

EQUALITY IMPACT ASSESSMENT

The **Equality Act 2010** places a ‘**General Duty**’ on all public bodies to have ‘**due regard**’ to the need to:

- Eliminating discrimination, harassment and victimisation and any other conduct prohibited under the Act
- Advancing equality of opportunity for those with ‘protected characteristics’ and those without them
- Fostering good relations between those with ‘protected characteristics’ and those without them.

In addition the Council complies with the Marriage (same sex couples) Act 2013.

Stage 1 – Screening

Please complete the equalities screening form. If screening identifies that your proposal is likely to impact on protected characteristics, please proceed to stage 2 and complete a full Equality Impact Assessment (EqIA).

Stage 2 – Full Equality Impact Assessment

An EqIA provides evidence for meeting the Council’s commitment to equality and the responsibilities under the Public Sector Equality Duty.

When an EqIA has been undertaken, it should be submitted as an attachment/appendix to the final decision making report. This is so the decision maker (e.g. Cabinet, Committee, senior leader) can use the EqIA to help inform their final decision. The EqIA once submitted will become a public document, published alongside the minutes and record of the decision.

Please read the Council’s Equality Impact Assessment Guidance before beginning the EqIA process.

1. Responsibility for the Equality Impact Assessment

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|---|------------------------------|
| Name of proposal | The LAC Sufficiency Strategy |
| Service area | Strategic Commissioning Unit |
| Officer completing assessment | Yasmin Drakes |
| Equalities/ HR Advisor | Hugh Smith |
| Cabinet meeting date (if applicable) | 6 th March 2018 |
| Director/Assistant Director | Charlotte Pomery |

2. Summary of the proposal

Please outline in no more than 3 paragraphs

- The proposal which is being assessed
- The key stakeholders who may be affected by the policy or proposal
- The decision-making route being taken

The proposal being assessed is the Looked After Children's Sufficiency Strategy which defines how Haringey Council will meet its statutory duty to ensure that there is sufficient accommodation for looked after children (LAC) that meets their needs and is within the local authority area. The strategy sets out the objectives designed to ensure that CYP can remain at home wherever feasible or they can be cared for in stable environments which meet their needs and enables them to return home where this is in their best interests. To achieve this, children's services and the strategic commissioning unit will work with other partners and councils to strengthen our edge of care offer, grow the in-house fostering provision, improve the commissioning of specialist placements and build better pathways to adulthood.

The key stakeholders affected by this strategy will be Haringey's looked after children cohort.

The LAC Sufficiency Strategy will first be circulated at DMT on the 5th February 2018. Following this it will be presented to SLT on the 13th February 2018 and Cabinet on the 6th March 2018.

3. What data will you use to inform your assessment of the impact of the proposal on protected groups of service users and/or staff?

Identify the main sources of evidence, both quantitative and qualitative, that supports your analysis. Please include any gaps and how you will address these

This could include, for example, data on the Council's workforce, equalities profile of service users, recent surveys, research, results of relevant consultations, Haringey Borough Profile, Haringey Joint Strategic Needs Assessment and any other sources of relevant information, local, regional or national. For restructures, please complete the restructure EqIA which is available on the HR pages.

| Protected group | Service users | Staff |
|---------------------|---|-------|
| Sex | Data from Mosaic including the fostering data set, findings from the Children's Analysis Tool (CHAT) and the Census 2011. | |
| Gender Reassignment | Data is not collected on this characteristic for LAC and there is no national data available. | |
| Age | Data from Mosaic including the | |

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|-----------------------------------|---|--|
| | fostering data set, findings from the Children's Analysis Tool (CHAT), CLA benchmarking tool and the Census 2011. | |
| Disability | Data from Mosaic including the fostering data set, findings from the Children's Analysis Tool (CHAT), data from the SEND service and the Census 2011. | |
| Race & Ethnicity | Data from Mosaic including the fostering data set, findings from the Children's Analysis Tool (CHAT), CLA benchmarking tool and the Census 2011. | |
| Sexual Orientation | ONS Vital Statistics files. | |
| Religion or Belief (or No Belief) | Data from Mosaic and the Census 2011. | |
| Pregnancy & Maternity | Data from the Census 2011 and Haringey's Joint Strategic Needs Assessment. | |
| Marriage and Civil Partnership | N/A. | |

Outline the key findings of your data analysis. Which groups are disproportionately affected by the proposal? How does this compare with the impact on wider service users and/or the borough's demographic profile? Have any inequalities been identified?

Explain how you will overcome this within the proposal.

Further information on how to do data analysis can be found in the guidance.

Key Data Findings:

Sex

- 62% of LAC are males, which is significantly higher than the number of under 18 males in Haringey (51%). This indicates that males are overrepresented among those impacted by the strategy.

Gender Reassignment

- We do not hold data on the number of people who are seeking, receiving or have received gender reassignment surgery, and there is no national data collected for this characteristic. The Equality and Human Rights Commission estimate that there are between 300,000-500,000 transgender people in the UK. We will need to consider the inequalities and discrimination experienced for this protected group.

Age

- The strategy will primarily affect children. In comparison to the wider Haringey 0-17 population (in which 15% are 15-17 years old), the largest proportion of LAC are in the 15-

17 years age bracket (38%). This indicates that overall adolescents are overrepresented among those impacted by this strategy. However, in regards to adoption, 79% of LAC adopted in 2017 were aged 4 and below. This echoes national trends, whereby 72% of children adopted were in the 1 to 4 year old age category. This highlights that the actions within the Strategy focused on adoptions, will primarily effect the younger cohort of looked after children. However, the Strategy does include plans to increase the number of adoptive parents for older children.

Disability

- 4.5% of looked after children have a disability compared to 4.09% of the Haringey 0-18 population (2014). This indicates that the strategy will not disproportionately impact disabled children, however the strategy seeks to ensure the appropriate provision is available for children with disabilities who are looked after.

Race & Ethnicity

- Children of black (black African/Caribbean/black British) ethnicity represent the largest ethnic group of looked after children in Haringey (43%), which is more than the percentage of black under 18s in the borough (22%). This demonstrates that the actions to improve outcomes for LAC will primarily affect children of black ethnicity. Following this children of white ethnicity comprise 31% of the looked after cohort in comparison to 50% of the wider 0-17 Haringey population and LAC of mixed/multiple ethnicity are the third largest ethnic group, constituting 14% of looked after children and 14% of the borough's 0-17 population. This indicates that children of white ethnicity are underrepresented to an extent in the LAC cohort.
- Despite children of black ethnicity representing the largest ethnic group within the LAC cohort, they are underrepresented in the cohort of children adopted. In 2017 1% of LAC were adopted and of black ethnicity. In comparison, 4% of children adopted were of white ethnicity. The Strategy identifies this underrepresentation and sets out plans to increase the number of adoptive parents of black ethnicity.

Sexual Orientation

- We do not hold data on the sexual orientation of LAC. However, the ONS estimates that 3.7% of Haringey's population are lesbian, gay or bisexual (LGB), which is the 15th largest LGB community in the country. We will need to ensure that the inequalities and discrimination experienced by LGB people are considered.

Religion or Belief (or no belief)

- 45.6% of LAC have a religion specified as unknown/not stated therefore it is difficult to accurately assess the impact of the strategy on this protected characteristic. Christianity is the most commonly listed religion, comprising 26.7% of the LAC population followed by Islam which accounts for 12.2% of the LAC cohort. This reflects the population of Haringey, where Christianity is the most common religion (43% of the population) followed by Islam (11%). From these findings, it is reasonable to conclude that Muslim children are overrepresented to some extent among the LAC cohort.

Pregnancy & Maternity

- We do not hold a data set on children who become parents while in care due to the low frequency of these occasions. ONS data indicates that nationally, children in care are more at risk of teenage pregnancy. In Haringey, teenage pregnancy amongst children in care has been low but increases with age, with care leavers being more at risk. 36.4% of Haringey's Family Nurse Partnership clients (first time teenage mothers referred before 26 weeks of pregnancy) are currently, or have been historically children in care or care leavers.

Marriage & Civil Partnership

- Looked after children cannot be married or in a civil partnership.

Due to the composition of Haringey's LAC cohort the strategy will disproportionately affect males, adolescents and children from a black ethnic background. However, the policy will have a positive impact on all of Haringey's children in care and proposes changes which will increase placement supply, improve outcomes and give the entire cohort the best start in life regardless of their protected characteristics. Therefore, no inequalities have been identified.

4. a) How will consultation and/or engagement inform your assessment of the impact of the proposal on protected groups of residents, service users and/or staff?

Please outline which groups you may target and how you will have targeted them

Further information on consultation is contained within accompanying EqIA guidance

Looked after children are regularly consulted on individual placement decisions at their LAC review meetings and engage frequently with their Independent Reviewing Officers about their placement plans. Therefore, a separate consultation was not undertaken in the development of this strategy as this proposal focuses on the market development actions which will achieve the levels of placement quality and sufficiency required to meet the needs of our LAC.

Prior to the delivery of the actions and projects in the implementation plan, consultations with the relevant groups will take place. The groups that will be targeted include looked after children, care leavers, foster carers and providers of residential and semi-independent accommodation. They will be targeted through a range of methods including workshops, focus groups, informal interviews and surveys. For example, in preparation for the delivery of the new foster carers support and training package referenced in the strategy, foster carers were engaged in an informal group interview to establish the potential impact on foster carers and looked after children cohort.

4. b) Outline the key findings of your consultation / engagement activities once completed, particularly in terms of how this relates to groups that share the protected characteristics

Explain how will the consultation's findings will shape and inform your proposal and the decision making process, and any modifications made?

The engagement activity that will commence prior to the implementation of each project will shape the strategy by ensuring that all proposed actions do not have any adverse effects on groups with protected characteristics. The strategy's implementation plan will be modified and updated as each individual project is consulted on.

5. What is the likely impact of the proposal on groups of service users and/or staff that share the protected characteristics?

Please explain the likely differential impact on each of the 9 equality strands, whether positive or negative. Where it is anticipated there will be no impact from the proposal, please outline the evidence that supports this conclusion.

Further information on assessing impact on different groups is contained within accompanying EqlA guidance

1. Sex - This proposal will primarily affect male looked after children as they form the largest proportion of LAC. The proposal will ensure that children in care of both sexes will have better quality placements, suited to their needs and guarantees greater placement sufficiency.

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|----------|---|----------|--|----------------|--|----------------|--|
| Positive | X | Negative | | Neutral impact | | Unknown Impact | |
|----------|---|----------|--|----------------|--|----------------|--|

2. Gender reassignment - We do not have local data regarding this protected characteristic. We do not think there will be specific impacts for this protected group and will try to ensure that discrimination, harassment and victimisation is tackled based upon this and any other protected group.

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|----------|--|----------|--|----------------|--|----------------|---|
| Positive | | Negative | | Neutral impact | | Unknown Impact | x |
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3. Age - This proposal will primarily affect 15-17 year old looked after children as they form the largest proportion of LAC. The strategy will ensure that LAC of all ages will have better quality placements suited to their needs and that their progression is in-line with their non-looked after peers.

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| Positive | X | Negative | | Neutral impact | | Unknown Impact | |
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4. Disability - This proposal will not disproportionately impact disabled looked after children, as children with disabilities constitute 4.5% of the LAC population. However, the proposal will ensure that children in care with and without disabilities will have better quality placements suited to their needs.

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| Positive | X | Negative | | Neutral | | Unknown | |
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| | | | | impact | | Impact | |
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5. Race and ethnicity - This proposal will primarily affect black/ black African/ black Caribbean/ black British looked after children as they form the largest proportion of LAC. The proposal will ensure that children in care of all races and ethnicities will have better quality placements suited to their needs and will guarantee greater placement sufficiency.

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|----------|---|----------|--|----------------|--|----------------|--|
| Positive | X | Negative | | Neutral impact | | Unknown Impact | |
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6. Sexual orientation - We do not have local data regarding this protected characteristic. We do not think there will be specific impacts for this protected group and will try to ensure that discrimination, harassment and victimisation is tackled based upon this and any other protected group.

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|----------|--|----------|--|----------------|--|----------------|---|
| Positive | | Negative | | Neutral impact | | Unknown Impact | X |
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7. Religion or belief (or no belief) -The proposal will increase placement sufficiency and ensure that children in care of all religions and beliefs (including children with no beliefs or where their belief has not been stated) will have better quality placements suited to their needs.

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|----------|---|----------|--|----------------|--|----------------|--|
| Positive | X | Negative | | Neutral impact | | Unknown Impact | |
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8. Pregnancy and maternity - The proposal will seek to ensure that all children in care, including CYP who are pregnant or with children, will have better quality placements suited to their needs. This will be achieved through the provision of specialist young parents foster, residential and semi-independent placements where necessary. However as there is no data set for LAC who become parents the impact of the strategy on this group cannot be accurately assessed.

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|----------|--|----------|--|----------------|--|----------------|---|
| Positive | | Negative | | Neutral impact | | Unknown Impact | X |
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9. Marriage and Civil Partnership – People who are in a civil partnership will be treated the same as people who are married for all parts of the strategy

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|----------|-----|----------|--|----------------|---|----------------|--|
| Positive | N/A | Negative | | Neutral impact | X | Unknown Impact | |
|----------|-----|----------|--|----------------|---|----------------|--|

10. Groups that cross two or more equality strands e.g. young black women - The proposal will ensure that children in care, including children that cross two or more equality strands will have access to better quality and increased sufficiency of placements. These groups include, but are not limited to, young black males, young children with disabilities, children with disabilities from an ethnic minority background and females from an ethnic

minority background.

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| Positive | X | Negative | | Neutral impact | | Unknown Impact | |
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Outline the overall impact of the policy for the Public Sector Equality Duty:

- **Could the proposal result in any direct/indirect discrimination for any group that shares the protected characteristics?**
- **Will the proposal help to advance equality of opportunity between groups who share a protected characteristic and those who do not?**

This includes:

- a) **Remove or minimise disadvantage suffered by persons protected under the Equality Act**
- b) **Take steps to meet the needs of persons protected under the Equality Act that are different from the needs of other groups**
- c) **Encourage persons protected under the Equality Act to participate in public life or in any other activity in which participation by such persons is disproportionately low**
- **Will the proposal help to foster good relations between groups who share a protected characteristic and those who do not?**

The proposal will not result in direct or indirect discrimination for any group that shares the protected characteristics and the assessment indicates that the strategy will have a positive impact on the majority of the protected groups.

The strategy will advance equality of opportunity between groups who share a protected characteristic and those who do not by ensuring that both cohorts receive the best start to life and are accommodated in care placements which progress their development. The actions contained in the strategy will take steps to meet the needs of persons protected under the equality act that may be different from the needs of alternate groups by ensuring that provision developed for LAC is tailored to their individual requirements. For example, to ensure equality of opportunity for a child with a religious belief, the strategy makes plans to increase the supply of placements that can match and support the child's religious needs. The strategy aims to provide appropriately matched placements for all LAC who share a protected characteristic.

The proposal will foster good relations between cohorts sharing a protected characteristic and those who do not by ensuring that both groups are given placements and opportunities of equal quality.

6. a) What changes if any do you plan to make to your proposal as a result of the Equality Impact Assessment?

Further information on responding to identified impacts is contained within accompanying EqIA guidance

| Outcome | Y/N |
|---|-----|
| <p>No major change to the proposal: the EqIA demonstrates the proposal is robust and there is no potential for discrimination or adverse impact. All opportunities to promote equality have been taken. <u>If you have found any inequalities or negative impacts that you are unable to mitigate, please provide a compelling reason below why you are unable to mitigate them.</u></p> | Y |
| <p>Adjust the proposal: the EqIA identifies potential problems or missed opportunities. Adjust the proposal to remove barriers or better promote equality. Clearly <u>set out below</u> the key adjustments you plan to make to the policy. If there are any adverse impacts you cannot mitigate, please provide a compelling reason below</p> | |
| <p>Stop and remove the proposal: the proposal shows actual or potential avoidable adverse impacts on different protected characteristics. The decision maker must not make this decision.</p> | |

6 b) Summarise the specific actions you plan to take to remove or mitigate any actual or potential negative impact and to further the aims of the Equality Duty

| Impact and which protected characteristics are impacted? | Action | Lead officer | Timescale |
|--|--------|--------------|-----------|
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Please outline any areas you have identified where negative impacts will happen as a result of the proposal but it is not possible to mitigate them. Please provide a complete and honest justification on why it is not possible to mitigate them.

N/A

6 c) Summarise the measures you intend to put in place to monitor the equalities impact of the proposal as it is implemented:

To monitor the equalities impact of the proposal, the outcomes and of looked after children will continue to be regularly monitored by children's services and commissioning. The impact of the proposal will be demonstrated through performance data that is regularly collected from Mosaic including LAC reports, the fostering data set and the monthly ChAT data.

7. Authorisation

EqlA approved by Charlotte Pomery
(Assistant Director)

Date 19/02/18



8. Publication

Please ensure the completed EqlA is published in accordance with the Council's policy.

Please contact the Policy & Strategy Team for any feedback on the EqlA process.