

## **EQUALITY IMPACT ASSESSMENT TOOL**

The council has a statutory duty to consider the impact of its decisions on age, disability, gender reassignment, pregnancy & maternity, race, religion or belief, sex (gender) and sexual orientation.

The Council also has a duty to foster good relations between different groups of people and to promote equality of opportunity.

Completing an EIA is the simplest way to demonstrate that the Council has considered the equality impacts of its decisions and it reduces the risk of legal challenge. EIAs should be carried out at the earliest stages of policy development or a service review, and then updated as the policy or review develops. EIAs must be undertaken when it is possible for the findings to inform the final decision. Keep all versions of your EIA. An EIA should be finalised once a final decision is taken.

#### When you should undertake an EIA:

- You are making changes that will affect front-line services
- You are reducing the budget of a service, which will affect front-line services
- You are changing the way services are funded and this may impact the quality of the service and who can access it
- You are making a decision that could have a different impact on different groups of people
- You are making staff redundant or changing their roles (particularly if it impacts on frontline services).
- EIAs also need to be undertaken on how a policy is implemented even if it has been developed by central government (for example cuts to grant funding).

#### Who should undertake the EIA:

The person who is making the decision or advising the decision-maker

Guidance and tools for completing EIAs are available on the WIRE:

https://officesharedservice.sharepoint.com/sites/intranet/wcc-comms/Pages/Equality-Impact-Assessments-.aspx

An EIA e-learning module is available for all Westminster staff: www.learningpool.com/westminster/course/view.php?id=159

When you have completed an EIA, please send the final copy to Equalities@westminster.gov.uk

It is the responsibility of the service to complete an EIA to the required standard and the quality and completeness of EIAs will be monitored by EMT.

All EIAs for proposed changes to levels of service arising from budget proposals must be completed by <u>2 September 2016</u>.

#### Title

#### 8.4D: Service Proposals for Westminster City Council Youth

#### What are you analysing?

- What is the purpose of the policy/project/activity/strategy?
- In what context will it operate?
- Who is it intended to benefit?
- What results are intended?
- Why is it needed?

#### What is the purpose of the proposal?

The Council is targeting available resources at those who need support most, in line with the Early Help Strategy and to meet statutory duties.

The proposal is to cease council funding for youth services from September 2016. Current contracts with commissioned youth providers expire in March 2016 and these have been extended until September 2016. This has allowed providers time to plan and develop sustainable service models that reflect the current funding environment.

The youth offer in Westminster is delivered by a large number of organisations. Of these, thirteen are directly funded through the Children's Services Commissioning Directorate. The funded providers raise considerable resources from other funding streams and their reliance on council funding varies considerably. The providers are already working on the development of sustainable business models that are not reliant on council funding in future.

Council officers are working with a range of funders, providers, and partner agencies to develop the future offer for young people. This will be achieved by setting up a Young Westminster Foundation, a new charitable body that will be well placed to maximise resources for the sector. The Foundation has the support of a number of key local charities and will have good links to corporate donors.

A charitable foundation will be able to take advantage of the unique opportunities presented in Westminster and its location within the heart of the biggest economy in the United Kingdom. It will develop the capacity of the sector providers and encourage a partnership approach between providers, funders and potential donors. It will support the sector to develop a service offer that will be more likely to result in a sustainable, strong and viable offer for young people.

Whilst there is no need for the charitable foundation to be Council-led, the Council will be a committed sponsor of the charity, facilitating its establishment and sitting on the board of trustees. Given the independent nature of a charitable foundation it will set its own criteria and priorities in partnership with funding bodies, and is likely to support both universal open access facilities and more targeted work. Targeted support for young people with higher levels of need will be supported, and in some cases delivered, by the council Early Help locality teams and other statutory bodies.

The establishment of the Foundation model will take a minimum of 10 months and there is likely to be a gap between contracts for existing providers ending and a new 'foundation' model being in place with significant levels of funding secured. The Foundation will support the wider youth offer but is

unlikely to be able to sustain many of the existing funded services. Providers will need to seek funding streams and the Foundation will help to facilitate this and also secure funding on behalf of members.

Existing commissioned providers will need to adapt quickly to the new funding model and a significant number of existing services may be reduced as a consequence. It is likely that some youth providers will struggle to be sustainable, although others are in a strong position to secure alternative funding to develop a revised model.

Two clubs currently provide young people's services which contribute to meeting the council's statutory duties for young people with Special Educational Needs and Disabilities (SEND). The council has confirmed continuing to fund the provision for one of these until March 2017 and specialist services for these young people will continue to be supported through alternative means.

#### In what context will it operate?

The Early Help Strategy 2014 – 2018 sets out the priority outcomes that Westminster is focused upon achieving with its children and families.

The Strategy establishes the framework through which services will be developed to deliver targeted provision. One of the Strategy's key objectives is to 'revise our service model of investment in universal services together with our key partners in line with our priority outcomes, in particular in respect of Play, Children's Centres and Youth Services.'

#### Who is intended to benefit and how?

Existing contracts target provision for young people aged 11-19. They are likely to be young people living in areas of deprivation and needing additional support.

Existing services support hard to reach young people to access youth clubs, sports, and arts provision, and more specialist activities for young people with additional needs.

Providers also deliver educational and employment opportunities and tackle issues such as youth violence, healthy lifestyles, and building self-confidence.

#### What results are intended?

The establishment of the foundation is intended to help create a sustainable offer for youth service across the borough that is less reliant on council funding. Through building strong links with the corporate sector, partners in the business sector and being aware of funding opportunities it is anticipated that the foundation will secure and allocate funding for youth services.

#### Why is it needed?

To deliver savings in line with the council's budget setting process. The strategy is to create a model that will secure alternative funding streams for universal and targeted services for young people in Westminster.

Details of the lead person completing the screening/EIA

(i) Full Name: William Parsons

(ii) Position: Commissioning & Transformation Lead

(iii) Unit: Children's Services Commissioning

(iii) Contact Details: wparsons@westminster.gov.uk 0207 641 2526

#### Date sent to <a href="mailto:Equalities@westminster.gov.uk">Equalities@westminster.gov.uk</a>

16<sup>th</sup> September 2016

### Version number and date of update

The decision not to re-commission youth services and establish the YWF was approved on 15.06.2016 Version 1-02.09.16

# SECTION 1: Initial screening: Do you need to complete an Equality Impact Assessment (EIA)?

Not all proposals will require an EIA, this initial screening will help you decide if your project or policy requires a full EIA by looking at the potential impact on any equality groups.

Does the project, policy or				
impact on any of the follow	ving groups?	' If so, is the im	ipact positive (	or negative?
	<b>N</b> I	<b>D</b>	AlI'-	N
	None	Positive	Negative	Not sure
Disabled people				
Particular ethnic groups				
Men or women (include			$\boxtimes$	
impacts due to pregnancy/				
maternity)	<u> </u>			
People or particular sexual				
orientation/s				
People who are proposing to				
undergo, are undergoing or				
have undergone a process or				
part of a process of gender				
reassignment				
People on low incomes				
People in particular age				
groups				
Groups with particular faiths				
and beliefs				
Are there any other groups	No			
that you think may be				
affected negatively or				
positively by this project,				
policy or proposal?				
If the answer is "negati	ve" or "uncl	ear" consider (	doing a full EIA	1
What do you think that the	overall NEC	SATIVE impact	on groups and	
communities will be?				

	None/ Minimal	Significant
	None or minimal impact would be where	Significant impact would be where there is
	there is no negative impact identified, or	an impact is identified that has substantial
	where there will be no change to the	impact on any groups.
	services for any groups.	
	If the answer is "significant" c	onsider doing a full EIA
1.3	Using the screening information in quest carried out on the project, policy or pro	
	Yes ⊠ No □	
1.4	How have you come to this decision?	
	variety of trusts, charities, agencies such as the	Vestminster that attract resources from a wide Big Lottery, and public bodies. Many providers hers are more reliant on council funding for their
	It is apparent that there are considerable opposervice offer to secure new funding opportunit funding sources that are under-utilised and by foundation there is scope to attract considerable	ies. Within Westminster there is a range of raising the capacity of providers through the
	Following the Comprehensive Spending Review significant reductions in spending on non-statuable to declare a balanced budget.	
	The decision to focus council spending on statu higher levels of need has resulted in the propo services from October 2016.	utory and targeted services for young people with sed reduction in funding for universal youth
		nd the City Bridge Trust have recently worked eople Foundations' in Barnet, Brent, and Harrow. 's services from alternative sources is significant, nent of a Young Westminster Foundation will

# **EQUALITY IMPACT ASSESSMENT** SECTION 2: BUILDING AN EVIDENCE BASE

## 3.1 Build up a picture of who uses/will use your service or facility and identify who are likely to be impacted by the proposal

- If you do not formally collect data about a particular group then use the results of local surveys or consultations, census data, national trends or anecdotal evidence (indicate where this is the case). Please attempt to complete all boxes.
- A baseline of data is available here

How many people use the	North West 701
service currently? What is this as	North East 845
a % of Westminster's	South 280
population?	
Age	As above and based on no's of young people aged 11-19
Disability	North West 52
Number of disabled children and young	North East 72
people 11-24 years old	South 40
Gender	North West Male 64% Female 36%
	North East Male 65% Female 35%
	South Male 75% Female 25%
Race	North West 88%
BME (Black, Minority & Ethnic Groups)	North East 87%
Percentages based on particular ethnic	South 79%
groups  Rolligion or holiof	No data
Religion or belief	INO Udta
Sexual orientation	No data

**2.2** Are there any equality groups that are overrepresented in the monitoring information relative to their size of the population? If so, this could indicate that the proposal may have a disproportionate impact on this group even if it is a universal service. Information about Westminster's population is on the Equalities page on the WIRE.

The table above shows number of young people currently accessing youth services in the age category of 11 to 19 and up to 24 for young people with a disability. There is an overrepresentation across all three geographical splits of these changes affecting particular ethnic groups.

2.3 Are there any equality groups that are underrepresented in the monitoring information relative to their size of the population? If so, this could indicate that the service may not be accessible to all groups or there may be some form of direct or indirect discrimination occurring.

Based on the data available there are no equality groups that are underrepresented relative to the size of the population.

#### **SECTION 3: ASSESSING THE IMPACT**

In order to be able to identify ways to mitigate any potential impact it is essential that we know what those potential impacts might be.

#### 3.1 Consultation Information

This section should record the consultation activity undertaken in relation to this project, policy or proposal

Consultation events relating to these proposals finished on the 31<sup>st</sup> January 2016 and used an online survey to gauge opinion. Commissioners also attended a meeting of the Westminster youth council to discuss proposals.

The following consultation activity was undertaken in January 2015 to inform a service commissioning strategy.

#### Survey

An online survey of young people's views on the key issues affecting them and how and where they preferred to receive information and support was held in December 2014 and January 2015. 28 young people responded. 11 young people with learning difficulties and disabilities completed an adapted version of the survey. When asked about the relative importance of different places in their community, 82% said that youth clubs or projects were most important. The survey then focused on the issues which young people most wanted support with, under the headings staying safe; school, work or college; relationships; health and wellbeing. Youth clubs and projects were cited as the preferred location at which young people would like to receive support for a number of particular issues. A summary report of the findings of the survey is available.

#### Young People's focus groups - January 2015

Focus groups of young people were facilitated in youth clubs across the borough. There were a total of 10 different sessions involving 70 young people. They provided views on activities they enjoyed, advice and support they needed and how they preferred to receive this. Focus groups were also held with young people with disabilities. A detailed summary of all youth provision engagement activity is available.

#### Meetings with service providers – January 2015

These took place in each locality and were attended by 30 people in total:

North East Locality: 5 participants South Locality: 13 participants North East: 12 participants

Key themes for discussion included Flexible models; Targeting; Outcomes for young people; Working with partners; Quality of service.

A consistent and clear message from the locality meetings involving stakeholders was that the service should be based on and be responsive to young people's needs. There was a feeling that the age at which young people can use youth services might be lowered while it was felt that support was needed for older young people to move on to other services when they reached 19.

It was raised that many young people often will not want to travel far to provision for reasons relating to safety and cost. There was overwhelming agreement that youth services should maintain a balance between universal and targeted provision while young people should not 'feel' like they are being targeted. Budgets should be divided between universal and targeted provision with commissioned providers sharing resources better and communicating more effectively with locality teams and a wide network of other services and providers.

There was agreement that there should be an agreed and consistent method for monitoring and evaluating outcomes although outcomes monitoring should also be proportionate to the resource available i.e. level of funding. Quality marks were seen as positive with quality also ensured through contract management and better evidencing of impact. Participants felt that longer contracts (3 years minimum) would enable development of longer term strategies and therefore better quality and sustainability of delivery.

There was a very strong feeling across the workshops that youth services should not become part of locality Early Help teams and also that they should also remain separate from schools. The value and different dynamic of youth work should be recognised and developed.

### 3.2 What might the potential impact on individuals or groups be?

Consider disability, race, gender, sexual orientation, transgender, age, faith or belief and those on low incomes and other excluded individuals or groups

#### Particular age groups

Services are funded for young people aged 11-19, young people attending youth services will be negatively impacted by a reduction in service.

#### Young people with a learning difficulty and/or disability (LDD)

Young people from this group are overrepresented in the monitoring information when compared to the borough population. There are however differences in the definition of disability and recording methods which should be borne in mind.

Youth clubs record learning difficulty and/or disability and is self-reported i.e. the young person indicates whether or not they consider themselves to have a LDD. Overall164 young people with a LDD attended a youth club during 2014-15, representing approximately 10% of all young

people attending youth clubs. Proportions vary across providers with 100% of young people attending one of the two specialist disability providers having a LDD. In addition proportions of young people with LDD were higher than 10% at five other youth clubs.

Approx 350 children and young people are known to the borough's Children with Disabilities Team or are receiving short break services. This cohort represents children and young people with a high level of need and is approximately 2% of the borough's children and young people population. The actual borough population figure for young people with a LDD is likely to be higher.

The two clubs currently providing specialist youth club provision for disabled young people and are at risk. These clubs also contribute towards the council's statutory duties for SEND young people through the provision of short breaks/respite, however, one has funding confirmed until the end of the current financial year.

#### Young People from a Black or Minority Ethnic (BME) background

Overall, the majority (87%) of young people attending borough funded youth clubs are from a BME background and are over represented in the monitoring information compared to the borough BME population (38%).

The proportion of young people from a BME background varies from provider to provider, between 68% and 97%.

Young people are also overrepresented in the monitoring information in the wards with the highest proportions of young people from BME backgrounds; Church St 58%, Harrow Rd 58% and Queens Park 56%.

If available services reduce or close young people from a BME background would be negatively impacted.

Young men from the Bangladeshi community would be negatively impacted in the Church Street area if the Marylebone Bangladeshi Society (MBS) has to reduce or stop providing services.

Other clubs that work predominately with young people from BME backgrounds are the Avenues Youth Club, Stowe Youth Club, Amberley Youth Club and Fourth Feathers Youth Club. Young people attending these clubs would be negatively impacted by any reduction in services.

#### Gender

Compared to the borough population of 52% young males are over represented in the monitoring information, 69% of the overall youth club cohort are male. The proportion of young men attending differs across youth clubs with young men making up over 70% of attendees at seven youth clubs.

Girls and young women make up 31% of attendances at youth provision and are underrepresented in the monitoring information.

Young men attending MBS and targeted projects provided by Working with Men would also be

negatively impacted by any reduction in service.

#### Deprivation

Overall, 62% of young people attending youth clubs live in a 20% most deprived Income Deprivation Affecting Children Index (IDACI) Lower Super-Output Areas, compared to the borough figure of 37%, young people are therefore considerably over represented in the monitoring information. Particularly so at youth clubs located on housing estates where the figure rises to above 60% at six clubs.

Approximately 1,100 young people attending council funded youth clubs live in the areas of highest deprivation in Westminster. These young people would be negatively impacted by a reduction in service.

#### Young people with particular faiths and beliefs

Faith and belief data is not routinely collected at youth services and as such the number of young people of particular faiths and beliefs that are over represented in youth club attendance is unknown.

However, one provider, Marylebone Bangladesh Society, predominately works with young Muslim men. In this case young people from this particularly faith would be over represented compared to the overall borough population of 18% and therefore negatively impacted by the proposals.

#### Young people of particular sexual orientations

Youth services do not collect data for people of particular sexual orientations and there are no specialist providers commissioned, therefore it is assumed that this equality group are not over represented compared to the borough population. No impact anticipated.

#### **Teenage parents**

There are only two teenage parents recorded as attending a youth club and are therefore not over represented in the monitoring information. No impact anticipated.

#### **SECTION 4: REDUCING & MITIGATING IMPACT**

As a result of what you have learned, what can you do to minimise the impact of the proposed changes on equality groups and other excluded / vulnerable groups, as outlined above?

4.1	Where you have identified an	impact, what can be done to reduce or mitigate		
	the impact? (Remember to think about the Council as a whole, another service area may already be			
	providing services which can help to deal with any negative impact).			
	•	place to remove or reduce your identified impact(s). Record have considered all options. Please note if no mitigating		
	Column A – Issues or barriers,	Column B – what changes can be made to remove or		
	things to take into account	reduce barriers or negative impacts (Remember to think about the Council as a whole, another service area may already be providing services which can help to deal with any negative impact).		
	Impact 1: Impact on disabled	Children's Services officers have identified this as a key		
	young people	issue for the strategic review of services for young		
		people with SEND. This statutory provision will continue		
		to be made and alternative funding and services will be		
	Impact 2: Impact on young	sought to support these young people.  This response addresses impact areas 1-6		
	Impact 2: Impact on young people aged 11-19	This response addresses impact areas 1-0		
	Impact 3: Impact on young people from a BME background	In the first instance, by working in close partnership with the voluntary sector providers, officers will seek to mitigate service closures and provide advice on other funding streams. There is likely to be a reduction in some existing services but most should remain open for the remainder of the financial year.		
	Impact 4: Impact on young men	Termaniae: or the initiation, years		
	Impact 5: Impact on young people living in areas of deprivation	Over time, the Young Westminster Foundation will mitigate against any further impact by providing and securing alternative funding for services. The Foundation will have equality of opportunity at its core which will inform all funding decisions.		
	Impact 6: Impact on young people from particular faiths and beliefs	The new charitable foundation will build the capacity of the sector to secure alternative funding for the youth offer. Providers will need to respond to the expectations of funders and the council will only be one of the sponsors. The foundation model is designed to raise the capacity of providers, share and enhance resources, attract new streams of funding from a variety of sources, and develop a more responsive and collaborative youth offer that involves a wide range of stakeholders.		
		There will, however, be a gap between council funding		

		ending and the foundation being established and developed to the point that it is able to secure resources to sustain services. The length of this gap will be kept to a minimum, but could be several months.  The level of the universal youth offer for young people will be dependent on the ability of the voluntary sector to develop and sustain provision.  The Early Help service will seek to support the needs of young people through the effective provision of services for young people with additional needs. This will include health services, key worker support, links to employment services, and family support. Much of this support will be targeted at the equality groups identified in this assessment.  There is likely to be a short-term reduction in the level of services for young people and this will impact on the identified groups.	
4.2	nat you have considere are you taking?	ed the potential or actual effect on equality, what	
	4 51		
	No major change     (no impacts     identified)	Your analysis demonstrates that the policy is robust and the evidence shows no potential for discrimination and you have taken all appropriate steps to advance equality & foster good relations between groups.	
	2. Adjust the policy	You will take steps to remove barriers or to better advance	
•		equality.  You will adopt your proposal, despite any adverse effect provided you are satisfied that it does not unlawfully discriminate and it is justified.	
	3. Continue the policy (impacts identified)	You will adopt your proposal, despite any adverse effect	
	(impacts identified)  4. Stop and remove	You will adopt your proposal, despite any adverse effect provided you are satisfied that it does not unlawfully discriminate and it is justified.  There are adverse effects that are not justified and cannot	
	(impacts identified)	You will adopt your proposal, despite any adverse effect provided you are satisfied that it does not unlawfully discriminate and it is justified.	
4.3	(impacts identified)  4. Stop and remove	You will adopt your proposal, despite any adverse effect provided you are satisfied that it does not unlawfully discriminate and it is justified.  There are adverse effects that are not justified and cannot be mitigated. The policy is unlawfully discriminating.	

#### **SECTION 5: ACTION PLAN**

This section is for actions related any of the 9 protected characteristic: Age, Disability, Gender, Gender reassignment; Pregnancy & maternity, Race, Sexual Orientation or Religion/Belief

5.1 Complete the action plan if you need to reduce or remove the negative impacts you have identified, take steps to foster good relations or fill data gaps.

Please include the action required by your team/unit, groups affected, the intended outcome of your action, resources needed, a lead person responsible for undertaking the action (inc. their department and contact details), the completion date for the action, and the relevant RAG rating: R(ed) – action not initiated, A(mber) – action initiated and in progress, G(reen) – action complete.

NB. Add any additional rows, if required.

Action Required	Equality Groups Targeted	Intended outcome	Resources Needed	Name of Lead, Unit & Contact Details	Completion Date (DD/MM/YY)	RAG
Continue statutory provision for young people with SEND	Disabled young people	Positive activities Health and Well-being Employability Personal Development	Solution to emerge from the SEN and Children With Disabilities strategic reviews.  Spot purchase funding for disabled young people.	Lesley Hill, Children's Services Commissioning. Mandy Lawson, Children with disabilities	31/3/2016	
Support providers to develop sustainable business models	All	A strong sustainable future youth offer which meets the needs of young people.	Regular meetings with providers. Capacity	William Parsons Children's Commissioning	31/10/2016	

### EIA tool last updated 2 August 2016

Ensure Young Westminster Foundation model targets low income	Low income/ deprivation	Provide support and training to existing providers.  Retain services which are targeted at low income young people and their	building support.  Officer support for the creation	William Parsons Children's Commissioning	31/10/2016	
areas and key equalities groups		families.  Council is a co-sponsor of the proposed Young Westminster Foundation.	of the foundation	Commissioning		
Engage new funders, charities, trusts, CiL/Section 106, corporate CSR budgets, foundations, and key agencies in the foundation to maximise investment in young people's services.	All	Engagement with a wide variety of potential sponsors.  Resource mapping	Officer support Commitment of key stakeholders	William Parsons Children's Commissioning	31/10/2016	

THIS SECTION TO BE COMPLETED BY THE RELEVANT SERVICE MANAGER
SIGNATURE:
FULL NAME:
UNIT:
EMAIL & TELEPHONE EXT:
DATE (DD/MM/YYYY):

#### **WHAT NEXT?**

It is the responsibility of the service to complete an EIA to the required standard and the quality and completeness of EIAs will be monitored by EMT.

All EIAs for proposed changes to levels of service arising from budget proposals must be completed by <u>2 September 2016</u>.

All completed EIAs should be sent to: <a href="mailto:Equalities@westminster.gov.uk">Equalities@westminster.gov.uk</a>