

## PART A - Initial Equality Screening Assessment

As a public authority we need to ensure that all our strategies, policies, service and functions, both current and proposed have given proper consideration to equality and diversity.

A **screening** process can help judge relevance and provide a record of both the process and decision. Screening should be a short, sharp exercise that determines relevance for all new and revised strategies, policies, services and functions.

Completed at the earliest opportunity it will help to determine:

- the relevance of proposals and decisions to equality and diversity
- whether or not equality and diversity is being/has already been considered, and
- whether or not it is necessary to carry out an Equality Analysis (Part B).

Further information is available in the Equality Screening and Analysis Guidance – see page 9.

1. Title		
<b>Title: My Own Place: Expanding Supported Living for Autistic People and People with a Learning Disability</b>		
<b>Directorate:</b> ACH&PH	<b>Service area:</b> Strategic Commissioning	
<b>Lead person:</b> Kay Nicholes, Strategic Commissioning Manager	<b>Contact number:</b> (01709) 822270	
Is this a:		
<input type="checkbox"/> Strategy / Policy	<input checked="" type="checkbox"/> Service / Function	<input type="checkbox"/> Other
<b>If other, please specify</b>		

2. Please provide a brief description of what you are screening
The Cabinet and Commissioner's Decision Making of 21 May 2018, approved the recommendations set out in the report 'The Transformation of Services and Support for People with a Learning Disability'. The report outlined the approach of moving away from the then existing building-based locations to alternative ways of delivering care and support in the local community.

Following the approval of this report, the Council has developed the ‘My Front Door’ approach, to ensure that the services which an individual accesses are more person centred and the individual has more role in shaping their support plan.

Following the approach set out in May 2018, the Council Cabinet considered an update report on 19 October 2020. The report outlined commissioning intentions for services for people with a Learning Disability and/or Autism. These commissioning intentions will strengthen independence, choice and control for people within Rotherham, and support the My Front Door programme. Cabinet will be asked to consider a further report on the 19 September 2022 in relation to the intentions for the further development of Supported Living Opportunities in Rotherham.

**3. Relevance to equality and diversity**

All the Council’s strategies/policies, services/functions affect service users, employees or the wider community – borough wide or more local. These will also have a greater/lesser relevance to equality and diversity.

The following questions will help you to identify how relevant your proposals are.

When considering these questions think about age, disability, sex, gender reassignment, race, religion or belief, sexual orientation, civil partnerships and marriage, pregnancy and maternity and other socio-economic groups e.g. parents, single parents and guardians, carers, looked after children, unemployed and people on low incomes, ex-offenders, victims of domestic violence, homeless people etc.

Questions	Yes	No
Could the proposal have implications regarding the accessibility of services to the whole or wider community?	X	
Could the proposal affect service users?	X	
Has there been or is there likely to be an impact on an individual or group with protected characteristics?	X	
Have there been or likely to be any public concerns regarding the proposal?		X
Could the proposal affect how the Council’s services, commissioning or procurement activities are organised, provided, located and by whom?	X	
Could the proposal affect the Council’s workforce or employment practices?		X

If you have answered no to all the questions above, please explain the reason

If you have answered **no** to all the questions above please complete **sections 5 and 6**.

If you have answered **yes** to any of the above please complete **section 4**.

**4. Considering the impact on equality and diversity**

If you have not already done so, the impact on equality and diversity should be considered within your proposals before decisions are made.

Considering equality and diversity will help to eliminate unlawful discrimination, harassment and victimisation and take active steps to create a discrimination-free society by meeting a group or individual’s needs and encouraging participation.

Please provide specific details for all three areas below using the prompts for guidance and complete an Equality Analysis (Part B).

- **How have you considered equality and diversity?**

*(think about the scope of the proposal, who is likely to be affected, equality related information, gaps in information and plans to address, consultation and engagement activities (taken place or planned) with those likely to be affected)*

These services are available to all appropriate groups regardless of their **Age, Gender reassignment, Marriage and civil partnership, Pregnancy and maternity, Race, Religion and belief, Sex, Sexual orientation.**

Data is available for 781 customers aged over 18 in the Learning Disability/Autism cohort accessing 1471 placements/services. Some customers access more than one service. Data is captured on the Adult Care LAS case management system. 206 of these customers live within a supported living setting.

The current specifications for services, already makes clear the Council’s expectations of providers in terms of Equality and Diversity.

The revised specifications will be co-produced with people who are accessing existing services in Rotherham and will also reflect Equality and Diversity requirements. A co-production plan has been developed to ensure that the appropriate agencies and customers are engaged in the development wherever possible and involved in the development of future models.

An Equality Analysis will provide an opportunity to consider in more detail the impact of the service changes and any necessary actions, taking into consideration all of the Protected Characteristics under the Equality Act 2010.

- **Key findings**

*(think about any potential positive and negative impact on different equality characteristics, potential to promote strong and positive relationships between groups, potential to bring groups/communities into increased contact with each other, perception that the proposal could benefit one group at the expense of another)*

The proposal to develop these services will have a positive impact on the different equality characteristics of the people who will access future supported living accommodation services. The proposal to increase the availability of supported accommodation will also provide increased choice and the specifications for the services will be developed through co-production with people who access the services.

<ul style="list-style-type: none"> <li>• <b>Actions</b> <i>(think about how you will promote positive impact and remove/reduce negative impact)</i></li> </ul> <p>The service specification requires that the service fully understands its role in promoting equality and diversity in the provision of the service and can describe how it will monitor and evidence this. The service specification will include the requirement to work to TLAP Making it Real I and We statements to ensure that the individual is fully involved in the design of the care and support they receive.</p> <p>The performance of the provider will be monitored over the length of the contract, as part of the Council's contract monitoring and quality assurance processes.</p>	
Date to scope and plan your Equality Analysis:	June 2022
Date to complete your Equality Analysis:	September 2022
Lead person for your Equality Analysis (Include name and job title):	Garry Parvin, Joint Head of Service, Learning Disability, Autism and Transition Commissioning

## 5. Governance, ownership and approval

Please state here who has approved the actions and outcomes of the screening:

Name	Job title	Date
Nathan Atkinson	Assistant Director, Strategic Commissioning	13/07/22

## 6. Publishing

This screening document will act as evidence that due regard to equality and diversity has been given.

If this screening relates to a **Cabinet, key delegated officer decision, Council, other committee or a significant operational decision** a copy of the completed document should be attached as an appendix and published alongside the relevant report.

A copy of **all** screenings should also be sent to [equality@rotherham.gov.uk](mailto:equality@rotherham.gov.uk) For record keeping purposes it will be kept on file and also published on the Council's Equality and Diversity Internet page.

<b>Date screening completed</b>	June 2022
<b>Report title and date</b>	My Own Place: Expanding Supported Living for Autistic People and People with a Learning Disability

Appendix 3

<b>If relates to a Cabinet, key delegated officer decision, Council, other committee or a significant operational decision – report date and date sent for publication</b>	
<b>Date screening sent to Performance, Intelligence and Improvement</b> <a href="mailto:equality@rotherham.gov.uk">equality@rotherham.gov.uk</a>	

## PART B – Equality Analysis Form

As a public authority we need to ensure that all our strategies, policies, service and functions, both current and proposed have given proper consideration to equality and diversity.

This form:

- Can be used to prompt discussions, ensure that due regard has been given and remove or minimise disadvantage for an individual or group with a protected characteristic
- Involves looking at what steps can be taken to advance and maximise equality as well as eliminate discrimination and negative consequences
- Should be completed before decisions are made, this will remove the need for remedial actions.

Note – An Initial Equality Screening Assessment (Part A) should be completed prior to this form.

When completing this form consider the Equality Act 2010 protected characteristics Age, Disability, Sex, Gender Reassignment, Race, Religion or Belief, Sexual Orientation, Civil Partnerships and Marriage, Pregnancy and Maternity and other socio-economic groups e.g. parents, single parents and guardians, carers, looked after children, unemployed and people on low incomes, ex-offenders, victims of domestic violence, homeless people etc. – see page 11 of Equality Screening and Analysis Guidance.

1. Title	
<b>Equality Analysis title:</b> <b>My Own Place: Expanding Supported Living for Autistic People and People with a Learning Disability</b>	
<b>Date of Equality Analysis (EA): 4<sup>th</sup> July 2022</b>	
<b>Directorate: Adult Care, Housing &amp; Public Health</b>	<b>Service area: Strategic Commissioning</b>
<b>Lead person</b> <b>Kay Nicholes, Strategic Commissioning Manager</b>	<b>Contact number:</b> 01709 334043
<b>Is this a:</b>	
<input type="checkbox"/> <b>Strategy / Policy</b>	<input checked="" type="checkbox"/> <b>Service / Function</b>
	<input type="checkbox"/> <b>Other</b>

<b>If other, please specify</b>		
<b>2. Names of those involved in the Equality Analysis (Should include minimum of three people) - see page 7 of Equality Screening and Analysis Guidance</b>		
<b>Name</b>	<b>Organisation</b>	<b>Role (e.g., service user, managers, service specialist)</b>
Chloe Jakes-Shawcroft	RMBC	Commissioning Officer
Kay Nicholes	RMBC	Strategic Commissioning Manager
Garry Parvin	RMBC	Head of Service

<b>3. What is already known? - see page 10 of Equality Screening and Analysis Guidance</b>
<b>Aim/Scope (who the Policy/Service affects and intended outcomes if known)</b>
<p><b>Aim/Scope</b></p> <p>The Cabinet and Commissioner’s Decision Making of 21 May 2018, approved the recommendations set out in the report ‘The Transformation of Services and Support for People with a Learning Disability. The report outlined the approach of moving away from the then existing building-based locations to alternative ways of delivering care and support in the local community.</p> <p>Following the approval of this report, the Council has developed the ‘My Front Door’ approach, to ensure that the services which an individual accesses are more person-centred and the individual has more role in shaping their support plan.</p> <p>Following the approach set out in May 2018, the Cabinet considered an update report on 19 October 2020. The report outlined commissioning intentions for services for people with a Learning Disability and/or Autism. These commissioning intentions will strengthen independence, choice and control for people within Rotherham, and support the My Front Door programme.</p> <p>Cabinet will be asked to consider a further report on 19 September 2022 concerning the intentions for the further development of Supported Living Opportunities in Rotherham.</p>
<b>What equality information is available? (Include any engagement undertaken)</b>
<p><b>Data regarding the Learning Disability cohort:</b> Data is available for 781 customers aged over 18 in the Learning Disability/Autism cohort accessing 1471 placements/services. Some customers access more than one service. Data is captured on the Adult Care LAS case management system. 206 of these customers live within a supported living setting.</p> <p><b>Age:</b> The age range of people within the cohort is 18 to 95 with the majority of customers, 90%, falling into the 20-69 age groups. The services are available to all adults who have an assessed need, regardless of their age.</p>

**Gender:** There are currently 59% males and 41% females accessing services. No other gender is recorded. All services are available to those who have an assessed need regardless of their Gender.

**Race:**

Rotherham's 18+ population is 93.04% White British (ref: Census 2011), in comparison, 94.32% of the Learning Disability cohort are from this ethnic group.

Customers from Black Minority Ethnic (BME) groups are slightly under-represented in this cohort. 5.68% of the cohort are from a BME background compared with 6.96% of the total population. This is an increase of 1.5% compared to the 4.18% from a BME group recorded in 2020 data.

The 'Asian-Pakistani' BME group has the highest number of customers - 21 (2.71% of the cohort).

This could indicate that the wider BME community are not fully engaging with Adult Care Services in general.

In speaking to Rotherham's South Asian Muslim Communities concerning accessing services for autistic people and people with learning disabilities in Rotherham. The following actions were identified:

- People who communicate in Urdu, Punjabi, Pakistani Pahari and Persian/Farsi enable the right support to be received at the right time
- Support from family members and personal assistants was highly valued
- Accurate assessments of need, prompt and regular interventions and partnership working between services and families were important

Work will be undertaken as part of the Council Equalities Impact Assessments (EIA) to develop accessible information, which is written in Urdu, Punjabi, Pakistani Pahari and Persian/Farsi as well as English

**Religion or Belief:** These services are available to all who have an assessed need regardless of their Religion or Belief.

The data is not routinely captured. Data gathered around this characteristic informed us that 516 (66%) did not declare a Religion/Belief, had no religion or the information was not captured.

Where a Religion/Belief was captured 32% identified as Christian and 1.66% identified as Muslim.

The remaining 0.26% was split across 2 other Religions/Beliefs.

**Marital Status:** These services are available to all who have an assessed need regardless of their Marital Status.



<p>Data gathered around marital status informed that 80.92% identify as Single, 1.66% identify as Married and 5% identify as either Divorced, Partnered or Widowed. This characteristic was not recorded for 12% of customers.</p> <p><b>Disability:</b> All people accessing the services identify with a disability, with a primary client group identified as Learning Disability and/or Autism.</p>	
<p><b>Are there any gaps in the information that you are aware of?</b>                  The services are available to all who have an assessed need regardless of the Protected Characteristics. However, it has been identified that data concerning Gender Reassignment, Pregnancy and Maternity and Sexual Orientation have not been regularly captured.</p>	
<p><b>What monitoring arrangements have you made to monitor the impact of the policy or service on communities/groups according to their protected characteristics?</b></p> <p>Equality information on protected characteristics is routinely collected as part of the referral and assessment process for individuals accessing the service and recorded on LAS, which is the adult social case management system. These processes also allow feedback to be provided by the cared-for person and unpaid carers to Adult Social Care staff on the quality of service provision they receive.</p> <p>People using the services and their unpaid Carers also have the option to make a formal complaint regarding the quality of the care or about issues with systems and processes aligned to it through the Council’s or the Provider’s complaints process.</p> <p>For more serious concerns Safeguarding and Whistle Blowing policies and procedures are in place and followed.</p> <p>The Care Quality Commission (CQC) also regulates Supported Living services.</p>	
<p><b>Engagement undertaken with customers. (date and group(s) consulted and key findings)</b></p>	<p>The development of the specification for the new services will involve a co-production exercise. This will involve current and potential future service users.</p>
<p><b>Engagement undertaken with staff (date and group(s) consulted and key findings)</b></p>	<p>As this proposal is in relation to externally commissioned services this will not directly impact on Council staff. Engagement will take place with providers, and existing providers will be aware of the process and timescales.</p>

**4. The Analysis - of the actual or likely effect of the Policy or Service (Identify by protected characteristics)**

**How does the Policy/Service meet the needs of different communities and groups?** (Protected characteristics of Age, Disability, Sex, Gender Reassignment, Race, Religion or Belief, Sexual Orientation, Civil Partnerships and Marriage, Pregnancy and Maternity) - see glossary on page 14 of the Equality Screening and Analysis Guidance)

The intersection of race and disability, two marginalised identities in society, can result in unwitting prejudice, ignorance, thoughtlessness and stereotyping leading to inappropriate care decisions being made. These experiences can create a distrust for services and professionals within BAME communities.

Evidence suggests that families who are perceived as “hard to reach” are not offered the same level of service and treatment that white British families are which consequently results in worse outcomes in health. For example, Black people with learning disabilities are less likely to be offered psychotherapy, more likely to be offered drugs, and more likely to be treated by coercion in inpatient settings, even after socioeconomic and diagnostic differences are considered. Furthermore, autistic people from the BAME community face bigger challenges in getting an autism diagnosis and education staff make incorrect assumptions about behaviour and language abilities. Across community services, institutional discrimination is present and there is a long way to go before they meet the challenges of our multicultural society

We will ensure that providers make their services available, and work in innovative ways to engage with customers who have additional needs. The providers will be expected to have a person-centred, outcome focussed ethos and practice.

Work will be undertaken as part of the Council Equalities Analysis Action Plan to develop accessible information, which is also written in Urdu, Bengali, Punjabi, Pakistani Pahari and Persian/Farsi as well as English.

**Does your Policy/Service present any problems or barriers to communities or Groups?**

We will ensure that providers who are working in the Borough, make their services available, and work in innovative ways to engage with customers who have additional needs. The providers will be expected to have a person-centred, outcome focussed ethos and practice, using the TLAP I and We statements to engender this.

In coproduction sessions with Rotherham’s South East Asian Muslim community reported that they had faced barriers to accessing services due to a lack of information about autism and also what services are available; with any available information always being in English and containing high levels of jargon.

Working with Rotherham’s South East Asian Muslim community has identified that easy-read written documents are welcomed, these documents must be also written in Urdu, Punjabi, Pakistani Pahari and Persian/Farsi as well as English

**Does the Service/Policy provide any positive impact/s including improvements or remove barriers?**

There will be a positive impact for all who access this type of service regardless of any of the protected characteristics. The proposed approach will ensure that the Council can continue to work with existing, good-quality, outcome-based providers. Together with expanding the choice of care and support providers available to support people to live more independently in Rotherham. The providers will be expected to have a person-centred, outcome focussed ethos and practice.

Opportunities to expand the accommodation available will also have a positive impact increasing choice into areas where people have expressed a desire to live.

The specifications for the care and support will be co-produced (supported by Speak-up which is a local independent advocacy group). This co-production process will offer an opportunity for engagement with a range of service users. This process will be a positive impact and enable service users to engage in the process.

**What effect will the Policy/Service have on community relations?**

Parents from Rotherham’s South East Asian Muslim community reported stigma in that they felt that there was little understanding or awareness of autism within the BAME community resulting in their concerns being dismissed or blamed for causing their child’s behaviour. Work will be completed with Rotherham’s voluntary sector to challenge this stigma.

Please list any **actions and targets** that need to be taken as a consequence of this assessment on the action plan below and ensure that they are added to your service plan for monitoring purposes – see page 12 of the Equality Screening and Analysis Guidance.

## **5. Summary of findings and Equality Analysis Action Plan**

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 - See page 11 of the Equality Screening and Analysis guidance

<b>Title of analysis: My Own Place: Expanding Supported Living for Autistic People and People with a Learning Disability</b>
<b>Directorate and service area: Adult Care, Housing &amp; Public Health, Strategic Commissioning</b>
<b>Lead Manager:</b>
<b>Summary of findings:</b>
<p>The Equality Analysis has been completed to ensure that people with disabilities and long-term conditions, namely Learning Disabilities and or Autism are not negatively impacted by any future plans regarding the expansion of supported living within Rotherham.</p> <p>The Equality Analysis found that the primary focus of the proposal will be to support people with Disabilities to ensure they are able to access appropriate supported accommodation in Rotherham. However, the process has identified that there are data gaps in terms of some of the Protected Characteristics including: Gender Reassignment, Pregnancy and Maternity and Sexual Orientation which have not been routinely and accurately captured.</p>

Action/Target	State Protected Characteristics as listed below	Target date (MM/YY)
Provider sustainability both in relation to current services and the impact on sustainability of provisions in future.	Primary focus on D & C A, S, GR, RE, RoB, SO, PM, CPM & O	<b>Ongoing to embed into commissioned solutions</b>
Providers joining the proposed flexible purchasing framework will be asked to develop easy read material written in Urdu, Punjabi, Pakistani Pahari and Persian/Farsi as well as English	A, D, S, GR, RE, RoB, SO, PM, CPM, C & O	<b>Ongoing to embed in to commissioned solutions</b>

Appendix 3

Parents from Rotherham's South East Asian Muslim community reported stigma in that they felt that there was little understanding or awareness of autism within the BAME community resulting in their concerns being dismissed or blamed for causing their child's behaviour. Work will be completed with Rotherham's voluntary sector to challenge this stigma.	A, D, S, GR, RE, RoB, SO, PM, CPM, C & O	<b>Ongoing to embed in to commissioned solutions</b>
The continued provision of choice in the Learning Disability and Autism market, ensuring that this continues to be as diverse as possible	A, D, S, GR, RE, RoB, SO, PM, CPM, C & O	<b>Ongoing to embed in to commissioned solutions</b>
Continuation of the person's preferred care and support option.	A, D, S, GR, RE, RoB, SO, PM, CPM, C & O	<b>Ongoing to embed in to commissioned solutions</b>
Commissioning Plan and Market Position Statement will enable commissioning priorities to be shared with Providers and ensures services meet needs of all groups.	A, D, S, GR, RE, RoB, SO, PM, CPM, C & O	<b>Ongoing</b>
Cost of Care – For the services provided to people with long term conditions and disabilities, namely Learning Disability and/or Autism the Commissioning Team are currently appraising a care cost calculator which, if approved, will be utilised to undertake this work with providers at the earliest opportunity and will be included as part of the assessment and review process for placements within these services moving forward.	A, D, S, GR, RE, RoB, SO, PM, CPM, C & O	<b>Ongoing to embed into commissioned solutions.</b>

**\*A = Age, D= Disability, S = Sex, GR Gender Reassignment, RE= Race/ Ethnicity, RoB= Religion or Belief, SO= Sexual Orientation, PM= Pregnancy/Maternity, CPM = Civil Partnership or Marriage. C= Carers, O= other groups**

## Appendix 3

6. Governance, ownership and approval		
Please state those that have approved the Equality Analysis. Approval should be obtained by the Director and approval sought from DLT and the relevant Cabinet Member.		
Name	Job title	Date
Nathan Atkinson	Assistant Director, Strategic Commissioning	13/07/22
Ian Spicer	Strategic Director, ACH & PH	
Cllr David Roche		

7. Publishing	
The Equality Analysis will act as evidence that due regard to equality and diversity has been given.	
If this Equality Analysis relates to a <b>Cabinet, key delegated officer decision, Council, other committee or a significant operational decision</b> a copy of the completed document should be attached as an appendix and published alongside the relevant report.	
A copy should also be sent to <a href="mailto:equality@rotherham.gov.uk">equality@rotherham.gov.uk</a> For record keeping purposes it will be kept on file and also published on the Council's Equality and Diversity Internet page.	
<b>Date Equality Analysis completed</b>	4/7/2022
<b>Report title and date</b>	
<b>Date report sent for publication</b>	
<b>Date Equality Analysis sent to Performance, Intelligence and Improvement <a href="mailto:equality@rotherham.gov.uk">equality@rotherham.gov.uk</a></b>	