

Equalities Analysis Assessment

(NB: this EAA is covers the RAA Service. Staffing EAA to be completed post consultation)

1. Proposal Summary Information

EAA Title	Adopt London West Regionalised Adoption Agency
Please describe your proposal?	Project
Is it HR Related?	Yes. An Equality Analysis Assessment for staff will be completed in a separate document.
Corporate Purpose	Cabinet Decision

1. What is the Project looking to achieve? Who will be affected?

In June 2015, the Department for Education published a paper 'Regionalising Adoption' which set out proposals for the establishment of Regional Adoption Agencies (RAAs). The Education and Adoption Act 2016 re-enforced these proposals and if Local Authority Adoption Agencies have not planned to become part of a Regionalised Adoption Agency by 2020 they can be directed to do so by the Government. At December 2018 in England there were 11 'live' Regionalised Adoption Agencies covering 53 local authorities with work continuing across the country to develop Regionalised services.

London will be formed of four local authority Adopt London Regions. These are Adopt London North hosted by Islington, Adopt London South hosted by Southwark, Adopt London East hosted by Havering and Adopt London West hosted by Ealing. It is intended that some functions such as Commissioning will be carried out at a Pan London level to ensure best value for money.

In the Adopt London West Region in 2017 – 2018 26 families were approved to adopt; 40 children were adopted, and 300 families received post order support services.

As a result of these changes, the Government expects to see improved timeliness in the matching and placement of children for adoption, increased sufficiency in adopters and higher quality support to adoptive families. In the west region it has been agreed that Special Guardianship support services will also be included in the Adopt London West service. Therefore, those affected by these changes are:

- Children in need of or likely to need adoptive families.
- Adopted children.
- Adults who have been adopted.
- Families wishing to adopt.
- Adoptive families.
- Birth families whose child has been adopted.
- Special Guardians and children subject to Special Guardianship Orders.

2. What will the impact of your proposal be?

It is proposed that the London boroughs of Brent, Ealing, Hounslow, Hammersmith and Fulham, the Royal Borough of Kensington and Chelsea and the City of Westminster will form a Regional Adoption Agency known as 'Adopt London West', with Ealing acting as host Local Authority. To comply with their statutory duties under the Adoption and Children Act 2002, Brent, Ealing and Hounslow each currently offer an adoption service. The adoption services for Hammersmith and Fulham, Kensington and Chelsea and Westminster are joined and offered through the Triborough Shared Service. Therefore, four services in west London currently undertake similar work to recruit adopters, family find for children and offer support to families.

The West London local authorities have high performing adoption services which are relatively small. Across the five west London services 40 children were adopted in the year 2017 – 2018 which represents an average of eleven children per service. During 2017 - 2018 26 families were approved to adopt, and adoption and special guardianship support was offered to approximately 300 families. There is currently a national shortage of families who are approved to adopt and an imbalance in the number of children waiting and families for them.

A Practice Audit of 'live' RAAs (DfE September 2018) found that there are some 'green shoots' emerging which can be attributed to regionalisation. There is evidence of a larger pool of adopters being available to children and a greater focus on earlier identification of children who may need adoptive families and early placement.

It is proposed that by offering one adoption and special guardianship support service instead of the four services currently in place families who wish to adopt will receive a more consistent response and children in need of adoption will be placed more speedily with in house families. By pooling the expertise in adoption and special guardianship support work the quality of services offered to adoptive and special guardianship families will be improved.

2. Impact on Groups having a Protected Characteristic

AGE: *A person of a particular age or being within an age group.*

State whether the impact is positive, negative, a combination of both, or neutral:

Describe the Impact

Children - positive

In the Adopt London West London region, adoption is generally considered for children in care between the ages of 0 and 8 years old. Family finding tends to take longer for children over five years old and for larger sibling groups (DfE Practice Audit September 2018). On the National Adoption Register on 03.12.2018 there were 1070 children waiting for adoption and only 370 families and there is currently a serious shortage of families coming forward to adopt.

'Early permanence' is considered for all children with a Plan for Adoption but particularly for unborn babies and very young children. Early permanence means that children are placed for adoption as soon as possible which promotes the development of secure attachments for children who have already had adverse pre-birth experiences.

By establishing one shared adoption service a wider pool of adopters will be available for all children waiting for adoption. Drawing on shared adoption expertise will lead to more effective family finding campaigns for the children who tend to wait longer will be implemented.

It is also envisaged that Adopt London West will work closely with the other Adopt London Agencies so that the learning from work undertaken can be shared. The Practice Audit of existing RAAs has shown some evidence of more effective work in this area. Children would therefore benefit from timelier placement for adoption.

Adopters – neutral

People wishing to adopt must be over 21 years of age. Although prospective adopters must be physically and mentally fit to meet the needs of adopted children there is no upper age limit, and this will not change as a result of the Adopt London West RAA project.

Birth family members and adopted adults – neutral Moving to the Adopt London West model will have no impact on birth family members, adopted adults or special guardians.
Alternatives and mitigating actions which have been considered in order to reduce negative effect:
Describe the Mitigating Action
There is no negative impact envisaged because of age.

DISABILITY: <i>A person has a disability if s/he has a physical or mental impairment which has a substantial and long-term adverse effect on their ability to carry out normal day to day activities¹.</i>
State whether the impact is positive, negative, a combination of both, or neutral:
Describe the Impact
<p>Children - positive</p> <p>Children placed for adoption will have adverse background experiences such as parental mental ill health or exposure to drug or alcohol misuse which can impact on their longer-term health and development. Children with disabilities are placed for adoption but they tend to be amongst the group of children who wait longest to be placed.</p> <p>A regional adoption agency will widen the pool of adopters available to children with additional needs and disabilities. Rather than each local authority undertaking work to recruit adopters, shared expertise in adoption work will be drawn on to plan targeted marketing and recruitment activity and to encourage more families to come forward. One regional agency will facilitate a clear offer to adoptive families across West London which encourages families to come forward to adopt children who wait longest and provide targeted support to those who commit to adopting children with a disability or additional needs.</p> <p>Adopters – Neutral</p> <p>Having a disability does not mean that families cannot adopt a child. Prospective adopters would need to demonstrate that their disability would not prevent them from parenting a child throughout their minority.</p> <p>Birth family members and adopted adults - positive</p> <p>By pooling adoption and special guardianship support services it is envisaged that a more consistent approach to support for both groups when disability is a factor.</p>
Alternatives and mitigating actions which have been considered in order to reduce negative effect:
Describe the Mitigating Action
It is not envisaged that there will be a negative impact due to disability. Additional services may need to be considered on a case by case basis, initially, but a more strategic response can be developed as due to the benefit of scale if applicable. A consistent approach will be offered across west London.

GENDER REASSIGNMENT: <i>This is the process of transitioning from one sex to another. This includes persons who consider themselves to be trans, transgender and transsexual.</i>
State whether the impact is positive, negative, a combination of both, or neutral:
Describe the Impact
There is no accurate data on the extent of the trans population in the UK due to the absence of consistent monitoring. The absence of research means that we do not know how many trans people have been approved to adopt or have been adopted. It is therefore not currently possible to comment on this area.

¹ Due regard to meeting the needs of people with disabilities involves taking steps to take account of their disabilities and may involve making reasonable adjustments and prioritizing certain groups of disabled people on the basis that they are particularly affected by the proposal.

Alternatives and mitigating actions which have been considered in order to reduce negative effect:
Describe the Mitigating Action
None as this stage due to lack of data. The regional adoption agency will comply with its duties under the Equality Act 2010 and will promote non-discriminatory practice with all the parties affected by adoption and in need of special guardianship support.

RACE: <i>A group of people defined by their colour, nationality (including citizenship), ethnic or national origins or race.</i>
State whether the impact is positive, negative, a combination of both, or neutral:
Describe the Impact
<p>Children – positive</p> <p>Children who are of BME background tend to wait longer to be placed for adoption. At 3rd December 2018 the Adoption Register recorded that nationally 71% of the children on the register are white UK children and 29% BME. These figures are reversed in London with 26% WUK and 74% BME children being on the register. In West London at December 2018 57% of the children were of BME descent and 33% of WUK descent with the remaining 10% being of other ethnicities.</p> <p>Across west London considerable efforts have been made to recruit more BME adoptive families. Instead of four services duplicating work and competing for a small number of families targeted recruitment campaigns could be undertaken. A consistent approach to preparation and support will be offered to BME families and families who are able to adopt a child from a different ethnic background to their own.</p> <p>Adopters – positive</p> <p>Efforts would be made to recruit more families of BME background. Families should not be discriminated against on the grounds of race or ethnicity and there should be no negative impact. The Adoption Service in West London would offer a consistent adoption support services which is likely to encourage families to come forward to adopt (Cousins 2008) In West London access to a support group for BME families has been offered and work will be done to continue this in the new service</p> <p>Birth family members and adopted adults – neutral</p> <p>There should be no negative impact on these groups.</p>
Alternatives and mitigating actions which have been considered in order to reduce negative effect:
Describe the Mitigating Action
None – moving towards a Regional Adoption Agency will not have any actual or potential negative impact because of race. Work will however be needed to ensure access to support groups for these families.

RELIGION & BELIEF: <i>Religion means any religion. Belief includes religious and philosophical beliefs including lack of belief (for example, Atheism). Generally, a belief should affect a person's life choices or the way you live for it to be included.</i>
State whether the impact is positive, negative, a combination of both, or neutral:
Describe the Impact
<p>Children - positive</p> <p>Profiling of children waiting across the Adopt London West region, including religious beliefs, to enable more targeted recruitment of families who reflect children's religious background or who are able to promote this.</p>
Alternatives and mitigating actions which have been considered in order to reduce negative effect:
Describe the Mitigating Action
None – moving towards a Regional Adoption Agency will not have any actual or potential negative impact because of religion or belief. More focussed data collection will take place which will include religion and recruitment work

undertaken as a result of any identified need.

SEX: *Someone being a man or a woman.*

State whether the impact is positive, negative, a combination of both, or neutral:

Describe the Impact

Children – neutral

The National Adoption Register indicates that there are slightly more boys waiting for adoption than girls at 56% vs 44%. In the west London area at December 2018 there were slightly more girls (53%) than boys waiting.

Adopters - positive

Across the Adopt London West region applications are accepted regardless of sex from both female and male single and two parent households. Consultation with adopters across London has indicated that families can receive inconsistent information about eligibility criteria. By pooling resources, a consistent response will be offered regarding criteria and support for families.

Birth family members, special guardians and adopted adults – neutral

No negative impact has been identified on these groups because of the formation of the Adopt London West region.

Alternatives and mitigating actions which have been considered in order to reduce negative effect:

Describe the Mitigating Action

None – moving towards a Regional Adoption Agency will not have any actual or potential negative impact because of sex.

SEXUAL ORIENTATION: *A person's sexual attraction towards his or her own sex, the opposite sex or to both sexes.*

State whether the impact is positive, negative, a combination of both, or neutral:

Describe the Impact

Adopters – neutral

Applications to adopt are accepted from same sex families and this is reflected in the profile of families who are approved and waiting. In the Adopt London West Region, a number of agencies have worked with We Are Family which is an organisation that supports same sex adopters and foster carers. Agencies have also specifically campaigned to encourage more applications from this group. This work would continue a wider basis in a regional service and a consistent approach to adoption support offered.

Birth family members, special guardians and adopted adults – neutral

No negative impact on these groups has been identified as a result of the formation of the Adopt London West region.

Alternatives and mitigating actions which have been considered in order to reduce negative effect:

Describe the Mitigating Action

None – moving towards a Regional Adoption Agency will not have any actual or potential negative impact because of sexual orientation.

PREGNANCY & MATERNITY: *Description: Pregnancy: Being pregnant. Maternity: The period after giving birth - linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, including as a result of breastfeeding.*

State whether the impact is positive, negative, a combination of both, or neutral:

Describe the Impact

Birth family members – positive

Birth parents who relinquish their child for adoption or whose child is placed for adoption following care proceedings will receive a more consistent approach to counselling and support and help with contact arrangements. Instead of individual boroughs providing this service, a shared service and commissioning support services across the London region will mean that additional support could be provided to this group.
Alternatives and mitigating actions which have been considered in order to reduce negative effect:
Describe the Mitigating Action
None – moving towards a Regional Adoption Agency will not have any actual or potential negative impact because of pregnancy or maternity.

MARRIAGE & CIVIL PARTNERSHIP: <i>Marriage: A union between a man and a woman. or of the same sex, which is legally recognised in the UK as a marriage</i> <i>Civil partnership: Civil partners must be treated the same as married couples on a range of legal matters.</i>
State whether the impact is positive, negative, a combination of both, or neutral:
Describe the Impact
Adopters – neutral Applications to adopt are accepted from heterosexual and same sex married couples and civil partners and this would continue to be the case in a regional adoption agency.
Alternatives and mitigating actions which have been considered in order to reduce negative effect:
Describe the Mitigating Action
None – there would be no negative impact because of marriage or civil partnership as a result of moving towards a Regional Adoption Agency.

3. Human Rights²
4a. Does your proposal impact on Human Rights as defined by the Human Rights Act 1998?
Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
4b. Does your proposal impact on the rights of children as defined by the UN Convention on the Rights of the Child?
Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
4c. Does your proposal impact on the rights of persons with disabilities as defined by the UN Convention on the rights of persons with disabilities?
Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
(If yes, please describe the effect and any mitigating action you have considered.)

² For further guidance please refer to the Human Rights & URNC Guidance on the Council Equalities [web page](#).

4. Conclusion

Overall Regionalisation will have a positive impact on the lives of children through providing a unified service offer, pooling resources and access to shared expertise and reduced duplication of work. The impact of this will be more targeted recruitment and support and more timely placements for children and particularly for older children, sibling groups and children of BME background.

For adoptive families' consistent information will be available about the adoption process and support services. By pooling resources commissioning of support services can take place on a larger scale and offer consistency.

Special Guardians undertake a crucial task but are often a group who do not receive the support that they need. The west London regional adoption agency will include Special Guardianship support which will provide an opportunity of offer improved services to this group.

Birth family members will have access to support services that are offered in a consistent way regardless of which west London local authority placed their child for adoption. There will be opportunities to consider additional groups and services based on larger numbers across the west London local authority area.

4a. What evidence, data sources and intelligence did you use to assess the potential impact/effect of your proposal? Please note the systems/processes you used to collect the data that has helped inform your proposal. Please list the file paths and/or relevant web links to the information you have described.

Relevant legislation includes:

the Children Act 1989, Children Act 2004, the Adoption and Children Act 2002 and associated regulations.

Data sources and intelligence include:

Adoption Match – National Adoption Register - <https://www.adoptionmatch.org.uk/statistics/>

RAA Practice and Early Permanence Audit –Government Advisor on Adoption and Permanency (September 2018)

Finding Families (2008) Jennifer Cousins BAAF

5. Action Planning: *(What are the next steps for the proposal please list i.e. what it comes into effect, when migrating actions³ will take place, how you will measure impact etc.)*

Action	Outcomes	Success Measures	Timescales/ Milestones	Lead Officer (Contact Details)
Review the Equalities Impact Assessment	That all relevant areas have be sufficiently assessed and any mitigating action put in place.	No change in predicted outcomes or changes made in response to identified issues.	During and post implementation	Head of Service
There is currently an imbalance in the number of children waiting for adoption and approved adopters. There is an urgent need to recruit adopters in	Focussed marketing activity to encourage adopters to come forward and particularly adopters for older children, sibling groups and BME children.	The pool of approved adopters will be widened, and more families recruited for the children who wait longest.	During and post implementation	Head of Service

³ Linked to the protected characteristics above

general but specifically for children who tend to wait longer for adoption.				
Ensure systematic collection of data on the needs of children waiting in the Adopt London West Region.	Marketing and recruitment activity will be based on clear information about the needs of children waiting and particularly the needs of children who tend to wait longest to be adopted.	The number of adopters approved will be increased and the time that children wait for adoption reduced.	During and post implementation.	Head of Service
Ensure more systematic data collection on the support needs of Special Guardians.	Targeted support services will be put in place for this group.	Children and their special guardians will be supported.	During and post implementation.	Head of Service
Review position where data is lacking e.g. Gender Reassignment	Where data becomes available the service will be able to consider the equalities impact for specific groups.	The needs of all protected groups will be considered.	During and post implementation	Head of Service
Additional Comments: None				

6. Sign off: *(All EAA's must be signed off once completed)*

Completing Officer Sign Off:	Service Director Sign Off:	HR related proposal <i>(Signed off by directorate HR officer)</i>
Signed:	Signed:	Signed:
Name (Block Capitals):	Name (Block Capitals):	Name (Block Capitals):
Date:	Date:	Date:

For EA's relating to Cabinet decisions: received by Committee Section for publication by (date):

Appendix 1: *Legal obligations under Section 149 of the Equality Act 2010:*

- As a public authority we must have due regard to the need to:
 - a) Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
 - b) Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
 - c) Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
- The protected characteristics are: AGE, DISABILITY, GENDER REASSIGNMENT, RACE, RELIGION & BELIEF, SEX, SEXUAL ORIENTATION, PREGNANCY & MATERNITY, MARRIAGE & CIVIL PARTNERSHIP
- Having due regard to advancing equality of opportunity between those who share a protected characteristic and those who do not, involves considering the need to:
 - a) Remove or minimising disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic
 - b) Take steps to meet the needs of persons who share a relevant characteristic that are different from the needs of the persons who do not share it.
 - c) Encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.
- Having due regard to fostering good relations between persons who share a relevant protected characteristic and persons who do not, involves showing that you are tackling prejudice and promoting understanding.
- Complying with the duties may involve treating some people more favourably than others; but this should not be taken as permitting conduct that would be otherwise prohibited under the Act.