

RMBC - Equality Analysis Form for Commissioning, Decommissioning, Decision making, Projects, Policies, Services, Strategies or Functions (CDDPPSSF)

Under the Equality Act 2010 Protected characteristics are age, disability, gender, gender identity, race, religion or belief, sexuality, civil partnerships and marriage, pregnancy and maternity. Page 6 of guidance. Other areas to note see guidance appendix 1	
Name of policy, service or function. If a policy, list any associated policies:	Closure of St Edmunds Residential Service for Looked After Children
Name of service and Directorate	Children & Young People Service
Lead manager	Linda Harper
Date of Equality Analysis (EA)	December 2015
Names of those involved in the EA (Should include at least two other people)	Jane Parfremment, Michelle Whiting, Sue Wilson, Bev Pepperdine, Sally Ann Baird-Fisher, Annette Marshall, Brent Lumley, Luke Ricketts, Brian Durham
Aim/Scope (who the Policy /Service affects and intended outcomes if known) See page 7 of guidance step 1 The aim of this analysis is to consider the impact of the closure of St Edmunds Children's Home. St Edmunds Children's home has been open as a residential service for looked after children in Rotherham for over 30 years and was a purpose built building with 2 properties being merged into one to accommodate young looked after children in Rotherham The annual budget for St Edmunds is £530,000 The budget forecast for 2015-2016 is £575,000 St Edmunds provides long-term care for young people with emotional and behavioural difficulties. The maximum number of placements is six. There are currently two young people presently living there, both these young people are over the age of 16. Ofsted review of the service in October 2015 graded the service inadequate. The service aims to provide a safe, nurturing, caring and homely environment for up to six young people aged between 10 to 18 years, and of either gender. The key objective of the service is to work with the young people and their families, with the support of partner agencies, with an overall aim of providing the stability and support they need to prepare them for transition to the responsibilities of adulthood. There are 16 members of staff (11.72 FTE) at St Edmunds home who may be affected by the proposal, and the council's policy and consultation process will apply i.e. seeking to avoid redundancy through redeployment where possible Privacy All young people who are placed in St Edmunds have their own room; and a key to their home room, to respect their privacy.	

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Staff, do not enter a young person's bedroom without consent unless there are serious health and safety concerns. A policy statement is in place regarding this principle and contracts agreed with the young people.

Dignity

Staff, are made aware of each child's racial, cultural, religious and dietary needs. Information is available about the various cultural, religious, dietary and ethnic provisions in the local area.

There are currently two young people placed at St Edmunds

St Edmunds Statement of Purpose was last revised and updated November 2015 (Appendix A)

What equality information is available? Include any engagement undertaken and identify any information gaps you are aware of. What monitoring arrangements have you made to monitor the impact of the policy or service on communities/groups according to their protected characteristics? See page 7 of guidance step 2

Equality and cultural information is captured as part of the assessment of all children who have been placed at St Edmunds.

The recipients of this service are looked after children, living in residential care.

The service reports that this service is running at 33% capacity.

The service reports that the neither of the 2 current residents are from an ethnic minority group.

St Edmunds is committed to promoting and upholding the rights of the young people at the home. These commitments are underpinned by the United Nations Rights of The Child and through the five outcomes from Care Matters Agenda

- Health – Young people have the right to good health and living a healthy lifestyle.
- Safe – Young people have the right to be protected from harm and neglect.
- Enjoy and achieve: young people have the right to education and leisure
- Making a positive contribution: young people have the right to participate in positive activities to develop personal and social skills, promote well-being and reduce behaviour that puts them at risk
- Economic well-being: young people have the right to a stand of living that meets their physical, mental, spiritual, moral and social needs

Engagement & Consultation

As a matter of public law and council policy, any proposal to close a facility will require a reasonable period of engagement and consultation with those affected by such a proposal. The latest government guidance on consultation principles confirms that the governing principle is proportional of the type and scale of consultation to the potential impacts of the proposal or decision being taken, and though needs to be given to achieving real engagement rather than merely following a bureaucratic process. The guidance indicates that the period of consultation will usually last between 2 and 12 weeks. The amount of time required for a consultation exercise should be decided on a

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case by case basis, and depends on the nature of the proposal, for example the diversity of interested parties or the complexity of the issue, the capacity of groups being consulted to respond or external events. With this in mind officers consulted with the following stakeholders and interested persons.

- Children and young people who are resident at the home (assisted by an independent advocate, if required)
- Parents, carers and connected persons of the above
- Independent Reviewing Officers
- Staff employed within the home and their trade unions
- Close geographical neighbours to the home

The purpose of the consultation was to gather the views and preferences of the consulted on the proposal and its implementation, and to understand where there are any possible unintended consequences of the proposal. In all the circumstances, and taking into account the Christmas holiday period, a period of 4 weeks consultation was agreed as proportionate and reasonable in this matter. The engagement/consultation undertaken is outline below

Engagement/consultation undertaken with customers. (date and group(s) consulted and key findings) See page 7 of guidance step 3

- Prior to consultation commencing in October 2015 a complaint was received from one resident living at St Edmunds. The basis of the complaint was they were not happy with the outcome of the Ofsted inspection and disagreed with Ofsted comments. Commissioning Manager visited the young person and covered the points of the complaint and explained what next steps could be taken. The young person took the option of closing the complaint
- 1st December 2015, two young people resident at the home were advised of the intention to seek Commissioner's approval on 7th December 2015 to begin formal consultation on the closure of St Edmunds
- 1st December 2015, parents, close family members, Independent Reviewing Officers and advocates for the two young people resident in the home were informed of the intention to seek Commissioner's approval on 7th December 2015 to begin formal consultation
- Consultation commenced on 7th December 2015 and closed on 4th January 2016
- 1st December 2015 personal letters were sent to 2 young people placed at St Edmunds to inform them that a period of consultation is commencing regarding the closure of this residential home and opportunity given to provide written feedback with the support of independent advocate if required by 4th January 2016
- 3rd & 17th December 2015, 2 Visits from Director of Safeguarding CYPS to talk personally with

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	residents • Two young people allocated with an advocate from Rights to Rights service who can assist the young people to express their views. One young person said she felt she did not need the support of an advocate to help her during this consultation period, she was happy with the allocated worker, but was aware that the advocacy service was there if it was needed. • Two young people allocated an Independent Reviewing Officer (IRO) who will carry out a review and make plans with them, where issues and concerns can be raised. Each young person has been involved in the planning for the future. The IRO has a statutory duty to ensure that the young person's needs are taken into account. • Clear timeline of events communicated with the young people, so they know when consultation commences, closes and when a decision will be made • For the consultation young people have been given five questions to give their responses to, which covers the closure, asking for their objections, asking where they would like to live, what support they will require – one young person provided responses to these questions and one young person declined to provide a response
Engagement undertaken with staff about the implications on service users (date and group(s) consulted and key findings) See page 7 of guidance step 3	• 1st December 2015 staff employed in the home and their trade unions were informed of the intention to seek Commissioner's approval on 7th December 2015 to begin formal consultation • December 2015 - Letters sent to all staff to inform them of the consultation around the closure of St Edmunds and offered the opportunity to provide their views on the consultation in writing by 4th January 2016 • December 2015 – Staff have had the opportunity to submit their views via their union representatives • Week commencing 14th December 2015 – staff offered individual consultation meetings • 21st December 2015 staff were offered the opportunity to attend a group consultation session with the Assistant Director, Safeguarding • 16th December - Letters sent to neighbours of

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	the property, explain the potential of the closure of St Edmunds • Between the period 1st December 2015 to 4th January no complaints or comments have been made to CYPS Complaints Team from either staff or residents regarding the consultation or closure of St Edmunds • Representatives from RMBC Human Resources supporting staff • Briefing to Corporate Parenting Panel - Appendix B
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The Analysis

How do you think the Service meets the needs of different communities and groups?

This service is in place to meet the needs of children who have become looked after. The age range for this service is ages 10 to 18 years. Young people at St Edmunds are provided with the opportunity for regular sporting, cultural or recreational activity. Where young people are already active members or attenders of an activity, staff at the home will do everything within reason to maintain this.

St Edmunds is located in Thurcroft in the Southeast of Rotherham. The village of Thurcroft where the home is located has a strong community vibe.

Analysis of the actual or likely effect of the Service:

See page 8 of guidance step 4 and 5

The two young people currently placed at St Edmunds will need to be found alternative placement. They have been kept informed through personal letters, visits from the Director and allocated workers, to assist identify alternative placements. Their views have been included in future plans.

Does your Policy/Service present any problems or barriers to communities or Group? *Identify by protected characteristics*

Does the Service/Policy provide any improvements/remove barriers?

Identify by protected characteristics

Barrier

Service Users – If this service provision is closed, then the needs of the 2 current residents will have to be reviewed and alternative placements found that will meet their needs

Service Users

- Will need to be involved in their review
- Their wish and feelings will need to be captured
- Their voice will need to be listened to and acted upon

Parents/Carers/Extended Family

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- Will need to be consulted with and the impact of any move in location taken into consideration. The council, being the Corporate Parent has a responsibility to encourage and support young people to maintain contact with their parents and siblings in a manner consistent with their care plan.

What affect will the Policy/Service have on community relations? Identify by protected characteristics

We don't envisage that there will be any impact on community relations or impact on community cohesion.

The local community will want to know what are the future plans for the building, therefore there needs to be clear communication with the local community on the plans to close the building, timescales and what will happen to the building

The building will need to be made safe and kept in good state of repair to ensure that the building is not used for unsatisfactory purposes, which could lead to community complaints.

Please list any **actions and targets** by Protected Characteristic that need to be taken as a consequence of this assessment and ensure that they are added into your service plan.

Website Key Findings Summary: To meet legislative requirements a summary of the Equality Analysis needs to be completed and published.

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Equality Analysis Action Plan - See page 9 of guidance step 6 and 7

Time Period 7th December 2015 to 4th January 2016

Manager: Linda Harper Service Area: Children & Young People Service – Looked After Children Tel:.....

Title of Equality Analysis:

If the analysis is done at the right time, i.e. early before decisions are made, changes should be built in before the policy or change is signed off. This will remove the need for remedial actions. Where this is achieved, the only action required will be to monitor the impact of the policy/service/change on communities or groups according to their protected characteristic.

List all the Actions and Equality Targets identified

Action/Target	State Protected Characteristics (A,D,RE,RoB,G,GI O, SO, PM,CPM, C or All)*	Target date (MM/YY)
Prior to closure of this provision, consultation will need to be carried out with children and young people who are resident at the home (they will be supported by an independent advocate)	All	4th January 2016
Assessment/Review of young people currently resident at St Edmunds regarding alternative placements. Service Manager & workers to monitor and carry out regular reviews after provision closes and alternative placement made	All	31st January 2016
Consult with parents, carers, family members and connected persons of any of the young people who are residents	All	4th January 2016
Consult with Rights to Rights Advocacy Service	All	4th January 2016
Consult with staff employed within the home and their trade unions in relation to the potential impact of the proposal on staff groups	All	4th January 2016
Communicate with local community on closure of building – what are the plans for next steps	All	4th January 2016

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Name Of Director who approved Plan	Nicole Chavaudra	Date	6/1/16

Website Summary – Please complete for publishing on our website and append to any reports to Elected Members, SLT or Directorate Management Teams

Completed equality analysis	Key findings	Future actions
Directorate: Children & Young People Service Proposal name: Closure of St Edmunds Function: Looked After Children Service Name of lead officer completing the assessment: Bev Pepperdine Date of assessment: 4th January 2016	Decision to close St Edmunds Based on findings from Ofsted Graded by Ofsted 12 October 2015 – Inadequate. Poor safeguarding practice Out of date risk assessments Lack of information relating to missing from home protocol practice Young people's health not monitored Kitchen area dirty Consultation Outcomes The consultation feedback has identified a number of issues that the council will take into account in planning for closure and future service delivery. However it does not provide any compelling evidence that the closure should not proceed. The key themes in relation to the consultation feedback are as follows: Young People 1 written response was received from a young person, this was provided with	Monitor and review young persons' future placements Support staff with future employment choices Building to be made safe and kept in good state of repair Communication to community/public on proposal for building

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Completed equality analysis	Key findings	Future actions
	support from their advocate Both young people attended the one-to-one sessions offered from Assistant Director • Both young people communicated that the period of consultation was too long and created additional anxiety for them, especially as it was over Christmas & New Year period • Both young people expressed that they feel staff at St Edmunds care for them and have provided them with stability • Both young people had views about their potential future placement options and this has been taken into account • View from one young person shared with the Head of Service for Looked After Residential, who met with the young person and offered reassurance • One young person expressed in the feedback that she would not want to be placed anywhere other than in Rotherham or one other location and would prefer a residential placement • One young person expressed that it	

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Completed equality analysis	Key findings	Future actions
	was not good timing, consultation before Christmas and no decision until after Christmas Staff There have been 5 written responses from staff and 2 staff members attended the group consultation session on 21st December. 8 staff members attended individual sessions to express their views • Some staff acknowledged that up to the Ofsted inspection in October 2015 they had not been able to meet the combined needs of the young people placed as well as they themselves would have wanted • Some staff expressed the view that the improvement activity that has occurred at the home has resulted in improved record keeping and standards • Staff felt that having 2 residents in recent months has allowed them to provide more focussed and individualised care. This has resulted in some staff expressing a view that the size and structure of St. Edmunds is not conducive to providing the level of care they	

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Completed equality analysis	Key findings	Future actions
	aspire to i.e. it is hard to get a good match and mix of young people when all beds are occupied and hard to individualise the responses to those young people • Some staff recognised that the current arrangement was not sustainable given the under occupancy and the cost of running a home of this size • Both staff and current residents have expressed a view that family care does not suit every child or young person and that future planning should consider provision based on 2 or 3 bed residential children's homes in the area so those children and young people whose needs are better met in a residential home can stay in Rotherham	

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Appendices

Appendix A	St Edmunds Avenue Children's Home Statement of Purpose	 St Edmunds Revised Statement of Purpose
Appendix B	Briefing for Corporate Parent Meeting December	 Consultation St Edmunds Corporate F