

Equality & Human Rights Impact Assessment (EHRIA)

This Equality and Human Rights Impact Assessment (EHRIA) will enable you to assess the **new, proposed or significantly changed** policy/ practice/ procedure/ function/ service** for equality and human rights implications.

Undertaking this assessment will help you to identify whether or not this policy/ practice/ procedure/ function/ service** may have an adverse impact on a particular community or group of people. It will ultimately ensure that, as an Authority, we do not discriminate and we are able to promote equality, diversity and human rights.

Please refer to the EHRIA [guidance](#) before completing this form. If you need any further information about undertaking and completing the assessment, contact your [Departmental Equalities Group](#) or equality@leics.gov.uk

***Please note: The term 'policy' will be used throughout this assessment as shorthand for policy, practice, procedure, function or service.*

Key Details	
Name of policy being assessed:	Consultation on the review and provision of In-house CLC services
Department and section:	Adults & Communities Department – Direct Services
Name of lead officer/ job title and others completing this assessment:	Heather Pick: Assistant Director – Direct Services Zubear Patel: Service Manager – Direct Services
Contact telephone numbers:	0116 3057553 0116 3057351
Name of officer/s responsible for implementing this policy:	Heather Pick: Assistant Director – Direct Services
Date EHRIA assessment started:	20/05/2021
Date EHRIA assessment completed:	Reviewed: 23 November 2021.

Section 1: Defining the policy

Section 1: Defining the policy

You should begin this assessment by defining and outlining the scope of the policy. You should consider the impact or likely impact of the policy in relation to all areas of equality, diversity and human rights as outlined in Leicestershire County Council's [Equality Strategy](#).

1	<p>What is new or changed in the policy? <i>What has changed and why?</i></p> <ol style="list-style-type: none"> 1. There are currently 112 people accessing in-house CLC services across 10 building- based services. Capacity to deliver in-house CLC services to their pre-pandemic level has been severely limited due to Covid-19 restrictions and social distancing requirements. Service user engagement has continued throughout this period but the number of people accessing services can be summarised as follows: <ul style="list-style-type: none"> • 29% of people returning to building-based services; • 7% of people receiving outreach support into people's homes; • 63% of people receiving weekly welfare checks by telephone. 2. Over time the Council's share of the CLC market has been steadily reducing. Consideration is now being given to how best to use the resources available to the Council to deliver the right outcomes for service users. 3. To that end the Council proposes focusing its in-house services on crisis care, short term reablement and enablement, and support for carers through the delivery of a responsive seven day a week service, and ceasing the provision of long term maintenance CLC support. 4. The pandemic and the upcoming procurement of the CLC framework have expedited the need to consider alternative delivery methods and work is planned to test the external market to establish whether capacity can be developed to meet the needs of people who attend in-house CLC services. Consultation with all current in-house CLC service users will also be needed as detailed below. It is expected that this work will not be concluded by the time the new CLC Framework is live, but flexibility to periodically open the Framework for new providers will accommodate the proposed changes if these are agreed. <p><u>Consultation on changes to in-house services</u></p> <ol style="list-style-type: none"> 5. It is proposed that a consultation be undertaken with those who currently access in-house CLC services on the premise of reducing and refocusing the existing in-house service offer to a short term seven day responsive enablement/reablement CLC service from Short Breaks locations. The consultation will run August to October 2021 (8 weeks) and seek to identify individual needs and outcomes and use this data to contribute to the development of the new CLC framework, ensuring that the market can offer the type and range of services required to meet needs and achieve outcomes for service users. 6. There are currently 112 people accessing in-house CLC services. Reviews would need to be completed to ensure that the Council meaningfully gains people's views and fully understands the impact of this proposed change and mitigations possible. Advocacy support would be accessed as necessary for service users and their families/carers to ensure that any barriers to engagement are managed.
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	<p>7. The outcome of the consultation will provide information which will be used to shape and develop the CLC market to ensure they can provide innovative, customer tailored service provision where necessary and ensure that there is sufficient capacity to support the transition of services.</p> <p>8. Subject to service user feedback and the market being able to provide the type and range of services required, a transitional period would be provided to enable the market to develop and mobilise and provide the least disruption to in-house CLC service users. An indicative timeline for this review and implementation if the proposed changes are adopted is:</p> <ul style="list-style-type: none"> • Review of needs May to August 2021 • Consultation August to October 2021 • Transition from January 2022 onwards • Decommission/closure from Spring 2022 onwards <p>9. Consultation will also be undertaken with the existing staff group employed in in-house CLC services, who are currently temporarily redeployed to other critical roles within the Department. This will be needed as the proposals seek to establish a responsive seven day service and to align working arrangements with other direct care services delivered in-house.</p> <p>10. Cabinet approved the request for consultation on the future In-House CLC service provision on 22 June 2021.</p> <p>11. The Cabinet report will seek approval to fully consult on the proposals including this draft EHRIA, with all relevant stakeholders, including service users, relatives & carers, staff, partners, members and the community to identify all relevant issues and concerns and potential mitigations</p> <p>12. Subject to agreement of the proposals contained in this report, the outcome of the consultation along with an updated EHRIA will be reported back to cabinet in December 2021.</p>
2	<p>Does this relate to any other policy within your department, the Council or with other partner organisations? <i>If yes, please reference the relevant policy or EHRIA. If unknown, further investigation may be required.</i></p> <p>N/a</p>
3	<p>Who are the people/ groups (target groups) affected and what is the intended change or outcome for them?</p> <p>The public consultation will involve five key groups:</p> <ul style="list-style-type: none"> • People who access In-House CLC building based services. • Carers and/or Families. • Staff and trade unions. • Council Members and members of the public. • Stakeholders, community groups and partner organisations. <p>Any decision on the options for the transitional service reduction/decommissioning will not be taken until consultation has taken place and the views of the above taken fully into account and balanced against any issues highlighted and mitigations identified.</p> <p>The following requirements for the consultation process will be adhered to:</p> <ul style="list-style-type: none"> • Consultation must be at a time when the proposals are still at a formative stage.

	<ul style="list-style-type: none"> • The County Council must give sufficient reasons for any proposals to permit intelligent consideration and response. • Adequate time must be given for those affected to consider and respond. • The product of consultation must be conscientiously taken into account when finalising any proposals. <p>The consultation aims to:</p> <ul style="list-style-type: none"> • Allow interested parties to input their views on the options. • Provide a variety of ways for people and groups to access the consultation. • Enhance the information available to Members and so improve the quality of the decision making. <p>The public consultation will also provide a structure to:</p> <ul style="list-style-type: none"> • Allow interested parties to input their views on the proposals. • Provide a variety of ways for people and groups to access that consultation including: <ul style="list-style-type: none"> ○ An online questionnaire and supporting information available to the general public of Leicestershire on the LCC website (with separate easy read version) ○ Dedicated email address. ○ Dedicated telephone helpline. ○ Freepost address to return and paper copies of questionnaires. <p>Information will be available in different formats upon request and dedicated support workers will assist with face-to face consultation with service users. Advocacy services and translation services will also be used where appropriate.</p> <p>The consultation will take place over a period of 56 days (8 weeks).</p>		
4	Will the policy meet the Equality Act 2010 requirements to have due regard to the need to meet any of the following aspects? (Please tick and explain how)		
		Yes	No
	Eliminate unlawful discrimination, harassment and victimisation	x	<p>How?</p> <p>It should be acknowledged that the consultation proposals are likely to result in increased anxiety in the short term, which is a common natural consequence of change.</p> <p>The users of this service are particularly vulnerable and therefore the impact of any changes on those who use the services needs to be carefully considered.</p> <p>However, there is no expectation for this consultation on the proposals set out above to have any adverse impact on people accessing In-house CLC services in respect of the equalities requirements.</p> <p>Consultation with existing staff, service users, their families/carers and the general public will be undertaken to understand potential perceived and actual impacts prior to a final decision being made prior to proceeding with the final decision on the proposals.</p>

				<p>We will encourage service user advocates to express the wishes and feelings of affected service users in a variety of ways:</p> <ul style="list-style-type: none"> • Direct advocacy through family members • Independent advocacy services • Access to translation services • Support from LCC social care workers where required. <p>Leicestershire County Council and the Adults & Communities Department adheres to robust Equalities, Diversity and Human Rights policies in its delivery of service, both statutory and non-statutory.</p>
	Advance equality of opportunity between different groups	x		As above
	Foster good relations between different groups	x		As above

Section 2: Equality and Human Rights Impact Assessment (EHRIA) Screening

Section 2: Equality and Human Rights Impact Assessment Screening

The purpose of this section of the assessment is to help you decide if a full EHRIA is required.

If you have already identified that a full EHRIA is needed for a policy/ practice/ procedure/ function/ service, either via service planning processes or other means, then please go straight to Section 3 on Page 7 of this document.

Section 2 A: Research and Consultation			
		Yes	No*
5	Have the target groups been consulted about the following?		
	a) their current needs and aspirations and what is important to them;	X	
	b) any potential impact of this change on them (positive and negative, intended and unintended);	X	
	c) potential barriers they may face	X	
6	If the target groups have not been consulted directly, have representatives been consulted or research explored (e.g. Equality Mapping)?	X	
7	Have other stakeholder groups/ secondary groups (e.g. carers of service users) been explored in terms of potential unintended impacts?	X	
*If you answered 'no' to the questions above, please use the space below to outline either what consultation you are planning to undertake or why you do not consider it to be necessary.			
8	<p>Following Cabinet approval, the consultation adopted the following methodology:</p> <ul style="list-style-type: none"> An online questionnaire open and available to the general public of Leicestershire on the LCC website. Targeted promotion of the consultation through the local media and establishments such as In-house CLC building base provisions, to ensure the public and potential/ future users are encouraged to participate in the consultation. Any gaps in responses will be identified during the consultation and used to inform further promotion. Support will be provided from the Corporate Communications & Digital Team. There will be opportunities for face to face meetings arranged for current users of in-house CLC services and their families and carers. This will be organised and promoted through individual invitation letters. The consultation process will also be assisted by Corporate Campaigns and Data and Business Intelligence in the design of the questionnaires, ongoing monitoring of the online questionnaire and analysis of the responses upon completion of the consultation process. 		

	<ul style="list-style-type: none"> We will work to support all users to be involved and that opportunities for collective responses are facilitated where this is possible, and in consideration of current restrictions in place as a result of the Covid-19 pandemic.
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Section 2 B: Monitoring Impact			
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9	Are there systems set up to:	Yes	No
	a) monitor impact (positive and negative, intended and unintended) for different groups	X	
	b) enable open feedback and suggestions from different communities	X	

Note: If no to Question 9, you will need to ensure that monitoring systems are established to check for impact on the protected characteristics.

Section 2 C: Potential Impact			
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10	Use the table below to specify if any individuals or community groups who identify with any of the ' protected characteristics ' may potentially be affected by the policy and describe any positive and negative impacts, including any barriers.			
		Yes	No	Comments
	Age		X	<p>A breakdown of ages of people using in-house CLC services is as follows: 13% are aged 18-29 23% are aged 30-39 21% are aged 40-49 19% are aged 50-59 14% are aged 60-69 10% are aged over 70 and over.</p> <p>Consultation with families and carers will be central to the success of the consultation.</p> <p>Support will be made available to ensure that information is readily available and understood to support equitable access to the consultation process.</p>
	Disability	X		<p>The 112 service users who access the in-house CLC services. The majority (84%) of people are recorded to have a learning disability as their primary category of need. 14% of people are recorded as older persons and the remaining 2% of people are recorded to have a physical need as a primary need.</p>

			<p>People accessing this service have a wide range of support needs associated with both their learning disability and physical need, as well as autism, epilepsy, sensory impairment, mental health support and behaviours that challenge services.</p> <p>The consultation will look to identify if people with different types or severities of disability will be differentially affected by the changes. Individual care reviews will identify future needs of service users ensuring where possible a neutral or positive impact on service delivery.</p>
	Gender Reassignment		<p>X</p> <p>No specific impact identified.</p>
	Marriage and Civil Partnership		<p>X</p> <p>See above.</p>
	Pregnancy and Maternity		<p>X</p> <p>No impact identified.</p>
	Race		<p>X</p> <p>80% of people accessing the in-house CLC services identify as White British. 14% of people identify as Asian British. 6% of people identify into other ethnic groups.</p> <p>It will be ensured that the current users of In-house CLC services have appropriate support to meet their cultural needs during the consultation process.</p> <p>This will be achieved by working with managers who know the individuals well and since they are already accessing services, meaning specific needs associated with race will be identified.</p>
	Religion or Belief		<p>X</p> <p>Some religion/belief data is available for the people who access in-house CLC services. 39% of people identify as being Christian. A significant proportion of people do not have this data recorded or it is unspecified (48%).</p>

				As part of the consultation process the religious or other beliefs of affected users will be taken into account.
	Sex		X	<p>54% of people accessing the in-house CLC services are female with the remaining 46% being male.</p> <p>Whilst this means that there may be a very slight disproportionate impact on females, the numbers are low and this is neither intentional nor is there anything which can be done to mitigate this gender imbalance.</p>
	Sexual Orientation		X	LCC Adult Social Care is required to provide a service that does not discriminate on grounds of sexual orientation as per the Council's policies and procedures and there will be no barriers to accessing the consultation based on sexual orientation
	Other groups e.g. rural isolation, deprivation, health inequality, carers, asylum seeker and refugee communities, looked after children, deprived or disadvantaged communities		X	<p>All access to Social Care Services in Leicestershire is dependent on the national minimum eligibility thresholds for adults and carers as out in Section 13 of the Care Act 2014 and in the Care and Support (Eligibility Criteria) Regulations 2014.</p> <p>As part of an individual care needs assessment or review the commissioning worker will identify if any person has specific needs. For example; this might be related to communication where their first language is not English and then interpreters and written information about the service will be provided in the appropriate language.</p> <p>Individual care reviews will identify future needs of service users and their carers ensuring where possible a neutral or positive impact on service delivery.</p>

	Community Cohesion		X	It is not envisaged that the consultation on the above proposals will lead to a reduction in social cohesion. We will ensure that people are empowered and enabled to fully access their rights and freedoms as a member of society with regard to having their say in the consultation process. This will be ensured by having a robust communication plan in the promotion of the consultation.
11	<p>Are the human rights of individuals <i>potentially</i> affected by this proposal? Could there be an impact on human rights for any of the protected characteristics? (Please tick)</p> <p>Explain why you consider that any particular article in the Human Rights Act may apply to the policy/ practice/ function or procedure and how the human rights of individuals are likely to be affected below: [NB: include positive and negative impacts as well as barriers in benefiting from the above proposal]</p>			
		Yes	No	Comments
	Part 1: The Convention- Rights and Freedoms			
	Article 2: Right to life		X	<p>This article imposes a positive obligation on councils to take steps to safeguard life, applicable in circumstances such as this where a decision may have a negative impact on life expectancy.</p> <p>These dangers can be offset considerably by taking into account the wishes of those directly affected and managing any necessary transfers of service provision carefully and sensitively.</p>
	Article 3: Right not to be tortured or treated in an inhuman or degrading way		X	<p>Services are provided so not to expose a person to degrading treatment. Due to the complex learning, physical and mental health needs and vulnerability of individuals who receive these services, there is often a personal care element to the support provided. This is provided by suitably skilled and trained members of staff who are able to deliver dignified personal care services.</p> <p>Staff delivering the service should all have received training in relation to Safeguarding and Whistleblowing</p>

			policies and procedures, to ensure that people receive appropriate support in the right way
Article 4: Right not to be subjected to slavery/ forced labour		X	As above.
Article 5: Right to liberty and security		X	Security in building based CLC service provision should not restrict movement unduly or be achieved via excessive restraint. Where appropriate, Deprivation of Liberty assessments will have been completed and authorised appropriately, clearly setting out the least restrictive way support should be delivered.
Article 6: Right to a fair trial		X	As with all LCC services, service users are made aware of their right to access the Corporate complaints procedure.
Article 7: No punishment without law		X	As above.
Article 8: Right to respect for private and family life		X	In-house CLC services are available to people supported by informal/ unpaid carers to provide respite to carers and the cared for person. The proposal to reduce and/or close such a service acknowledges the potential impact this could have on this Article and the need for mitigating actions. The consultation process will ensure that there are opportunities to, and carers are encouraged to, identify any barriers to their involvement with the aim of providing support or identifying alternative methods of involvement.
Article 9: Right to freedom of thought, conscience and religion		X	As mentioned above the consultation process will encourage participation and will take into account the requirements of individuals and their views, by providing a variety of methods for residents, carers, families and advocates to participate, and will respect human rights in line with legal requirements and current case law.
Article 10: Right to freedom of expression		X	As above.
Article 11: Right to freedom of assembly and association		X	No impact identified.
Article 12: Right to marry		X	No impact identified.
Article 14: Right not to be discriminated against		X	Leicestershire County Council and the Adults & Communities Department adhere to robust Equalities and Diversity policies in

				its delivery of service, both statutory and non-statutory.
Part 2: The First Protocol				
	Article 1: Protection of property/peaceful enjoyment		X	No impact identified.
	Article 2: Right to education		x	No impact identified.
	Article 3: Right to free elections		x	No impact identified.
Section 2 D: Decision				
12	Is there evidence or any other reason to suggest that:	Yes	No	Unknown
	a) the policy could have a different affect or adverse impact on any section of the community;		X	
	b) any section of the community may face barriers in benefiting from the proposal		X	
<p>Based on the answers to the questions above, what is the likely impact of the policy</p> <p>The new CLC framework will address the current services gaps we have in the market and will allow new providers to join and develop services for people with physical disabilities, mental health conditions, those with profound and multiple learning disabilities, people with autism, and those living with dementia. This means that people will have more choice available to them as there will be more providers available in the market to meet their specific needs.</p>				
13	No Impact <input type="checkbox"/>	Positive Impact <input type="checkbox"/>	Neutral Impact <input checked="" type="checkbox"/>	Negative Impact or Impact Unknown <input type="checkbox"/>
Note: If the decision is 'Negative Impact' or 'Impact Not Known', an EHRIA Report is required.				
14	Is an EHRIA report required?	<input type="checkbox"/>	<input type="checkbox"/> No	

Section 2: Completion of EHRIA Screening

Upon completion of the screening section of this assessment, you should have identified whether an EHRIA Report is required for further investigation of the impacts of this policy.

Option 1: If you identified that an EHRIA Report *is required*, continue to Section 3 on Page 7 of this document.

Option 2: If there are no equality, diversity or human rights impacts identified and an EHRIA report ***is not required***, continue to Section 4 on Page 14 of this document.

Section 3: Equality and Human Rights Impact Assessment (EHRIA) Report

Section 3: Equality and Human Rights Impact Assessment Report

This part of the assessment will help you to think **thoroughly** about the impact of the policy and to critically examine whether it is **likely** to have a positive or negative impact on different groups within our diverse communities. It should also identify any barriers that may adversely affect under-represented communities or groups that may be disadvantaged by the way in which we carry out our business.

Using the information gathered either within the EHRIA Screening or independently of this process, this EHRIA Report should be used to consider the impact or likely impact of the policy in relation to all areas of equality, diversity and human rights as outlined in Leicestershire County Council's Equality Strategy.

Section 3 A: Research and Consultation

When considering the target groups, it is important to think about whether new data needs to be collected or whether there is any existing research that can be utilised.

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| 15. | Based on the gaps identified either in the EHRIA Screening or independently of this process, how have you now explored the following and what does this information/ data tell you about each of the diverse groups? |
| | <ul style="list-style-type: none"> a) current needs and aspirations and what is important to individuals and community groups (including human rights); b) likely impacts (positive and negative, intended and unintended) to individuals and community groups (including human rights); c) likely barriers that individuals and community groups may face (including human rights) |

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| 16. | Is any further research, data collection or evidence required to fill any gaps in your understanding of the potential or known effects of the policy on target groups? |
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When considering who is affected by this proposed policy, it is important to think about consulting with and involving a range of service users, staff or other stakeholders who may be affected as part of the proposal.

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| 17. | Based on the gaps identified either in the EHRIA Screening or independently of this process, how have you further consulted with those affected on the likely impact and what does this consultation tell you about each of the diverse groups? |
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| 18. | Is any further consultation required to fill any gaps in your understanding of the potential or known effects of the policy on target groups? |
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Section 3

B: Recognised Impact

19.	Based on any evidence and findings, use the table below to specify if any individuals or community groups who identify with any 'protected characteristics' are likely to be affected by this policy. Describe any positive and negative impacts, including what barriers these individuals or groups may face.	
		Comments
	Age	
	Disability	
	Gender Reassignment	
	Marriage and Civil Partnership	
	Pregnancy and Maternity	
	Race	
	Religion or Belief	
	Sex	
	Sexual Orientation	
	Other groups e.g. rural isolation, deprivation, health inequality, carers, asylum seeker and refugee communities, looked after children, deprived or disadvantaged communities	
	Community Cohesion	

20.	Based on any evidence and findings, use the table below to specify if any particular Articles in the Human Rights Act are likely to apply to the policy. Are the human rights of any individuals or community groups affected by this proposal? Is there an impact on human rights for any of the protected characteristics?	
		Comments
	Part 1: The Convention- Rights and Freedoms	
	Article 2: Right to life	
	Article 3: Right not to be tortured or treated in an inhuman or degrading way	
	Article 4: Right not to be subjected to slavery/ forced labour	

	Article 5: Right to liberty and security	
	Article 6: Right to a fair trial	
	Article 7: No punishment without law	
	Article 8: Right to respect for private and family life	
	Article 9: Right to freedom of thought, conscience and religion	
	Article 10: Right to freedom of expression	
	Article 11: Right to freedom of assembly and association	
	Article 12: Right to marry	
	Article 14: Right not to be discriminated against	
	Part 2: The First Protocol	
	Article 1: Protection of property/ peaceful enjoyment	
	Article 2: Right to education	
	Article 3: Right to free elections	

Section 3	
C: Mitigating and Assessing the Impact	
Taking into account the research, data, consultation and information you have reviewed and/ or carried out as part of this EHRIA, it is now essential to assess the impact of the policy.	
21.	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.
<p>NB:</p> <ul style="list-style-type: none"> i. If you have identified adverse impact or discrimination that is illegal, you are required to take action to remedy this immediately. ii. 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. 	
22.	<p>Where there are potential barriers, negative impacts identified and/ or barriers or impacts are unknown, please outline how you propose to minimise all negative impact or discrimination.</p> <ul style="list-style-type: none"> a) include any relevant research and consultation findings which highlight the best way in which to minimise negative impact or discrimination b) consider what barriers you can remove, whether reasonable adjustments may be necessary and how any unmet needs that you have identified can be addressed

	c) if you are not addressing any negative impacts (including human rights) or potential barriers identified for a particular group, please explain why
Section 3 D: Making a decision	
23.	Summarise your findings and give an overview as to whether the policy will meet Leicestershire County Council's responsibilities in relation to equality, diversity, community cohesion and human rights.

Section 3 E: Monitoring, evaluation & review of the policy	
24.	Are there processes in place to review the findings of this EHRIA and make appropriate changes? In particular, how will you monitor potential barriers and any positive/ negative impact
25.	How will the recommendations of this assessment be built into wider planning and review processes? <i>e.g. policy reviews, annual plans and use of performance management systems</i>

Section 3:
F: Equality and human rights improvement plan

Please list all the equality objectives, actions and targets that result from the Equality and Human Rights Impact Assessment (EHRIA) (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 Responsible	By when

Section 4: Sign off and scrutiny

Upon completion, the Lead Officer completing this assessment is required to sign the document in the section below.

It is required that this Equality and Human Rights Impact Assessment (EHRIA) is scrutinised by your Departmental Equalities Group and signed off by the Chair of the Group.

Once scrutiny and sign off has taken place, a depersonalised version of this EHRIA should be published on Leicestershire County Council's website. Please send a copy of this form to the Digital Services Team via web@leics.gov.uk for publishing.

Section 4 A: Sign Off and Scrutiny

Confirm, as appropriate, which elements of the EHRIA have been completed and are required for sign off and scrutiny.

Equality and Human Rights Assessment Screening

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Equality and Human Rights Assessment Report

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1st Authorised Signature (EHRIA Lead Officer):

A&C: Heather Pick (Assistant Director)

Date:

C&FS: Sharon Cooke (Assistant Director)

Date:

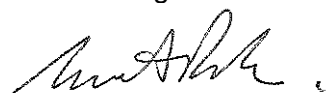
2nd Authorised Signature (DEG Chair A&C):



(Nigel Thomas)

Date: 25/10/2021

2nd Authorised Signature:



(Heather Pick, Assistant Director)

Date: 25/10/2021