

## Brent Council Equality Analysis Form

<b>1. Roles and Responsibilities:</b>	
<p><b>Directorate:</b></p> <p><b>Children &amp; Families</b></p> <p><b>Service Area:</b></p> <p>Commissioning</p>	<p><b>Person Responsible:</b></p> <p>Name: Marcelle Farrow</p> <p>Title: Senior Commissioning &amp; Contracts Officer</p> <p>Contact No: 020 8 937 3136</p> <p>Signed:</p>
<p><b>Name of policy:</b></p> <p><b>Semi Independent Policy &amp; Procedures</b></p>	<p><b>Date analysis started:</b></p> <p>December 2013</p> <p><b>Completion date</b></p> <p>24.1.14</p> <p><b>Review date:</b></p>
<p><b>Is the policy:</b></p> <p>New <input type="checkbox"/> Old <input checked="" type="checkbox"/></p>	<p><b>Auditing Details:</b></p> <p>Name :Elizabeth Bryan</p> <p>Title: Partnership Equality Policy Officer</p> <p>Date 11.12.13</p> <p>Contact No: 0208 937 1190</p> <p>Signed:</p>
<p><b>Signing Off Manager:</b> responsible for review and monitoring</p> <p>Name: Elzanne Smit</p> <p>Title: Interim Head of Commissioning</p> <p>Date: 24.1.14</p> <p>Contact No: 0208 937 4382</p> <p>Signed:</p> 	<p><b>Decision Maker:</b></p> <p>Committee:</p> <p><b>Executive</b></p> <p>Date:</p> <p><b>17 February 2014</b></p>

**2. Brief description of the policy. Describe the aim and purpose of the policy, what needs or duties is it designed to meet? How does it differ from any existing policy or practice in this area?**

This EIA is in respect of re-commissioning the provision of semi-independent accommodation for looked after children and care leavers. This is going out to tender in February 2014.

In accordance with the Children's Act 1989, 2004 and the Children Leaving Care Act 2000 it is the Local Authority's responsibility to ensure every care leaver is properly prepared in making the transition from child to adulthood in a planned and effective way to achieve the best possible outcomes for the individual young person.

The block contract is for semi-independent accommodation and support to vulnerable looked after young people aged 16-18 years & care leavers over the age of 18 based in the London Borough of Brent, some of whom are young unaccompanied asylum seekers new to the UK. Officers are aware that the block purchase price is competitive compared to the rest of the market, offset to an extent by the Council having to pay for 'void' beds.

The London Borough of Brent entered into a block contract with Centrepont on the 29<sup>th</sup> January 2013, commissioning 11 units at Kingshill and 6 units at Canning Road. Centrepont works in conjunction with its Registered Social Provider, Genesis. Since January 2013 to date 19 young people have been accommodated at Centrepont of which 83% left the service engaged in education, employment and training. 90% of this client group have immigration and language needs.

Prior to Brent's acquisition of Centrepont's block contract significant work had been undertaken to secure alternative accommodation and support for young people using the service, 97 providers have been contacted directly in an effort to secure accommodation and services of good quality and best value. The current contract includes 5 hours support per week per young person.

The aims of the service are to:

- Improve the quality of semi independent provision for the Local Authority's looked after children 16 to 18 years and care leavers.
- To ensure all the Local Authority's looked after children and care leavers are provided by accommodation that is safe and supported by key workers in helping them develop key skills and confidence to enable them to live independently.
- To provide support to the young people in helping them to achieve better outcomes through education, training and health.

The service will also contribute to achieving the following objectives and strategic priorities:

- Support the Council in meeting its statutory responsibilities in ensuring every child is properly prepared in making the transition from child to adulthood in a planned and effective way to achieve the best possible outcomes for the individual looked after child and care leavers.
- Accelerate the rate of improvement in under achieving groups, narrowing and eliminating gaps.
- Ensure young people are able to access the same support, training and life chances as others.

**3. Describe how the policy will impact on all of the protected groups:**

Overall, there will continue to be a positive impact on the looked after children and care leavers due to the following components which make up the service specification as outlined below:

- This policy would impact on providing accommodation for looked after children and care leavers to address varying levels of needs
- To provide support to looked after young people and care leavers at risk of homelessness

to achieve independence

- The support will enable those young people to develop the skills and confidence to live independently, and to access longer term sustainable housing
- To provide specialist learning support (this will meet the needs of young people with a learning disability or language requirement) to young people in accessing and maintaining education, employment and training.
- To establish effective partnership working and to support young people to engage with services they need to improve their health and well-being, to stay safe, and to develop their independent living skills.
- To provide young people with services appropriate to their diverse needs, taking into account cultural difference, ethnicity, faith, disability, and sexuality. This is particularly beneficial for unaccompanied asylum seekers who may require additional support.
- Ensure vulnerable young people are able to access the same education, training, health and life chances as others so equipping them with the relevant tools and aids to allow them to realise their potential.
- No adverse impacts have been identified for any groups on the grounds of race / gender / disability / faith / sexual orientation / health/ pregnancy and maternity / age / gender reassignment and sex.
- **At present we have 26 looked after children (8 female, 18 male) and 34 care leavers (12 female; 22 male) in semi-independent accommodation.**

**Please give details of the evidence you have used:**

In accordance with the Children's Act 1989, 2004 and the Children Leaving Care Act 2000 it is the LA's responsibility to ensure every child is properly prepared in making the transition from child to adulthood in a planned and effective way to achieve the best possible outcomes for the individual young person.

The aim of the service provision is in line with Brent's Corporate Strategy where it is in the interests of the child to be looked after by the Authority we will provide a stable, consistent and caring environment.

The development of the service is based on consultation with social workers in Care Planning and service users.

**4. Describe how the policy will impact on the Council's duty to have due regard to the need to:**

**(a) Eliminate discrimination (including indirect discrimination), harassment and victimisation;**

This service is designed to reduce any adverse impact on looked after young vulnerable people and care leavers whose transition to semi independent living is challenging given their complex backgrounds, cultural difference, ethnicity and emotional difficulties. The additional support they receive will increase the young people's confidence and skills which will equip them with the relevant tools and aids to allow them to realise their potential.

**(b) Advance equality of opportunity;**

This service is designed to reduce any adverse impact on looked after young vulnerable people and care leavers whose transition to semi independent living is challenging given their complex

backgrounds, cultural difference, ethnicity and emotional difficulties. The additional support they receive will increase the young people's confidence and skills encouraging them to avail education, training and the need to improve their health and well being. These tools will aid them to realise their potential.

### **(c) Foster good relations**

The service has been developed using an inclusive approach designed to ensure that vulnerable young people regardless of their background receive appropriate support to enable them to interact with other young people in their accommodation, key workers, engage in training, health and education.

## **5. What engagement activity did you carry out as part of your assessment?**

No formal consultation has been undertaken as part of the assessment; however feedback from young people via their social workers and social workers themselves was taken into account during the preparation of the service specification. The views from a care leaver who lives in semi-independent accommodation. There have been conversations with the Participation Worker, Head of Care Planning, the Virtual Head and Independent Reviewing Officer. Discussions have been undertaken with colleagues in the West London Alliance who provide similar services to young people.

Engagement and feedback of looked after children and young people and care leavers are led by Children in Care Participation Officers who hold the following forums:

- a) Care in Action weekly meeting with Brent employed Participation Officers
- b) Regional All Party Parliamentary Group quarterly meetings where Brent looked after children and care leavers who discuss issues with MPs, professionals and young people from other Boroughs
- c) Three seats for looked after children and care leavers on the Brent Youth Parliament to represent Children in Care Council.
- d) Independent Reviewing Officers meet looked after children every six weeks
- e) Health looked after children reviews are held once every six months also attended by Independent Reviewing Officer
- f) There is a Brent Charter for looked after children and a Care Leavers Charter
- g) There is a resident LAC sexual health nurse who conducts extensive training with keyworkers in semi independent provision and advises young people

### **i. Who did you engage with?**

Looked after children and care leavers; Social Workers and managers; virtual head; participation worker; Independent Reviewing Officer; colleagues in West London Alliance.

### **ii. What methods did you use?**

Brent Pledge Questionnaire survey was sent out in 2013 on line and by mail. Informal discussions and feedback by Social Workers, Social Work Assistants and managers at the 18+ panel. Discussions with the Participation worker and reviewing officer.

### **iii. What did you find out?**

Semi-independent living accommodation will not be suitable for all children in care and care leavers. It provides a stepping stone to living independently for some young people. Others prefer to stay with their foster carers or in their residential units for longer. Semi-independent accommodation offers young people the opportunity to prepare and practice their independent living skills to live successfully on their own when they reach 18 years of age. Unaccompanied asylum seeking children especially tend to be more self-sufficient

and prefer to live independently before some of the British looked after children or care leavers. Young people welcome a level of key working support in addition to the Social Work support to ensure that they apply for the right benefits and access resources appropriately. A good key worker can make a big difference to a young person's life. Social Workers and other professionals encourage young people to remain in foster care of residential until they've completed their statutory education as it is a more supportive and structured environment. It is important to ensure that those living together in the house are the right combination of young people as personality, cultural or lifestyle differences could have a major impact on young people living together harmoniously and a young person feeling safe and secure. Consistency amongst providers and localised accommodation is important.

**iv. How have you used the information gathered?**

The Brent Pledge Survey Report was considered at the Corporate Parenting Board and informs Looked After Children Strategy in terms of Young People's priorities. The Looked After Children's strategy sets out the commitment of Brent to source localised, secure semi-independent provision for children and young people.

**v. How has it affected your policy?**

Semi-independent provision is sourced locally or close to Brent. When it is identified that the plan for a young person is to be moved to semi-independent provision, consideration is given to the other occupants to ensure that it will be a good match. All looked after children and care leavers up to the age of 18 receive a minimum of 5 hours key work support and this is often more. Post 18 young people can also receive key working support if it is considered necessary by the Social Worker. Quality assurance checks are made to the provision by Commissioning and Resources and the young people's views are sought as part of this evaluation. A block contract promotes consistency to young people.

**6. Have you identified a negative impact on any protected group, or identified any unmet needs/requirements that affect specific protected groups? If so, explain what actions you have undertaken, including consideration of any alternative proposals, to lessen or mitigate against this impact.**

This service is designed to reduce any adverse impact on looked after young vulnerable people and care leavers whose transition to semi independent living is challenging given their complex backgrounds, cultural difference, ethnicity and emotional difficulties. The additional support they receive will increase the young people's confidence and skills encouraging them to avail education, training and the need to improve their health and well being. These tools will aid them to realise their potential.

As demonstrated by the consultation evidence, consistency can be a concern as well as location. When young people are placed together, consideration has to be given to their respective personalities, lifestyles and cultural backgrounds as this has caused difficulties at times. When a young person is engaged in a criminal lifestyle, this could have implications regarding safety for other young people.

**Please give details of the evidence you have used:**

Positively, 2013 – 2014 data demonstrates that of the looked after young people and care leavers who were provided with accommodation and support by Centrepont, 83% left the service engaged in education, employment and training. 90% of this client group have immigration and language needs.

**7. Analysis summary**

Please tick boxes to summarise the findings of your analysis.

Protected Group	Positive impact	Adverse impact	Neutral
Age	✓		
Disability			✓
Gender re-assignment			✓
Marriage and civil partnership			✓
Pregnancy and maternity			✓
Race	✓		
Religion or belief			✓
Sex			✓
Sexual orientation			✓

**8. The Findings of your Analysis**

Please complete whichever of the following sections is appropriate (one only).

**No major change**

*Your analysis demonstrates that:*

- *The policy is lawful*
- *The evidence shows no potential for direct or indirect discrimination*
- *You have taken all appropriate opportunities to advance equality and foster good relations between groups.*

*Please document below the reasons for your conclusion and the information that you used to make this decision.*

The service provision will:

- Improve the quality of semi independent provision for the Local Authority's looked after children 16 to 18 years and care leavers.
- Ensure all the Local Authority's looked after children and care leavers are accommodated in a safe environment and supported by key workers in helping them develop key skills and confidence to enable them to live independently.
- To provide support to the young people in helping them to achieve better outcomes through education, training and health.

The above service delivery is necessary to promote equal access to the service and to ensure we do everything we can to remove barriers and eliminate adverse impact on any specific group.

Justification for taking these measures also stems from:

- Brent Corporate Strategy
- Children Act 1989 & 2004
- Children Leaving Care Act 2000

**Adjust the policy**

*This may involve making changes to the policy to remove barriers or to better advance equality. It can mean introducing measures to mitigate the potential adverse effect on a particular protected group(s).*

*Remember that it is lawful under the Equality Act to treat people differently in some circumstances, where there is a need for it. It is both lawful and a requirement of the public sector equality duty to consider if there is a need to treat disabled people differently, including more favourable treatment where necessary.*

*If you have identified mitigating measures that would remove a negative impact, please detail those measures below.*

*Please document below the reasons for your conclusion, the information that you used to make this decision and how you plan to adjust the policy.*

**Continue the policy**

*This means adopting your proposals, despite any adverse effect or missed opportunities to advance equality, provided you have satisfied yourself that it does not amount to unlawfully discrimination, either direct or indirect discrimination.*

*In cases where you believe discrimination is not unlawful because it is objectively justified, it is particularly important that you record what the objective justification is for continuing the policy, and how you reached this decision.*

*Explain the countervailing factors that outweigh any adverse effects on equality as set out above:*

*Please document below the reasons for your conclusion and the information that you used to make this decision:*

**Stop and remove the policy**

*If there are adverse effects that are not justified and cannot be mitigated, and if the policy is not justified by countervailing factors, you should consider stopping the policy altogether. If a policy shows unlawful discrimination it must be removed or changed.*

*Please document below the reasons for your conclusion and the information that you used to make this decision.*

**9. Monitoring and review**

Please provide details of how you intend to monitor the policy in the future.  
Please refer to stage 7 of the guidance.



- The service will be monitored on a weekly basis in the form of keyworker reports to quarterly basis where the LA will visit the provider sites to monitor whether contractual obligations are being met and quality of care provided.
- The service will have minimum sleep in cover overnight to monitor young people are safe within the accommodation.

The provider will be required to collate the following information (this is not an exhaustive list):

- Weekly key worker reports on each young person outlining key tasks undertaken and outcomes.
- Monthly progress reports on each young person covering support needs and risks; actions in place and progress.
- Quarterly monitoring visits by Commissioning and Resources to monitor whether contractual obligations are being met and quality of care provided.
- Yearly evaluation of the service provided.
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In addition to the quarterly monitoring, where feasible, spot visits will be carried out to ensure the consistency and accessibility of the service.

## 10. Action plan and outcomes

At Brent, we want to make sure that our equality monitoring and analysis results in positive outcomes for our colleagues and customers.

Use the table below to record any actions we plan to take to address inequality, barriers or opportunities identified in this analysis.

Action	By when	Lead officer	Desired outcome	Date completed	Actual outcome