

Equality Impact Assessment / Equality Analysis

(Updated Nov 2024)

Item name	Details
Title of service or policy	Commissioning
Name of directorate and service	Commissioning – Start Well
Name and role of officers completing the EIA	Ian Tomlinson
Date of assessment	26 th November 2024

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

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

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

Key questions	Answers / notes
<p>1.1 Briefly describe purpose of the service/policy e.g.</p> <ul style="list-style-type: none"> ● How the service/policy is delivered and by whom ● If responsibility for its implementation is shared with other departments or organisations ● Intended outcomes 	<p>The commissioning of placements for Children Looked After is managed by the Brokerage Team, which includes two dedicated Brokerage Officers and a Payments Officer.</p> <p>The primary objective is to secure suitable and tailored placements for every Child Looked After as part to Banes Sufficiency Duty.</p> <p>In terms of saving £500,000 from the children’s placements budget. This could have significant and far-reaching impacts for both the service and the children it supports.</p> <p>Financially, it could allow Banes to reallocate resources to other critical areas, such as early intervention services, fostering recruitment, or support for families to prevent children from entering care.</p> <p>Strategically, these savings could reduce reliance on high-cost placements, particularly out-of-area or unregulated provisions, promoting stability and better outcomes for children. However, achieving these savings requires a careful balance to ensure cost reductions do</p>

	<p>not compromise the quality, safety, or suitability of placements, which are essential for meeting the complex needs of Children Looked After.</p> <p>By focusing on value-driven commissioning and stronger collaboration with providers, these savings could enhance service efficiency while maintaining high standards of care.</p>
<p>1.2 Provide brief details of the scope of the policy or service being reviewed, for example:</p> <ul style="list-style-type: none"> ● Is it a new service/policy or review of an existing one? ● Is it a national requirement?). ● How much room for review is there? 	<p>The commissioning of placements for Children Looked After is overseen by the Brokerage Team, comprising two dedicated Brokerage Officers and a Payments Officer.</p> <p>The core aim is to ensure every Child Looked After has a suitable and tailored placement, fulfilling Bath and North East Somerset's (B&NES) Sufficiency Duty. This statutory duty requires B&NES to secure appropriate placements for all Children Looked After.</p> <p>To meet this obligation, B&NES participates in a regional Dynamic Purchasing System (DPS) in collaboration with South Gloucestershire, Gloucestershire, North Somerset, Bristol, Swindon, and Wiltshire. The DPS provides access to:</p> <ul style="list-style-type: none"> • Independent Fostering Agencies (IFAs) • Residential Children's Homes (RCHs) • 16+ Accommodation and Support • Parent and Baby Residential Units (P&BRUs) <p>By working within this regional consortium, B&NES benefits from standardised fees, aligning with neighbouring authorities. Ensuring we are paying the same fees as larger LA's. However, when the DPS cannot meet specific needs, spot purchasing is required, leading to annual fee negotiations with certain providers.</p>

	<p>Fee Structure</p> <p>The DPS includes fixed fee arrangements for IFAs and RCHs:</p> <ul style="list-style-type: none"> • Fees are fixed for the first two years, with a 2% uplift applied to new placements in years 2–4. • An additional 2% uplift is applied to new placements if a two-year contract extension is agreed. <p>For 16+ placements and P&BRUs, fee increases are negotiated annually, led by South Glos who lead for this market place.</p> <p>However, providers can request fee increases under “unforeseen circumstances” clauses, such as those related to inflation and rising energy costs. These pressures sometimes require negotiating fee adjustments outside the DPS terms.</p> <p>Legacy Placements</p> <p>Legacy placements, established under previous DPS arrangements, have also presented challenges. While fees were previously held, consultations with procurement and legal teams have necessitated transitioning some placements to providers’ current fee structures.</p> <p>As part of its legal obligations, B&NES must adhere to fees agreed upon through the DPS, ensuring compliance with procurement legislation and contractual terms.</p>
1.3 Do the aims of this policy link to or conflict with any other policies of the Council?	No

2. Consideration of available data, research and information

Key questions	Data, research and information that you can refer to
<p>2.1 What equalities training have staff received to enable them to understand the needs of our diverse community?</p>	<p>All staff have completed the equalities training via the Learning Pool. Social work qualifications also include elements of equalities training. Sari run bespoke training within B&NES.</p>
<p>2.2 What is the equalities profile of service users?</p>	<p>The equalities profile of Children Looked After in Bath and North East Somerset reflects national and regional trends. Key aspects include:</p> <ol style="list-style-type: none"> 1. Demographics: The majority of CLA in B&NES are white British, aligning with the overall population profile of the area. However, children from minority ethnic backgrounds are proportionally overrepresented, as seen across England. 2. Gender: There is a higher number of boys in care compared to girls, a trend consistent with national statistics. 3. Age Distribution: Most children enter care during their teenage years, although younger children are also represented. 4. Special Educational Needs (SEN): A significant proportion of CLA have special educational needs, many with Education, Health, and Care Plans (EHCPs). These needs often stem from earlier experiences of neglect, trauma, or abuse. 5. Health and Wellbeing: CLA in B&NES often face challenges related to physical and mental health, including higher rates of emotional and behavioural difficulties. Initiatives such as the Virtual School and the South West Sufficiency Project aim to address these challenges. <p>B&NES collaborates regionally through consortia to ensure sufficiency and equal access to care, addressing disparities in health, education, and placement stability for CLA while promoting a child-centered, equitable approach to their needs .</p>
<p>2.3 Are there any recent customer satisfaction surveys to refer to? What were the results? Are there</p>	<p>No</p>

any gaps? Or differences in experience/outcomes?	
2.4 What engagement or consultation has been undertaken as part of this EIA and with whom? What were the results?	N/A as above
2.5 If you are planning to undertake any consultation in the future regarding this service or policy, how will you include equalities considerations within this?	This will form part of the public consultation on council budgets

3. Assessment of impact: 'Equality analysis'

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

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

Key questions	Examples of what the service has done to promote equality	Examples of actual or potential negative or adverse impact and what steps have been or could be taken to address this
3.1 Issues relating to all groups and protected characteristics	The commissioning team promotes equality for groups with protected characteristics by ensuring services are inclusive, accessible, and responsive to diverse needs.	No known adverse impact based on this budget growth

	<p>This includes conducting Equality Impact Assessments, designing culturally appropriate and tailored services, and removing barriers to access.</p> <p>The team monitors outcomes to address disparities, supports providers to promote equality and inclusion, and is working towards a co production model with parent carers.</p> <p>By embedding equality at every stage of the commissioning process, the team ensures that children from all backgrounds receive high-quality, equitable support.</p>	
<p>3.2 Sex – identify the impact/potential impact of the policy on women and men.</p>	<p>In relation to sex, the children’s commissioning team promotes equality by ensuring that services are designed to meet the specific needs of both boys and girls while addressing any disparities in outcomes.</p> <p>This includes tailoring support to reflect gender-specific risks, such as safeguarding boys from criminal exploitation and girls from risks of exploitation or early parenthood.</p> <p>Services are commissioned to avoid reinforcing gender stereotypes, instead empowering children to thrive regardless of their sex.</p>	<p>No known adverse impact based on this budget growth</p>

	Regular data monitoring ensures that any differences in access or outcomes are identified and addressed, with feedback from children and young people helping shape gender-responsive service delivery, through the in-care council and the care experienced group.	
3.3 Pregnancy and maternity	<p>In relation to pregnancy and maternity, the children's commissioning team promotes equality by ensuring services support young people who are pregnant or parenting, particularly young mothers in care and face additional vulnerabilities.</p> <p>Services are designed to reduce stigma, ensure equitable access to resources, and provide safe accommodation where needed, such as parent and baby placements with foster carer or residential units.</p> <p>Regular monitoring ensures that pregnant and parenting young people receive the support necessary to achieve positive outcomes for themselves and their children.</p>	No known adverse impact based on this budget growth
3.4 Gender reassignment – identify the impact/potential impact of the policy on transgender people	In relation to gender reassignment, the children's commissioning team promotes equality by ensuring services are inclusive, supportive, and responsive to the needs of transgender and non-binary young people.	No known adverse impact based on this budget growth

	<p>The team works with providers to ensure policies are inclusive and monitors outcomes to identify and address disparities, fostering a safe and equitable experience for all young people.</p> <p>The team commission agencies such as: Off the Record who provide LGBTQ+ support services. SARI to provide training and practice reflective sessions. Individuals and families are supported to access SARI for LGBTQ+ related issues or incidents.</p>	
<p>3.5 Disability – identify the impact/potential impact of the policy on disabled people (ensure consideration of physical, sensory and mental health needs/differences)</p>	<p>In relation to disability, the children’s commissioning team promotes equality by ensuring that services are accessible, inclusive, and tailored to meet the diverse needs of disabled children and young people.</p> <p>This includes commissioning placements and support services equipped to address a range of physical, sensory, and learning disabilities, as well as complex health needs.</p> <p>There is ongoing close communication with the Parent Care Forum which advocates to ensure their voices shape the support provided.</p>	<p>No known adverse impact based on this budget growth</p>

	<p>In addition, there is are commissioned services for short breaks for disabled children, residential and in the community.</p> <p>Parents/carers have access to free independent support and advice through SENDIAS: https://livewell.bathnes.gov.uk/special-educational-need-or-disability-send/sendias-bathnes</p>	
<p>3.6 Age – identify the impact/potential impact of the policy on different age groups</p>	<p>In relation to age, the children’s commissioning team promotes equality by ensuring that services are tailored to meet the developmental and emotional needs of children and young people across all age groups.</p> <p>This involves commissioning age-appropriate placements and support, such as fostering for younger children, therapeutic residential care for adolescents, and transition services for care leavers.</p> <p>Engaging with children and young people of different ages ensures their specific needs and voices inform service design and delivery.</p>	<p>No known adverse impact based on this budget growth</p>

<p>3.7 Race – identify the impact/potential impact on across different ethnic groups</p>	<p>In relation to race, the children’s commissioning team promotes equality by ensuring services are culturally sensitive and address the specific needs of children and young people from all racial and ethnic backgrounds.</p> <p>This includes commissioning placements and support services that respect and reflect the cultural, linguistic, and religious identities of children. The team works to address disparities by monitoring outcomes for children from minority ethnic backgrounds and ensuring equal access to high-quality services.</p> <p>Collaboration with culturally competent providers and community organisations ensures children feel valued and supported in their heritage, while also combating discrimination or bias within service delivery.</p> <p>The team commission SARI to provide training and practice reflective sessions for staff. Individuals and families are supported to access SARI for Race related issues or incidents.</p> <p>B&NES Traveller families can be signposted to the following services: Traveller Education</p>	<p>No known adverse impact based on this budget growth</p>
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	<p>Health and wellbeing Housing Dedicated Outreach Officer</p> <p>A regular multi-agency meeting ensures that all professionals work together for a coordinated approach for the Traveller Community.</p>	
<p>3.8 Sexual orientation – identify the impact/potential impact of the policy on lesbian, gay, bisexual, heterosexual, questioning people</p>	<p>In relation to sexual orientation, the children’s commissioning team promotes equality by ensuring services are inclusive and affirming for children and young people of all sexual orientations.</p> <p>Services are designed to address challenges such as discrimination, stigma, or mental health concerns that may disproportionately affect LGBTQ+ children.</p> <p>The team commission agencies such as: Off the Record who provide LGBTQ+ support services. SARI to provide training and practice reflective sessions. Individuals and families are supported to access SARI for LGBTQ+ related issues or incidents.</p>	<p>No known adverse impact based on this budget growth</p>
<p>3.9 Marriage and civil partnership – does the policy/strategy treat married and civil partnered people equally?</p>	<p>In relation to marriage and civil partnerships, the children’s commissioning team promotes equality by ensuring that services are inclusive and sensitive to the diverse family structures and legal partnerships that children and young people may encounter.</p>	<p>No known adverse impact based on this budget growth</p>

	<p>This includes recognising the role of married or civilly partnered carers, such as foster carers or adoptive parents, in providing stable and nurturing environments.</p> <p>The team ensures that commissioned services do not discriminate based on marital or partnership status and that all families are treated equitably.</p>	
<p>3.10 Religion/belief – identify the impact/potential impact of the policy on people of different religious/faith groups and also upon those with no religion.</p>		<p>No known adverse impact based on this budget growth</p>
<p>3.11 Socio-economically disadvantaged* – identify the impact on people who are disadvantaged due to factors like family background, educational attainment, neighbourhood, employment status can influence life chances (this is not a legal requirement, but is a local priority).</p>		<p>No known adverse impact based on this budget growth</p>
<p>3.12 Rural communities* identify the impact / potential impact on people living in rural communities</p>	<p>In relation to rural communities, the children’s commissioning team promotes equality by ensuring that services are accessible and responsive to the unique challenges faced by children and young people living in rural areas.</p> <p>This includes addressing issues such as geographical isolation, limited local resources, and travel barriers to</p>	<p>No known adverse impact based on this budget growth</p>

	<p>accessing services, such as education, healthcare, and social care support.</p> <p>Monitoring and addressing the impact of rural isolation on well-being and service access is key to ensuring equality for children from these communities.</p> <p>For some children placed with foster carers or in a residential home a rural environment can be seen as a positive in terms of keeping them safe.</p>	
<p>3.13 Armed Forces Community ** serving members; reservists; veterans and their families, including the bereaved. Public services are required by law to pay due regard to the Armed Forces Community when developing policy, procedures and making decisions, particularly in the areas of public housing, education and healthcare (to remove disadvantage and consider special provision).</p>	<p>Learning from colleagues working across B&NES and Wiltshire is drawn upon when required.</p>	<p>No known adverse impact based on this budget growth</p>
<p>3.14 Care Experienced *** This working definition is currently under review and therefore subject to change: In B&NES, you are 'care-experienced' if you spent any time in your childhood in Local Authority care, living away from your parent(s) for example, you were</p>	<p>In relation to care experience, the children's commissioning team promotes equality by ensuring that the unique needs of care-experienced young people are fully addressed.</p> <p>This includes providing tailored support such as stable, supportive placements.</p>	<p>No known adverse impact based on this budget growth</p>

<p>adopted, lived in residential, foster care, kinship care, or a special guardianship arrangement.</p>	<p>The commissioning team works to ensure that care-experienced young people are not disadvantaged by their background, offering services that promote well-being, educational success, and opportunities for personal development. For example the team is currently working with a local provider who is funded by DFE to provide a Staying Close service which provides additional funding for care leavers.</p> <p>By advocating for care-experienced children, the team works to break down barriers and provide equitable opportunities for all.</p> <p>In addition the wider commissioning team has included support to Care Leavers as the social value question.</p>	
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*There is no requirement within the public sector duty of the Equality Act to consider groups who may be disadvantaged due to socio economic status, or because of living in a rural area. However, these are significant issues within B&NES and have therefore been included here.

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

***The Equality Act does not cover care experienced people. B&NES adopted this group as a protected characteristic in March 2024 alongside over 80 other Local Authorities. Although we have data for care leavers and children/young people who are currently in the care of B&NES we do not have wider data on disadvantage experienced through being in care.

4. Bath and North East Somerset Council Equality Impact Assessment Improvement Plan

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

Issues identified	Actions required	Progress milestones	Officer responsible	By when
Decisions concerning children's placements and packages of care.	Commissioning representative to attend all Care and Resource Panel's and robustly challenging assessment, care planning and sourcing activity to meet eligible care needs in a person-centred way and to deliver better value.	Quarterly reporting through spreadsheet detailing challenges of decisions and projected cost savings.	Alexandra Hughes	Ongoing
Negotiating fee uplift requests – On spot purchase purchases and through Dynamic Purchasing Systems.	Commissioning Manager in consultation with senior management and finance	Annual updates with our consortia partners.	Alexandra Hughes	As required.
Potential for losing providers due to not agreeing uplifts.	Engagement with market to engage providers in meaningful negotiations regarding uplifting fees.	Annual updates with our consortia partners.	Alexandra Hughes	Annually

5. Sign off and publishing

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

Signed off by: Mary Kearney-Knowles

(Divisional Director or nominated senior officer)

Date: 5/12/2024