

## **Equality Impact Assessment (EIA) Report**

For further information on undertaking and completing an Equality Impact Assessment, please see the [guidance](#).

<b>Name of policy/ procedure/ function/ service being assessed:</b>	Leicester City STAR Gypsy and Traveller Short Term Service
<b>Department and Section:</b>	Adults and Communities, Compliance (Non-Regulated)
<b>Name of lead officer and others completing this assessment:</b>	Chandni Motivaras
<b>Contact telephone numbers:</b>	0116 3057450
<b>Date EIA assessment completed:</b>	20/03/2014

### **Step 1: Defining the policy/ procedure/ function/ service**

Using the information gathered within the Equality Questionnaire, you should begin this full EIA by defining and outlining its scope. The EIA should consider the impact or likely impact of the policy in relation to all areas of equality, diversity and human rights, as outlined in the Equality, Diversity and Human Rights Strategy of Leicestershire County Council.

<b>What are the main aims, purpose and objectives of the policy/ procedure/ function/ service? How will they be achieved?</b>
<p>To review the termination of contract (as notified by the provider, Leicester City Council STAR) for the Gypsy and Traveller Short Term Floating Support Service.</p> <p>To highlight the potential impacts for the LCC and the Gypsy and Traveller client group as a result of the termination of contract as of 31<sup>st</sup> March 2014, and at the same time mitigate against any impacts as part of wider Leicestershire County Council and partner provision.</p>
<b>What are the main activities relating to this policy/ procedure/ function/ service and distinguish who is likely to benefit from these activities.</b>
<p>Leicester City Council STAR announced the decision to terminate the contract as a result of a review on the capacity to deliver the contract due to the financial climate and in part prompted by the contract negotiation discussions with LCC to consider proposals on how savings of 33% could be achieved from the current contract.</p> <p>The Compliance (Non-Regulated) Team is working with Strategic Planning and Commissioning and Market Development to identify options and mitigation against any impacts the Gypsy and Travellers community as part of wider Leicestershire County Council and partner provision current in place for the Gypsy and Travellers community.</p> <p>There are currently no identified key benefits to LCC from the termination of this contract.</p>
<b>What outcomes are expected?</b>
<p>In response to the termination of the current contract by Leicester City Council STAR, discussions have begun to consider whether there are any alternatives to current service provision that may be used to mitigate against the gap in service provision. One potential alternative, yet to be discussed and explored fully, is to negotiate with the Multi Agency Traveller Unit (MATU) an arrangement and some funding to pick up the workload and offer some support, along with utilising current services and support provided by the Travellers Health Service in terms of signposting to mainstream services if appropriate. Funding for any alternative would come from the money set aside for the contract which had been extended up</p>

to a maximum of 30<sup>th</sup> September 2015.

## Step 2: Potential Impact

Use the table below to specify if any service users or staff who identify with any of the 'protected characteristics' below will be affected by the policy/ procedure/ service you are proposing (indicate all that apply) and describe why and what barriers these individuals or groups may face.

Who is affected and what barriers may these individuals or groups face?				
Age	A breakdown by age of the client record data submitted as part of contract monitoring shows:			
	Age range	2012-13 – Q1-4	2013-14 – Q1-3	Total across all quarters
	Under 18	0	0	0
	18-25	3	1	4
	26-44	10	6	16
	45-54	1	2	3
	55-74	4	2	6
	75+	1	0	1
	Based on the above data, the majority of clients accessing the service were aged between 26-54. There was a minority of clients who were under 25 (i.e. 4), and above 55 (i.e. 7).			
	Older members of the Gypsy and Travellers community may find accessing support which is delivered through this service difficult. There would be an affect on older Gypsy and Traveller people in the event of MATU and the Travellers Health Service not being able to provide relevant support or signposting to mainstream services.			
Disability	A breakdown by client group in relation to disability of the client record data submitted as part of contract monitoring shows:			
	Type of secondary client group	2012-13 – Q1-4	2013-14 – Q1-3	Total across all quarters (out of 30 clients)
	Physical or sensory disability	4	3	7
	Mental health problems	3	3	6
	Based on the above data, 13 out of 30 clients (i.e. 24.9%) accessing the service fell within a disability related category.			
	Disabled members of the Gypsy and Travellers community may find accessing support which is delivered through this service difficult. They may also experience further harassment or discrimination because of their disability in the event of MATU and the Travellers Health Service not			

	being able to provide relevant support or signposting to mainstream services.												
Gender Reassignment	<p>Gender Reassignment is not part of the client record data submitted therefore unable to give an analysis based on clients who are accessing the service.</p> <p>Some Gypsy and Travellers may experience harassment or discrimination because they are transgender and will need to access appropriate support and advice. This may increase in the event of MATU and the Travellers Health Service not being able to provide relevant support or signposting to mainstream services.</p>												
Marriage and Civil Partnership	This protected characteristic would not be solely impacted by the gap in service provision.												
Pregnancy and Maternity	<p>Pregnancy and Maternity is not part of the client record data submitted therefore unable to give an analysis based on clients who are accessing the service.</p> <p>Some members Gypsy and Travellers community may find accessing services specific for this service group difficult. There may be a lack of support in the event of the Travellers Health Service not being able to provide relevant support to pregnant and postnatal Gypsies and Travellers.</p>												
Race	<p>A breakdown by ethnicity of the client record data submitted as part of contract monitoring shows:</p> <table><tr><th>Ethnicity</th><th>2012-13 – Q1-4</th><th>2013-14 – Q1-3</th><th>Total across all quarters (out of 30 clients)</th></tr><tr><td>Gypsy/Romany/Irish Traveller</td><td>17</td><td>11</td><td>28</td></tr><tr><td>White: Irish</td><td>2</td><td>0</td><td>2</td></tr></table> <p>Based on the above data, it is clear that the majority of clients accessing the service are from a Gypsy/Romany/Irish Traveller background.</p> <p>Some members of the Gypsy and Travellers community may experience harassment or discrimination because of their ethnic origin and may need to access appropriate support and advice. This may increase in the event of MATU and the Travellers Health Service not being able to provide relevant support or signposting to mainstream services.</p>	Ethnicity	2012-13 – Q1-4	2013-14 – Q1-3	Total across all quarters (out of 30 clients)	Gypsy/Romany/Irish Traveller	17	11	28	White: Irish	2	0	2
Ethnicity	2012-13 – Q1-4	2013-14 – Q1-3	Total across all quarters (out of 30 clients)										
Gypsy/Romany/Irish Traveller	17	11	28										
White: Irish	2	0	2										
Religion or Belief	<p>Religion or Belief is not part of the client record data submitted therefore unable to give an analysis based on clients who are accessing the service.</p> <p>Some members of the Gypsy and Travellers community may experience harassment or discrimination because of their religion or belief and may need to access appropriate support and advice. This may increase in the event of MATU</p>												

	and the Travellers Health Service not being able to provide relevant support or signposting to mainstream services.												
Sex	<p>A breakdown by age of the client record data submitted as part of contract monitoring shows:</p> <table><tr><td>Gender</td><td>2012-13 – Q1-4</td><td>2013-14 – Q1-3</td></tr><tr><td>Male</td><td>3</td><td>16</td></tr><tr><td>Female</td><td>4</td><td>7</td></tr><tr><td>Total across all quarters (out of 30 clients)</td><td>7</td><td>23</td></tr></table> <p>Some members of the Gypsy and Travellers community may experience harassment or discrimination because of their gender and may need to access appropriate support and advice. This may increase in the event of MATU and the Travellers Health Service not being able to provide relevant support or signposting to mainstream services.</p>	Gender	2012-13 – Q1-4	2013-14 – Q1-3	Male	3	16	Female	4	7	Total across all quarters (out of 30 clients)	7	23
Gender	2012-13 – Q1-4	2013-14 – Q1-3											
Male	3	16											
Female	4	7											
Total across all quarters (out of 30 clients)	7	23											
Sexual Orientation	<p>Sexual Orientation is not part of the client record data submitted therefore unable to give an analysis based on clients who are accessing the service.</p> <p>Some members of the Gypsy and Travellers community may experience harassment or discrimination because of their sexual orientation and will need to access appropriate support and advice. This may increase in the event of MATU and the Travellers Health Service not being able to provide relevant support or signposting to mainstream services.</p>												
Other groups e.g. rural isolation, deprivation, health inequality, carers, asylum seeker and refugee communities, looked after children, deprived or disadvantaged communities	<p>Some members of the Gypsy and Travellers community may experience an increase in movement and homelessness with potentially more illegal encampments in the City and/or County as a result of the gap in service provision.</p> <p>The Welfare Reform may have a disproportionate effect on larger families within the Gypsy and Travellers community as they may tend to have an increase in rent or charges less affordable. This is particularly relevant for those in receipt of Child Benefit and Housing Benefit.</p> <p>Some members of the Gypsy and Travellers community may find accessing support which is delivered through this service difficult where literacy is an issue. There would be an effect on those individuals in the event of MATU and the Travellers Health Service not being able to provide relevant support or signposting to mainstream services.</p>												
Community Cohesion	<p>The gap in service provision could lead to deprivation and disadvantaging some individuals, as well as having an adverse impact on community cohesion between the Gypsy and Travellers community and other community groups.</p>												

### Step 3: Data Collection & Evidence

In relation to your related findings in 'Step Two' are your presumptions on these barriers based on any existing research, data evidence or other information?

**What evidence, research, data and other information do you have which will be relevant to this EIA?**

**What does this information / data tell you about each of the diverse groups?**

The following information is from the Leicestershire Housing Related Support Strategy (2010-15) and evidences the need for provision of the service based on the client group:

*"Gypsies and Travellers fall into four distinct categories in terms of where they live:*

- *local authority owned caravan sites*
- *privately owned caravan sites*
- *roadside encampments*
- *privately owned and socially rented houses*
- *The needs of each vary but there are common issues:*
  - *a lack of available sites across the county*
  - *difficulty in accessing existing official sites due to long waiting lists*
  - *difficulty in accessing housing (usually used as a last resort because of the because of the lack of available sites) due to Allocation Policies 12-month residency rule, local connection issues etc.*
- *The concept of housing and housing-related support as defined in this strategy is not readily understood by the Gypsy and Traveller Community, who tend to see asking for external help as a last resort;*
- *Socially rented tenancies can only last for a short period of time, with many ending in eviction due to lack of support in the early stages;*
- *Gypsies and Travellers generally stay within the same county and/or border areas and may need help to find somewhere to live or help with housing when these needs cannot be met by their families or their Gypsies and Travellers Liaison Officer;*
- *Gypsies and travellers living in trailers need support to cope with issues around quality, repair and buying new;"*

The Leicestershire Housing Related Support Strategy (2010-15) details that there is a need for floating support for Gypsies and Travellers within the County and to work with other local authorities (e.g. Leicester City) to address the above needs. The Strategy also states that the needs should be addressed through working in partnership with local health authorities, in particular Travellers' Health Officers. The actions identified within the Strategy in respect of delivering housing related support services for gypsies and travellers addressed these needs.

Equalities information was submitted to LCC by Leicester City Council STAR with regards to the potential impacts on the client group as a result of the termination of contract. This information supports the potential impact stated within this EIA Report and the supporting EIA Questionnaire.

The equalities information submitted by Leicester City Council STAR also details the current usage based on the contracted hours for the service of 40 direct support hours per week of floating support with a baseline of 20 service users, across the County. The level of support offered varies, dependent on the needs of individual service users, but overall the service provides support of approximately 2 hours support per service user per week. The number of service users who accessed the service over the last four quarters is 50.

**What further research, data or evidence may be required to fill any gaps in your understanding of the potential or known affects of the policy?**

**Have you considered carrying out new data or research?**

Further data may be required over the next 12 months in relation to monitoring the levels of potential impacts on the Gypsy and Travellers community to ensure that the mitigations in place are appropriate.

Discussions will take place between partners to understand what data and information is currently available to support this monitoring, how will it be collated and analysed, and how feedback will be assessed. Partners that may be involved include the Compliance (Non-Regulated) Team, Strategic Planning and Commissioning, Market Development, MATU and the Travellers Health Service.

#### Step 4: Consultation and Involvement

When considering how you to consult and involve people as part of the proposed policy/ procedure/ function/ service, it is important to think about the service users and staff who may be affected as part of the proposal.

**Have you consulted on this policy/ procedure/ function or service?**

**Outline any consultation and the outcomes of the consultation in relation to this EIA.**

No formal consultation involving service users or staff has taken place in relation to the termination if the contract from LCC or Leicester City Council STAR.

Leicester City Council STAR stated that they have consulted with senior management internally with regards to the financial implications of the contract as part of reviewing the capacity to deliver the service, as well as with MATU. This consultation did not focus on the impact on service users. Staff were considered and Leicester City Council STAR stated that termination of the contract incorporated service efficiencies with no current direct impact upon permanent staff.

The termination of contract will be as of 31<sup>st</sup> March 2014 leaving very little time to undertake any specific consultation with existing service users or customers. It is recognised that the gypsy and traveller community may be a difficult group to engage and consult with should the opportunity for consultation arise within current timescales.

LCC will continue to involve partners as part of discussions and work to develop and implement mitigations.

LCC will also be conducting formal consultation from April 2014 on the Early Intervention and Prevention model. Aspects of this will include considerations for the needs of the Gypsy and Travellers community and how mainstream services will address the needs.

**Do any of the barriers you identified *actually* exist based on this consultation?**

No current barriers have been identified as formal consultation has not taken place.

#### Step 5: Mitigating and assessing the impact

In relation to any research, data, consultation and information you have reviewed and/or carried out as part of this EIA, it is now essential to assess the impact of the policy/ procedure/ function/ service and distinguish whether a particular group could be affected differently in either a negative or positive way?

**If you consider there to be actual or potential adverse impact or discrimination, please outline this below. State whether it is justifiable or legitimate and give reasons.**

It is considered that there will be an adverse impact on the Gypsy and Travellers community, and that this impact is justifiable or legitimate due to the provider choosing to terminate the contract. The negotiation and agreement to terminate the contract was completed in line with the relevant terms and conditions of the contract.

Discussions have begun to consider whether there are any alternatives to current service provision that may be used to mitigate against the gap in service provision. One potential alternative, yet to be discussed and explored fully, is to negotiate with the Multi Agency

**Traveller Unit (MATU) an arrangement and some funding to pick up the workload and offer some support, along with utilising current services and support provided by the Travellers Health Service in terms of signposting to mainstream services if appropriate. Funding for any alternative would come from the money set aside for the contract which had been extended up to a maximum of 30<sup>th</sup> September 2015.**

**N.B.**

a) If you have identified adverse impact or discrimination that is illegal, you are required to take action to remedy this immediately.

b) If you have identified adverse impact or discrimination that is justifiable or legitimate, you will need to consider what actions can be taken to mitigate its effect on those groups of people.

**What can be done to change the policy/ procedure/ function/ service to mitigate any adverse impact?**

**Consider what barriers you can remove, whether reasonable adjustments may be necessary and how any unmet needs that you have identified can be addressed.**

**Leicester City Council STAR stated that they cannot change the decision to terminate the contract as they are unable to continue to subsidise the contract.**

**Barriers for the Gypsy and Traveller community that need to be considered as part of these discussions include:**

- the high level of discrimination experienced
- difficulties in accessing services
- lack of trust and confidence in many agencies

**Utilising the positive links with the Gypsy and Traveller community that MATU and the Travellers Health Service already have could support addressing these barriers. It is estimated by the MATU management that any new provider of this contract would take 2-3 years to build up the trust of the community, which could lead to disengagement with many agencies.**

**The current services for Travelling Families Services across Leicester, Leicestershire and Rutland provided by partners which can mitigate against the potential impacts are:**

- Commissioned by Clinical Commissioning Groups;
  - Travelling Families Service (Leicestershire Partnership Trust, LPT)
  - Market Harborough Medical Practice - it is likely that this service is to be decommissioned when the new specialist hub service model is implemented
  - GP Cultural Awareness training (delivered by Health Ambassadors)
- Commissioned by LCC
  - Multi Agency Travellers Unit (MATU)
- Commissioned by Public Health (for 3 years from April 2014):
  - An additional post to the travelling families service (LPT)
  - Health Ambassadors (that will also develop into Health Trainers later in the year, again LPT)

**The option to recommission the service is also being considered and will need to be explored fully the Compliance (Non-Regulated) Team, Strategic Planning and Commissioning and Market Development in line with procurement rules. This includes transferring some of the funding to MATU to support Leicestershire service users, insource to MATU and apply TUPE, or competitively tender.**

**The option to recommission the service needs to consider the timescales indicated above to build trust of the community will need to be considered as they do not align with the Early Intervention and Prevention Programme. This could have an adverse impact on the Gypsy and Traveller community in terms of further deprivation and disadvantaging individuals, as well as**

general community cohesion.

## Step 6: Making a decision

**Summarise your findings and give an overview of whether the policy will meet Leicestershire County Council's responsibilities in relation to equality, diversity and human rights.**

The potential impacts for the LCC and the Gypsy and Travellers community have been considered. The findings are that there will be an adverse impact on the Gypsy and Travellers community. These impacts have been assessed as justifiable or legitimate due to the provider choosing to terminate the contract as per the terms and conditions within the contract.

It is the responsibility of the Adults and Communities Department to provision a service based on the needs of the Gypsy and Traveller community and to consider implementation for mitigation against any potential impacts.

## Step 7: Monitoring, evaluation & review of your policy/ procedure/service change

**How will you monitor the impact and effectiveness of the new policy/ procedure/ service change and what monitoring systems will you put in place to monitor this and to promote equality of opportunity and make positive improvements?**

Discussions will take place between partners to understand what data and information is currently available to support a system of monitoring the impact and effectiveness as a result of the termination of contract. A system of monitoring, including how data and information will be analysed, and how feedback will be assessed needs is being agreed between the partners.

**How will the recommendations of this assessment be built into wider planning and review processes?**

e.g. policy reviews, annual plans and use of performance management systems.

The recommendations from this assessment and from the monitoring systems will need to take place over the next 12 months, with the findings being considered as part of the Early Intervention and Prevention Programme.

Discussions with the MATU and the Travellers Health Service have the potential to highlight strategies or recommendations which can support future strategic planning and service delivery with partners to help meet the needs of the Gypsy and Travellers community.



## Equality Improvement Plan

Please list all the equality objectives, actions and targets that result from the Equality Impact Assessment (continue on separate sheets as necessary). These now need to be included in the relevant service plan for mainstreaming and performance management purposes.

Equality Objective	Action	Target	Officer(s) Responsible	By when
To mitigate against potential impacts for the LCC and the Gypsy and Traveller community as a result of the termination of contract	To continue discussions with partners on whether there are any alternatives to current service provision that may be used to mitigate against the gap in service provision.	On-going	Amanda Nunn (Compliance) Ian Mellor (Strategic Planning and Commissioning) Vicki Hodges (Market Development)	End of April 2014
To monitor the potential impacts for the LCC and the Gypsy and Traveller community as a result of the termination of contract	To agree with partners a system of monitoring the impact and effectiveness as a result of the termination of contract using current information and data which partners have.	On-going	Amanda Nunn (Compliance) Ian Mellor (Strategic Planning and Commissioning) Vicki Hodges (Market Development)	End of April 2014
To ensure the relevant departmental governance arrangement is in agreement of the mitigations	To take the potential options for mitigation to Departmental Equalities Group (DEG) for approval.	On-going	Amanda Nunn (Compliance) Ian Mellor (Strategic Planning and Commissioning)	Next DEG Meeting (after March 2014)
To ensure the relevant departmental governance arrangement is kept up to date with any progress	To keep the DEG updated with developments and progress from discussions with partners, as well as findings from the system of monitoring	On-going	Amanda Nunn (Compliance) Ian Mellor (Strategic Planning and Commissioning)	On-going

2<sup>nd</sup> Authorised Signature (Member of DMT): ... *Deather Broughton*

Date: 02/04/2014

**Once completed, please send a copy of this form to the Departmental Equalities Group for quality assurance. Once authorised, this Equality Impact Assessment (EIA) Report will need to be published on our website.**