

Equality Impact Assessment / Equality Analysis

(Updated December 2022)

Item name	Details
Title of service or policy	Bath SEND Residential Unit
Name of directorate and service	People and Communities
Name and role of officers completing the EIA	Kate Potter and Wendy Gyde
Date of assessment	22/11/2023

Equality Impact Assessment (or 'Equality Analysis') is a process of systematically analysing a new or existing policy or service to identify what impact or likely impact it will have on different groups within the community. The main aim is to identify any discriminatory or negative consequences for a particular group or sector of the community, and also to identify areas where equality can be better promoted. Equality impact Assessments (EIAs) can be carried out in relation to services provided to customers and residents as well as employment policies/strategies that relate to staffing matters.

This toolkit has been developed to use as a framework when carrying out an Equality Impact Assessment (EIA) or Equality Analysis. **Not all sections will be relevant – so leave blank any that are not applicable.** It is intended that this is used as a working document throughout the process, and a final version will be published on the Council's website.

1.1 Identify the aims of the policy or service and how it is implemented

Key questions	Answers / notes
<p>1.1 Briefly describe purpose of the service/policy e.g.</p> <ul style="list-style-type: none"> ● How the service/policy is delivered and by whom ● If responsibility for its implementation is shared with other departments or organisations ● Intended outcomes 	<p>B&NES Council is proposing to develop a 12-bed residential unit on Bath College site delivered jointly by Bath College, Adult Social Care and SEN, on completion of build to be run by Bath College. Intended outcomes are to deliver Preparing for Adulthood outcomes for young people with high needs attending the college, in terms of independent living skills training and links to employment in the local community. Also to provide respite for some adult social care clients.</p>
<p>1.2 Provide brief details of the scope of the policy or service being reviewed, for example:</p> <ul style="list-style-type: none"> ● Is it a new service/policy or review of an existing one? ● Is it a national requirement?). ● How much room for review is there? 	<p>This is a new service, to provide residential unit and supported living accommodation for young people aged 16 – 25 who are enrolled with Bath College and who have an EHCP. There is currently no similar service within B&NES.</p>

<p>1.3 Do the aims of this policy link to or conflict with any other policies of the Council?</p>	<p>The unit will improve the lives of young people with SEND as well as potentially older disabled age groups, by providing a much needed local residential educational and respite facility in the Radstock area. This will address the climate crisis by reducing the need for out-of-county travel.</p> <p>The unit will prepare for the future by enabling local services to develop as they are needed by local people and by the Council, as this type of provision could also be developed as a mirror provision in the Bath area campus at a later date, as part of the Local First Strategy for both social care and SEND teams. It will deliver for local residents by creating a local option for young people who currently access out-of-county, residential independent education settings due to a current lack of local provision. It will also provide a flexible approach as the unit will be available for respite at weekends and holidays, which could also benefit older social care clients. It will prevent these expensive out-of-county placements and provide VFM by achieving high revenue savings for the Council.</p> <p>The unit will address one of the key commitments in the Corporate Strategy to: Enhance local provision for children and young people with Special Educational Needs and Disabilities (SEND) to reduce the need for more distant and costly specialist placements. It will also serve as a way to streamline processes to deliver services locally and effectively, by bringing different services together to avoid duplication of effort, and explore better ways to jointly deliver and design those services with a focus on meeting local needs and VFM.</p>
---	---

2. Consideration of available data, research and information

Key questions	Data, research and information that you can refer to
<p>2.1 What equalities training have staff received to enable them to understand the needs of our diverse community?</p>	<p>All staff have attended mandatory equalities training available on the Council's Learning Pool. The Lead Officer, Rosemary Collard, has worked in SEND for 20 years and is very familiar with the SEND Code of Practice.</p> <p>All college staff also have mandatory</p>

<p>2.2 What is the equalities profile of service users?</p>	<p>Of 15 sample population: 9 male, 4 female, 1 transgender female All A1 White British except 1 male = E4, 1 male B4 (any other mixed background) and one male E2 (any other ethnic group – White Br/White Australian). Age range 16-25. This represents 8% of the total Bath College High Needs student population (</p>
<p>2.3 Are there any recent customer satisfaction surveys to refer to? What were the results? Are there any gaps? Or differences in experience/outcomes?</p>	<p><u>Lifestyle</u> Parents were contacted and asked for their opinions on a possible residential unit at Bath College:</p> <ul style="list-style-type: none"> • There was nothing in Bath when we were looking and were forced to go out of county. As a result, the yp has lost contact with friends and is finding it hard to return to B&NES. Would have liked this option to be available. • Marvellous idea yp already at college so to have this in site would be easy due to familiarity. • Beneficial for yp to gain independence. Huge opportunity to trial living away from home as a step towards independent or supported living.
<p>2.4 What engagement or consultation has been undertaken as part of this EIA and with whom? What were the results?</p>	<p>Soft consultation as above, support from programme co-ordinator, speaking to Head of Education Inclusion.</p>
<p>2.5 If you are planning to undertake any consultation in the future regarding this service or policy, how will you include equalities considerations within this?</p>	<p>Formal consultation will include questions on protected characteristics to understand who is responding, and whether any protected characteristics are likely to be impacted either negatively or positively.</p>

3. Assessment of impact: 'Equality analysis'

Based upon any data you have considered, or the results of consultation or research, use the spaces below to demonstrate you have analysed how the service or policy:

- Meets any particular needs of equalities groups or could help promote equality in some way.
- Could have a negative or adverse impact for any of the equalities groups

Key questions	Examples of what the service has done to promote equality	Examples of actual or potential negative or adverse impact and what steps have been or could be taken to address this
3.1 Issues relating to all groups and protected characteristics	The service is not intending to discriminate based on this protected characteristic. The service is intended to be open to both sexes.	The service sample population reflected 2/3s male and 1/3 female, which is in line with SEN population as a whole.
3.2 Sex – identify the impact/potential impact of the policy on women and men.	The service is not intending to discriminate based on this protected characteristic. The service is intended to be open to young people who are pregnant. The service is dependent on their education status.	If the EHCP and care plan specifies that they need some input to access education, then this will be provided in order to support their continued access to education provision.
3.3 Pregnancy and maternity	The service is not intending to discriminate based on this protected characteristic.	The gender reassignment process can impact on mental health needs. The service is often aware of the pronoun requirements of young people. This is highlighted as part of the EHCP process and the service is very supportive and experienced in young people going through gender reassignment or exploring their gender identity. Spaces are all unisex and gender neutral including bedrooms and toilets.
3.4 Gender reassignment – identify the impact/potential impact of the policy on transgender people	The service has been designed in order to fulfil a local capacity gap for young people with complex needs who are currently underserved and often need to move considerable distances from their families in order to receive support.	This service will be positively discriminating disabled young people, as the service will be primarily for young people with complex needs. It is not anticipated that individuals with solely physical or sensory needs will be accessing the service.
3.5 Disability – identify the impact/potential impact of the policy on disabled people (ensure consideration both physical, sensory and mental impairments and mental health)	The service has been designed in order to fulfil a local capacity gap for young people with complex needs who are currently underserved and often need to move considerable distances from their families in order to receive support.	The service is going to discriminate on age, as it will be primarily for ages 16 – 25. There will be some flexibility in out of term time support, where older age groups could use it.

<p>3.6 Age – identify the impact/potential impact of the policy on different age groups</p>	<p>The service is not intending to discriminate based on this protected characteristic.</p>	<p>There is a mix of ethnic groups but mainly A1 White British (rep of local population in Radstock).</p>
<p>3.7 Race – identify the impact/potential impact on across different ethnic groups</p>	<p>The service is not intending to discriminate based on this protected characteristic. Sexual orientation is taken into account within these services, for example gender neutral toilets.</p>	<p>There is no expected negative impact on this protected characteristic.</p> <p>There will be no facility for either same sex or heterosexual couples as bedrooms are single.</p>
<p>3.8 Sexual orientation – identify the impact/potential impact of the policy on lesbian, gay, bisexual, heterosexual people</p>	<p>The service is not intending to discriminate based on this protected characteristic.</p>	<p>The service would support provision for married / civil partnered couples, if required.</p>
<p>3.9 Marriage and civil partnership – does the policy/strategy treat married and civil partnered people equally?</p>	<p>The service is not intending to discriminate based on this protected characteristic.</p>	<p>The service would support the religious beliefs of young people, including food, prayer requirements etc. There is access to the Sanctuaries (prayer spaces) across the college and also there is a visiting Chaplain time.</p>
<p>3.10 Religion/belief – identify the impact/potential impact of the policy on people of different religious/faith groups and also upon those with no religion.</p>	<p>The service is not intending to discriminate based on this characteristic. The service will be based in Radstock which is a local area of deprivation. The service is intending to develop as a community Hub which could support the local community, as there will be a community café and other potential social enterprises linked to the service.</p>	<p>Adult services are obliged to carry out financial assessments for people who receive support, so there is a potential that some young people being supported by adult services may be charged for this support. This is financially assessed.</p>
<p>3.11 Socio-economically disadvantaged* – identify the impact on people who are disadvantaged due to factors like family background, educational attainment, neighbourhood,</p>	<p>The service is not intending to discriminate based on this characteristic. The service will be based in Radstock which is a local area of deprivation. The service is intending to develop as a community Hub which could support the local community, as there will be</p>	<p>There is not anticipated to be a negative impact on people in Radstock. Radstock Town centre offers a central bus route to many areas including Bath and Bristol. There are many rural areas surrounding Radstock which has historically made it difficult to access services based in</p>

<p>employment status can influence life chances (this is not a legal requirement, but is a local priority).</p>	<p>a community café and other potential social enterprises linked to the service.</p>	<p>Bath or Keynsham. Local families will not need to travel long distances to access this service.</p>
<p>3.12 Rural communities* identify the impact / potential impact on people living in rural communities</p>	<p>The service is not intending to discriminate based on this characteristic. The service will be based in Radstock which is a local area of deprivation. The service is intending to develop as a community Hub which could support the local community, as there will be a community café and other potential social enterprises linked to the service.</p>	<p>There is not anticipated to be a negative impact on people in Radstock. Radstock Town centre offers a central bus route to many areas including Bath and Bristol. There are many rural areas surrounding Radstock which has historically made it difficult to access services based in Bath or Keynsham. Local families will not need to travel long distances to access this service.</p>
<p>3.13 Armed Forces Community ** serving members; reservists; veterans and their families, including the bereaved. Public services are required by law to pay due regard to the Armed Forces Community when developing policy, procedures and making decisions, particularly in the areas of public housing, education and healthcare (to remove disadvantage and consider special provision).</p>	<p>The service is not intending to discriminate based on this characteristic. In allocating the places, these factors will be taken into consideration if appropriate and in line with the duties of the SEND Code of Practice.</p>	<p>There is not anticipated to be a negative impact on the armed forces community, as this status will be held in due regard on allocation of the residential and college places for young people with Education, Health and Care Plans.</p>

*There is no requirement within the public sector duty of the Equality Act to consider groups who may be disadvantaged due to socio economic status, or because of living in a rural area. However, these are significant issues within B&NES and have therefore been included here.

** The Equality Act does not cover armed forces community. However, the Armed Forces Bill (which came in on 22 Nov 2022) introduces a requirement to pay 'due regard' to make sure the Armed Forces Community are not disadvantaged when accessing public services.

4. Bath and North East Somerset Council & NHS B&NES Equality Impact Assessment Improvement Plan

Please list actions that you plan to take as a result of this assessment/analysis. These actions should be based upon the analysis of data and engagement, any gaps in the data you have identified, and any steps you will be taking to address any negative impacts or remove barriers. The actions need to be built into your service planning framework. Actions/targets should be measurable, achievable, realistic and time framed.

Issues identified	Actions required	Progress milestones	Officer responsible	By when
N/A				

5. Sign off and publishing

Once you have completed this form, it needs to be 'approved' by your Divisional Director or their nominated officer. Following this sign off, send a copy to the Equalities Team (equality@bathnes.gov.uk), who will publish it on the Council's and/or NHS B&NES' website. Keep a copy for your own records.

Signed off by: Chris Wilford (Divisional Director or nominated senior officer)
Date: 23/2/23