

Equality Impact Assessment (EIA) Report Form

This form should be completed for each Equality Impact Assessment on a new or existing function, a reduction or closure of service, any policy, procedure, strategy, plan or project which has been screened and found relevant to Equality and Diversity.

Please refer to the 'Equality Impact Assessment Guidance' while completing this form. If you would like further guidance please contact the Corporate Strategy Team or your directorate Heads of Service Equality Champion.

Where do you work?
Service Area: Route 16
Directorate: CYPS

(a) This EIA is being completed for a...

Service/ Proposal	Policy/ Function	Procedure	Project	Strategy	Plan
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

(b) Please name and describe below...

Route 16 Financial Policy - Neath Port Talbot County Borough Council currently provides a comprehensive and generous financial support package for young people in and leaving Local Authority Care. With due consideration to the need to reduce expenditure, whilst continuing to meet our statutory duties and duty of care, it is proposed that the existing policy is amended and updated in line with the requirements of the Social Services and Well-being Act 2014.

(c) It was initially screened for relevance to Equality and Diversity on 27th October 2016

(d) It was found to be relevant to...

Age.....	<input checked="" type="checkbox"/>	Race	<input type="checkbox"/>
Disability.....	<input type="checkbox"/>	Religion or belief.....	<input type="checkbox"/>
Gender reassignment	<input type="checkbox"/>	Sex	<input type="checkbox"/>
Marriage & civil partnership	<input type="checkbox"/>	Sexual orientation.....	<input type="checkbox"/>
Pregnancy and maternity	<input type="checkbox"/>	Welsh language	<input type="checkbox"/>

(e) Lead Officer

Name: Rebecca Jones

Job title: Manager

Date: 11th January 2017

(f) Approved by Head of Service

Name: Andrew Jarrett

Date: 18th January 2017

Section 1 – Aims (See guidance):

Briefly describe the aims of the function, service, policy, procedure, strategy, plan, proposal or project

What are the aims?

To provide a coherent and clear Financial Policy for Route 16 which adheres to our legislative responsibilities and meets the needs of our client group

Who has responsibility?

Director of Social Services- Head of Children's Service – Principal Officer (Fostering and LAC) – Team Manager (Route 16) – Route 16 Team

- **Who are the stakeholders?**
- Young People aged 14 and over
- Foster Carers
- Supervising Social Workers
- Independent Reviewing Officers
- Existing Service Users and their families
- Local Comprehensive Schools
- Local Colleges
- Local Universities
- Supported Lodgings providers
- Dewis
- Housing
- Potential Service Users and their families
- Social Work teams
- CSSIW
- Elected Members
- Leader, Chief Executive and Corporate Directors
- Local AM's and MP's
- Trade Union
- Social Landlords
- CAB
- Local and Regional Media
- Wider community in NPT
- Community Councils
- NPTCBC Staff
- NPT Local Service Board
- Other LA's

Section 2 - Information

(a) Service Users

Please tick what information you know about your service users and provide details / evidence of how this information is collected.

Age.....	X	Race	X
Disability.....	X	Religion or belief.....	X

Gender reassignment	X	Sex	X
Marriage & civil partnership	X	Sexual orientation.....	X
Pregnancy and maternity	X	Welsh language	X

What information do you know about your service users and how is this information collected?

182 open cases. 90 female. 92 male.

All the variables above are covered in the assessment process. The following basic information is saved on the EDF – Age, gender, race, marital status, religion, pregnancy/parent and disability. Sexual orientation and gender reassignment are discussed during assessment. The Welsh Language active offer is in place.

Education and employments status (particular relevance for this matter)

Not in education, training or employment – NEET(fit for work) – 25% In custody 3% Disabled/unfit for work 2%

Full time parent 8%

In education training or employment - University 5.5% Further Education 25% Employed 13% Work training Scheme 4% Pre-Voc course 3% In education (school) 9% Apprenticeships 2.5%

Any Actions Required?

To ensure that a copy of the policy is available in Welsh upon request.

CYPE to consider if Participation Premium should be retained as an incentive to reduce NEET figures and encourage young people into education and employment, despite the potential cost to the Local Authority.

What information do you know and how is this information collected?

- **Attainment gap regarding GCSE's between Care Leavers and the rest of the population has widened by 6% since 2008 (Department for Education, 2013)**
- **2016: 38.7% of all 19 yr old Care Leavers in Wales were classed as NEET (StatsWales 2016) – this is over twice the level of their peers (19% - gov.wales)**

Comparable financial support provided by neighbouring Welsh Local Authorities. Information collected from direct discussion with relevant Team Managers.

Support provided by other Local Authorities

Local Authority	Financial incentives	Rewards	WMA - university
			All LA pay for non-term time accommodation in line with the Social Services and Well-being Act 2014 and provide a Higher Education Bursary as required by Welsh

			Government (a total of £2000 over the duration of the course)
NPT	Yes - £12.10 pw	Yes	Yes - £60.50 pw plus £15 utilities
BCBC	No	No	Accommodation paid for and WMA £44.30 pw
Newport	No	No	No
Ceredigion	No	No	Holiday time only - £57 pw. All accommodation paid for.
RCT	No	No	No
CCBC	No	No	Tuition fees paid and accommodation 52 weeks per year. No WMA.
Powys	No	No	Accommodation costs met which include the £2000 HE Bursary Holiday allowance £300 per year Clothing - £400 per year No WMA
Glamorgan	No	No	Accommodation paid (full year) WMA - £57.90 per week
Torfaen	No	No	WMA provided £58 per week
Swansea	No	No	Means tested based on accommodation costs and out-goings.
Any Actions Required? No.			

(b) General
Section 3 – Impact

(a) Impact on Protected Characteristics

Please consider the possible impact on people with different protected characteristics. This could be based on service user information, data, consultation and research or professional experience (e.g. comments and complaints).

	Positive	Negative	Neutral	Needs further investigation
Age	➡ <input type="checkbox"/>	X	<input type="checkbox"/>	<input type="checkbox"/>
Disability	➡ <input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>
Gender reassignment	➡ <input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>
Marriage & civil partnership	➡ <input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>
Pregnancy and maternity	➡ <input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>
Race	➡ <input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>
Religion or belief	➡ <input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>
Sex	➡ <input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>
Sexual orientation	➡ <input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>
Welsh language	➡ <input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>

Thinking about your answers above, please explain (in detail) why this is the case. Include details of any consultation (and/or other information) which has been undertaken to support your view.

The Policy is applicable to young people who are open to Route 16. The reduction in qualification payments and the removal of the participation premium will therefore have a negative impact on young people coming through the service in the future compared to those young people who have received the service to date.

No evidence has been found of a similar incentive or reward scheme running in other Local Authorities so they will not be disadvantaged compared to their counterparts in other areas. In addition, a number of incentive schemes now run (EMA and training allowance for example) which will reduce the impact of the removal of the participation premium.

If members were minded to retain the Participation premium, this will be honoured, and a paragraph has been included in the proposed policy in italic for consideration.

(b) Impact on the Welsh Language

What is the likely impact of the policy on:

- **Opportunities for people to use Welsh**
- **The equal treatment of the Welsh and English languages**

Please give details

The Council's ethos to eliminate discrimination, harassment and victimisation as well as to advance equality of opportunity between different groups permeates its plans and policies.

The policy will be made available in Welsh upon request in accordance with the Council's requirements under the Welsh Language Standards.

Could the policy be developed to improve positive impacts or lessen negative impacts?

Please give details

Policy can be translated into Welsh upon request.

Actions (to increase positive/mitigate adverse impact). To ensure that a copy of the policy is available in Welsh upon request.

Section 4 - Other Impacts:

Please consider how the initiative might address the following issues.

You could base this on service user information, data, consultation and research or professional experience (e.g. comments and complaints).

(a) Equalities

Public Sector Equality Duty (PSED)

- to eliminate discrimination, harassment and victimisation;
- to advance equality of opportunity between different groups; and
- to foster good relations between different groups

Please explain any possible impact on meeting the Public Sector Equality Duty

It is acknowledged that there are negative impacts on a particular group of people as a result of these proposals as compared to the same group in previous years.

- young people in continuing education, training or unpaid employment post 16
- young people who achieve academic qualifications

Given the noted attainment gap between LAC and Care Leavers and the general population and the significantly higher number of Care Leavers who are NEET, then consideration may be given to the retention of the Participation Premium at this time, to continue to act as an incentive to engagement.

What work have you already done to improve the above?

Review of the decision to remove the qualification payment – the proposal now is to provide qualification payments at a lower rate.

Provide options for CYPS to consider in respect of the removal of the Participation Premium

Actions (to mitigate adverse impact or to address identified gaps in knowledge).

Review of the decision to remove the qualification payment – the proposal now is to provide qualification payments at a lower rate.

Proposal for consideration to be given to the following options –

- the Participation Premium to be retained within the Financial Policy
- the Participation Premium to be removed from Financial Policy from 1st April 2017 but retained for a transition period of no more than 4 months (the end of the 2017 academic year) to allow for young people to prepare for the reduction in income
- the Participation Premium to be removed from Financial Policy from 1st April 2017

(b) Reduce Social Exclusion and Poverty

Please explain any possible impact

Risks: The removal of the participation premium may act as a disincentive to young people accessing training/education.

The removal of the qualification payment may act as a disincentive to young people accessing training/education.

The removal of the participation premium will reduce the income of young people in education/training by £12.10 per week (term time only) which may increase financial hardship.

Maximum loss of income for a young person in education - £459.80 per year

Maximum loss of income for a young person in education/unpaid employment - £629.20 per year

What work have you already done to improve the above?

Review of the decision to remove the qualification payment – the proposal now is to provide qualification payments at a lower rate.

Provide options for CYPS to consider in respect of the removal of the Participation Premium

Actions (to mitigate adverse impact or to address identified gaps in knowledge).

The previous section summarises the potential impacts of the proposals and identifies the mechanisms by which any such impacts will be identified, monitored and minimised.

(c) Community Cohesion

Is the initiative likely to have an impact on Community Cohesion?

The policy is unlikely to have a significant impact on Community Cohesion. The new Policy is clearer in respect of what the LA has a legal and statutory duty to provide and the amounts. There is greater scope for discretionary support to be provided, including the provision of driving lessons to increase mobility and improve the employment options of young people.

Actions (to mitigate adverse impact or to address identified gaps in knowledge).

The previous section summarises the potential impacts of the proposals and identifies the mechanisms by which any such impacts will be identified, monitored and minimised.

What consultation and engagement has been undertaken (e.g. with the public and/or members of protected groups) to support the views in section 3 and 4?

Following the decision of Cabinet to approve consultation on the proposals for the updated Financial Policy a 60 day consultation period on the proposed policy took place from 8th November 2016. A detailed consultation plan was developed, to ensure that all stakeholders had the opportunity to comment, with particular consideration to current and future recipients of Route 16 Support.

In line with the Consultation Plan, Consultation Booklets were sent out to all identified stakeholders including the 190 young people open to Route 16. To date, no consultation booklets have been returned. Discussions with individual worker's indicate that the booklets have been received and support offered to complete them has been offered.

Consultations documents were also sent to professional stakeholders, including IRO Service, Looked After Children Education, Looked After Children Team, The Fostering Team and Dewis.

Three open access consultation sessions for professionals and young people were held across the Local Authority.

Any actions required (to mitigate adverse impact or to address identified gaps in knowledge)

With due regard to feedback (see below), a revised list of Qualification Payments has been provided for consideration. This will form an addendum to the Financial Policy if approved.

Assuming CYPE approve the proposed Policy, a letter confirming the changes will be sent out to all affected individuals to give them due notice of the changes prior to the Policy coming into effect on the 1st April 2017. I also respectfully request that participation allowance continues to be paid to those young people already in receipt of this payment until the end of this academic year (no later than 22nd July 2017) to allow them time to budget for the changes.

Section 6 – Post Consultation

What was the outcome of the consultation?

The only attendee was the Assistant Manager: Student Support (Student Services) representing NPTC Group.

Feedback provided on behalf of NPT and Afan Colleges. Feedback provided verbally at consultation session on the 28th November 2016 and transcribed from notes:

NPTC Group representative advised that, speaking as a representative of the college, she and her colleagues recognised that financial pressures on the Local Authority and the need to make continued savings, they felt that it would be inappropriate and punitive to withdraw the qualification rewards payments in their entirety. Representative noted that LAC and Care Leavers continue to achieve less well academically than their counterparts (put in reference) and that academic and vocational achievements are often made in spite of disadvantageous circumstances. The financial rewards provided by Route 16 are not only monetary payments but a recognition of these achievements, of the distance travelled by the young person and a symbol of our support.

Representative stated that they recognised that the current Qualification Payments needed to be revised as they were significantly above that which a 'normal family' would be able to provide. Representative suggested that the payments were retained but at a lower rate that would be more sustainable and reasonable given the current economic climate. This should also reduce the sense of indignation from young people who are coming through a system where a precedent has been set in terms of financial reward provision.

Given that no booklets have been returned, no contact made with the Team to raise any objections (directly or indirectly) and the lack of engagement with the open access consultation sessions, we can therefore assume there are no other matters of dissent.

Section 7 - Monitoring arrangements:

Please explain the arrangements in place (or those which will be put in place) to monitor the impact of this function, service, policy, procedure, strategy, plan or project:

Monitoring arrangements:

The policy will require review on an annual basis to ensure that it continues to meet the needs of the service and client group.

Actions: Review to be undertaken by Team Manager and due process followed should amendment or updating be required.

Section 8 – Outcomes:

Having completed sections 1-5, please indicate which of the outcomes listed below applies to your initiative (refer to guidance for further information on this section).

Outcome 1: Continue the initiative...

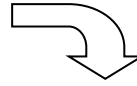
X

Outcome 2: Adjust the initiative...

X (see proposed
adjustments covered in the
body of the form)

Outcome 3: Justify the initiative...

Outcome 4: Stop and remove the initiative...

☐

For outcome 3, detail the justification for proceeding here

Section 9 - Publication arrangements:

Information on the publication arrangements for equality impact assessments is available in the guidance notes

Action Plan:

Objective What are we going to do and why?	Who will be responsible for seeing it is done?	When will it be done by?	Outcome How will we know we have achieved our objective?	Progress
Policy to be implemented on 1st April 2017.	Route 16 Team manager subject to CYPE approval	1st April 2017	Policy will be in place	
Policy to be available on line and with the option of translation provided.	Route 16 Team Manager to forward to appropriate person	1st April 2017	Policy will be available on line	
Letters outlining changes to be sent out to all affected persons if required.	Route 16 Team Manager	1st March 2017	Letters will be sent out in good time to provide notice to young people impacted by changes	

*** Please remember to be 'SMART' when completing your action plan.**