characteristics or are in the additional groups	Actions to further maximise the positive impact or minimise the negative impact  Arrangements for monitoring and review
	<p>not been achieved within current prices; a more rapid turnover of rooms in care homes and therefore more empty bed days which has a financial impact on providers which may not be sustainable at current prices.</p> <p>Further information about our Market Sustainability can be found in our MSP 2023<sup>1</sup></p> <p>Grant guidance June 2023 identifies 3 target areas of improvement to focus on:</p>		<p>approach as we support people to live in their own homes for longer.</p>	<p>3) Our Proud to Care offer will support the Care provider market around recruitment and retention to meet the needs of this protected group.</p> <p><b>Monitoring and Review</b></p> <p>4) Contract Monitoring of our care provider market will be undertaken by Brokerage Team to ensure no inequalities are faced by this protected group in</p>

<sup>1</sup> [gloucestershire-market-sustainability-plan-2023-final.pdf](https://www.gloucestershire.gov.uk/media/10000000/2023-06-01-gloucestershire-market-sustainability-plan-2023-final.pdf)

Service Users				
Budget Change Proposal	Summary of the information and data gathered, including through engagement and consultation	Protected Characteristics / Additional Groups	Summary of the assessment of the potential or actual impact on those who share the protected characteristics or are in the additional groups	<p>Actions to further maximise the positive impact or minimise the negative impact</p> <p>Arrangements for monitoring and review</p>
	<ul style="list-style-type: none"> <li>1) increasing fee rates paid to adult social care providers in local areas;</li> <li>2) increasing adult social care workforce capacity and retention;</li> <li>3) reducing adult social care waiting times.</li> </ul>			<p>the delivery of our Care Act Duties and their assessed for needs.</p> <ul style="list-style-type: none"> <li>5) Market Management Portfolio within Adults Transformation Programme will oversee improvements and market sustainability</li> <li>6) Systemwide working and integrated commissioning through Ageing Well Programme of work.</li> </ul>



Service Users				
Budget Change Proposal	Summary of the information and data gathered, including through engagement and consultation	Protected Characteristics / Additional Groups	Summary of the assessment of the potential or actual impact on those who share the protected characteristics or are in the additional groups	Actions to further maximise the positive impact or minimise the negative impact  Arrangements for monitoring and review
<b>Activities to improve market sustainability and workforce</b>	Nationally we are facing an unprecedented challenge in recruiting staff across the health and social care systems and vacancy levels are high (Skills for Care, 2022a <sup>3</sup> ; Burns & Hold, 2022 <sup>4</sup> ). The picture is no different in Gloucestershire. We face competition from other industries who	<p><b>Protected Characteristics<sup>8</sup></b></p> <ul style="list-style-type: none"> <li>• Age</li> <li>• Disability</li> </ul> <p><b>Additional Groups</b> We recognise that individuals characterised by age/disability characteristic may fall</p>	<p><b>Positive</b> People are supported to live at home for longer with personalised services to meet their needs. Making best use of funding to ensure Adults are able to live independently in the community with the right wrap around support is crucial. The Commissioning Strategy</p>	<p><b>Actions</b></p> <ol style="list-style-type: none"> <li>1. Funding will be used to increase fees, increase capacity and reduce waiting times; specifically supplement the 4% uplift to bed-based providers of nursing and dementia care.</li> <li>2. £1.01m to reduce adult social care waiting times by</li> </ol>

<sup>3</sup> <https://www.skillsforcare.org.uk/Adult-Social-Care-Workforce-Data/Workforce-intelligence/publications/national-information/The-state-of-the-adult-social-care-sector-and-workforce-in-England.aspx>

<sup>4</sup> <https://www.bbc.co.uk/news/uk-63177547>

<sup>8</sup> We recognise that individuals within this broad range of protected characteristics of older people may have more than one protected characteristic and may fall into other multiple additional groups e.g. race, religion or belief, gender, sexual orientation, marriage or civil partnerships.

Service Users				
Budget Change Proposal	Summary of the information and data gathered, including through engagement and consultation	Protected Characteristics / Additional Groups	Summary of the assessment of the potential or actual impact on those who share the protected characteristics or are in the additional groups	Actions to further maximise the positive impact or minimise the negative impact  Arrangements for monitoring and review
	<p>offer higher wages and other incentives to the same potential workforce from where we would hope to recruit.</p> <p>Predictions from Skills for Care are telling us we need an extra 6700 posts (36%) in the 65+ market by 2035 (Skills for Care, 2022b<sup>5</sup>) but, like other areas, we find providers are struggling to recruit. Some of the reasons it is hard to attract and retain care staff is the perception of care is not valued in the</p>	<p>into other multiple additional groups e.g. veterans, carers, digital exclusion, geography (urban/rural areas), or other vulnerable groups of society.</p>	<p>will see a reduced reliance on bed-based care. We will need to continue to work with the VCS and Care providers to proactively respond and meet the needs and pressures e.g. recruitment and retention and competencies to meet more complex needs in people's homes. Any future changes to legislation e.g. Care Act Reform will only be enhanced by this approach as we support people to live in their own homes for longer.</p>	<p>investing further in the "Home First" initiatives to support people to go home after hospital stay with appropriate care, support and therapy.</p> <ol style="list-style-type: none"> <li>3. Continue to co-produce solutions with Partnership Boards.</li> <li>4. Health &amp; Social Care Framework and fee negotiations on an annual basis.</li> <li>5. Bed Based Contract specification reviewed with stakeholders to</li> </ol>

<sup>5</sup> <https://www.skillsforcare.org.uk/Adult-Social-Care-Workforce-Data/Workforce-intelligence/publications/local-information/My-ICS-area.aspx>

Service Users				
Budget Change Proposal	Summary of the information and data gathered, including through engagement and consultation	Protected Characteristics / Additional Groups	Summary of the assessment of the potential or actual impact on those who share the protected characteristics or are in the additional groups	Actions to further maximise the positive impact or minimise the negative impact  Arrangements for monitoring and review
	<p>public eye (78% of people unlikely to consider beginning a career in social care and 67% think it is undervalued by society (Anchor, 2018<sup>6</sup>) and that career progression does not follow an obvious path such as might be available in healthcare. These considerations were voiced by providers at our engagement events for the Fair Cost of Care exercise as well as our Provider Forums.</p>			<p>ensure future commissioning of bed-based care meets needs of people with complex needs have the right care and support from a competent workforce.</p> <p>6. Continue to manage contracts and improvements through our commissioning arrangements and operational teams.</p> <p>7. Continue to co-produce with providers the training</p>

<sup>6</sup> <https://www.anchor.org.uk/media/social-care-sector-unites-warn-impending-workforce-crisis-and-raise-perception-care#:~:text=1%2078%25%20of%20people%20unlikely%20to%20consider%20beginning,associated%20with%20being%20a%20%E2%80%98woman%E2%80%99s%E2%80%99%20>

Service Users				
Budget Change Proposal	Summary of the information and data gathered, including through engagement and consultation	Protected Characteristics / Additional Groups	Summary of the assessment of the potential or actual impact on those who share the protected characteristics or are in the additional groups	<p>Actions to further maximise the positive impact or minimise the negative impact</p> <p>Arrangements for monitoring and review</p>
	Further information about our Market Sustainability can be found in our MSP 2023 <sup>7</sup>			<p>offer on our Proud to Learn platform, as well as work with our Health colleagues to further rollout the Enhanced Health in Care Homes (EHCH) Framework and Proactive Care Framework taking an integrated approach.</p> <p>8. The Proud to Care recruitment and retention programme of work will continue to support market sustainability.</p> <p><b>Monitoring and Review</b></p>

<sup>7</sup> <https://www.gloucestershire.gov.uk/health-and-social-care/provider-information/>

Service Users				
Budget Change Proposal	Summary of the information and data gathered, including through engagement and consultation	Protected Characteristics / Additional Groups	Summary of the assessment of the potential or actual impact on those who share the protected characteristics or are in the additional groups	<p>Actions to further maximise the positive impact or minimise the negative impact</p> <p>Arrangements for monitoring and review</p>
				<p>7) Contract Monitoring of our care provider market will be undertaken by Brokerage Team and Contract Monitoring of our reablement and Home First offers will be undertaken by Integrated Commissioners to ensure no inequalities are faced in the delivery of our Care Act Duties and their assessed for needs.</p> <p>8) UEC Portfolio within Adults Transformation Programme</p>

Service Users				
Budget Change Proposal	Summary of the information and data gathered, including through engagement and consultation	Protected Characteristics / Additional Groups	Summary of the assessment of the potential or actual impact on those who share the protected characteristics or are in the additional groups	Actions to further maximise the positive impact or minimise the negative impact  Arrangements for monitoring and review
				<p>alongside the system wide “Working as One” programme will oversee improvements around hospital flow and prevention and early discharge.</p> <p>9) Systemwide working and integrated commissioning through Working as One Programme of work.</p>
<b>Activities to improve hospital discharge</b>	The Department for Levelling Up , Housing and Communities is providing this funding to support local authorities	<b>Protected Characteristics<sup>9</sup></b> <ul style="list-style-type: none"> <li>• Age</li> <li>• Disability</li> </ul>	<b>Neutral</b> No one within the protected characteristics groups will be disadvantaged with the	<b>Actions</b> 1. £2.807m to support additional brokerage capacity to manage contracts and

<sup>9</sup> We recognise that individuals within this broad range of protected characteristics of older people may have more than one protected characteristic and may fall into other multiple additional groups e.g. race, religion or belief, gender, sexual orientation, marriage or civil partnerships.

Service Users				
Budget Change Proposal	Summary of the information and data gathered, including through engagement and consultation	Protected Characteristics / Additional Groups	Summary of the assessment of the potential or actual impact on those who share the protected characteristics or are in the additional groups	Actions to further maximise the positive impact or minimise the negative impact  Arrangements for monitoring and review
	to build additional social care and community - based reablement capacity to reduce hospital discharge delays through delivering sustainable improvements to services for individuals.	<b>Additional Groups</b> We recognise that individuals characterised by age/disability characteristic may fall into other multiple additional groups e.g. veterans, carers, digital exclusion, geography (urban/rural areas), or other vulnerable groups of society.	proposed efficiencies or changes to ways of working in the Urgent and Emergency Care (UEC) Programme of work this programme is called "Working as One", which will see increased flow of people through the hospital and out following discharge. An Enhanced Independence Offer focussed on outcomes for people with the "re-abling" philosophy taking a person-centred approach to assessment, care planning and delivery that helps people remain at home and	improvements such as continued rollout of our Hyper localised Domiciliary Care brokerage to more areas. 2. Community equipment restructure and improvements 3. Housing schemes  <b>Monitoring and Review</b> 10) Contract Monitoring of our care provider market will be undertaken by Brokerage Team and Contract Monitoring of our reablement and Home First

Service Users				
Budget Change Proposal	Summary of the information and data gathered, including through engagement and consultation	Protected Characteristics / Additional Groups	Summary of the assessment of the potential or actual impact on those who share the protected characteristics or are in the additional groups	<p>Actions to further maximise the positive impact or minimise the negative impact</p> <p>Arrangements for monitoring and review</p>
			<p>living independently for longer will be the key enabler within the Working as One Programme.</p>	<p>offers will be undertaken by Integrated Commissioners to ensure no inequalities are faced in the delivery of our Care Act Duties and their assessed for needs.</p> <p>11)UEC Portfolio within Adults Transformation Programme alongside the system wide “Working as One” programme will oversee improvements around hospital flow and prevention and early discharge.</p>



<b>Service Users</b>				
<b>Budget Change Proposal</b>	<b>Summary of the information and data gathered, including through engagement and consultation</b>	<b>Protected Characteristics / Additional Groups</b>	<b>Summary of the assessment of the potential or actual impact on those who share the protected characteristics or are in the additional groups</b>	<b>Actions to further maximise the positive impact or minimise the negative impact</b>  <b>Arrangements for monitoring and review</b>
				12) Systemwide working and integrated commissioning through Working as One Programme of work.
<b>Revenue Cost Reductions (Savings)</b>				
None				
<b>Income Target</b>				
<b>Income 3% Increase</b> Review of fees and charges in line with inflation		All	To ensure that fees and charges keep pace with the true cost of providing services	<b>Actions</b> Where relevant a specific Equality Impact Assessment will be undertaken to consider the equality impact as detailed proposals are developed

3.3 – The Proposed Changes: Capital

<b>Service Users</b>				
<b>Capital Programme</b>	<b>Summary of information and data gathered, including through consultation and engagement</b>	<b>Protected Characteristics / Additional Groups</b>	<b>Summary of assessment of the potential or actual impact on those who share the protected characteristics or are in the additional groups</b>	<b>Actions to further maximise the positive impact or minimise the negative impact</b>  <b>Arrangements for monitoring and review</b>
<b>Capital Cost Increases (Investment)</b>				
None				

### 3.4 The Proposed Changes: Workforce

As at 30 September 2023, 4,244 individuals were employed by the County Council, including employees from the Gloucestershire Fire and Rescue Service, but excluding those individuals who are engaged on casual or temporary contracts. The relevant workforce equality reporting is available online ([here](#)) including the Annual Workforce Equality, Diversity and Inclusion Report.

The proposals within this year's MTFs do not require large scale workforce change. There are a number of proposals which increase staffing to support the delivery of services including increasing the capacity to support the delivery of the council's equality objectives. There are also individual proposals which may require some local service restructuring and therefore may impact the nature and number of roles. The Council provides a toolkit and specialist HR (Human Resources) advice to assist managers when planning restructures and other organisational change projects. This helps to ensure that the process of change management is carried out fairly and on an equitable and transparent basis, incorporating the principles of the Public Sector Equality Duty and other statutory requirements. This toolkit is kept under review and updated as necessary to ensure it remains relevant and legally compliant. The Council proactively seeks to minimise compulsory redundancy via the use of redeployment. Where service organisational changes involve alterations to buildings or office accommodation, the Council ensures that the design of such changes comply with accessibility standards together with making reasonable adjustments to support the workforce to undertake their roles.

The Council will continue to support the retention of staff. To achieve this, we offer and promote a range of flexible working practices and family friendly policies as well as agile working. We continue to operate voluntary purchase of additional leave and voluntary reduction to working hour's schemes, which were initially launched in 2013 and have been extended due to their popularity. We also provide several sacrifice schemes and other staff benefits. We actively promote our hard to fill professional roles and are reviewing our pay and reward scheme to ensure that it is fit for purpose and attracts a wide range of candidates including those with protected characteristics. We are a Disability Confident employer and have signed the Race at Work charter.

The Council communicates and engages with staff through a variety of processes including employee voice groups, staff networks, formal consultation and negotiations with Trade Unions, internal communications channels and team meetings.

The Council is in the third year of the three-year action plan and continues to develop actions for the future; this includes having regard to the Equality Framework for Local Government to inform the future equality strategies. We have employee networks for black, Asian and minority ethnic employees; employees with caring responsibilities; employees with disabilities; lesbian, gay, bisexual and transgender employees and young employees. The Dignity at Work


network is one of the initial points of contact for any employee who believes they are experiencing bullying and harassment in the workplace.


The Employee Networks have continued to engage and support workforce equality projects alongside our colleagues in Human Resources and Organisational Development. The Employee Networks provided input on this Workforce Equality Report, providing feedback on the findings, suggesting recommendations, and agreeing terminology.

Support is provided through the Occupational Health and Safety services, including professional face to face counselling to support staff in appropriate cases. The Council continues to sign up to the Mindful Employer Charter and the Occupational Health team keeps support and advice under review to enable managers and staff to have relevant information available. A Health and Wellbeing Action Plan was agreed in 2023 and this is currently being implemented.

During the pandemic, we have piloted programmes to proactively encourage employees to improve their health and reduce the potential for future physical and mental health problems. Some of these programme are on-going. We have also introduced MIND (managing mental health at work) training for all managers. In addition, we have proactively worked with managers to help them support their teams recognising that this was a very difficult period for many individuals and families, and this has had an impact on both physical and mental health.

#### 4. Approval

Signature of Executive Director	
Name of Executive Director	Sarah Scott Executive Director of Adult Social Care, Wellbeing and Communities
Date	21 <sup>st</sup> December 2023

Signature of Cabinet Member	
Name of Cabinet Member	Cllr Lynden Stowe Deputy Leader and Cabinet Member for Finance and Change
Date	24 January 2024

---