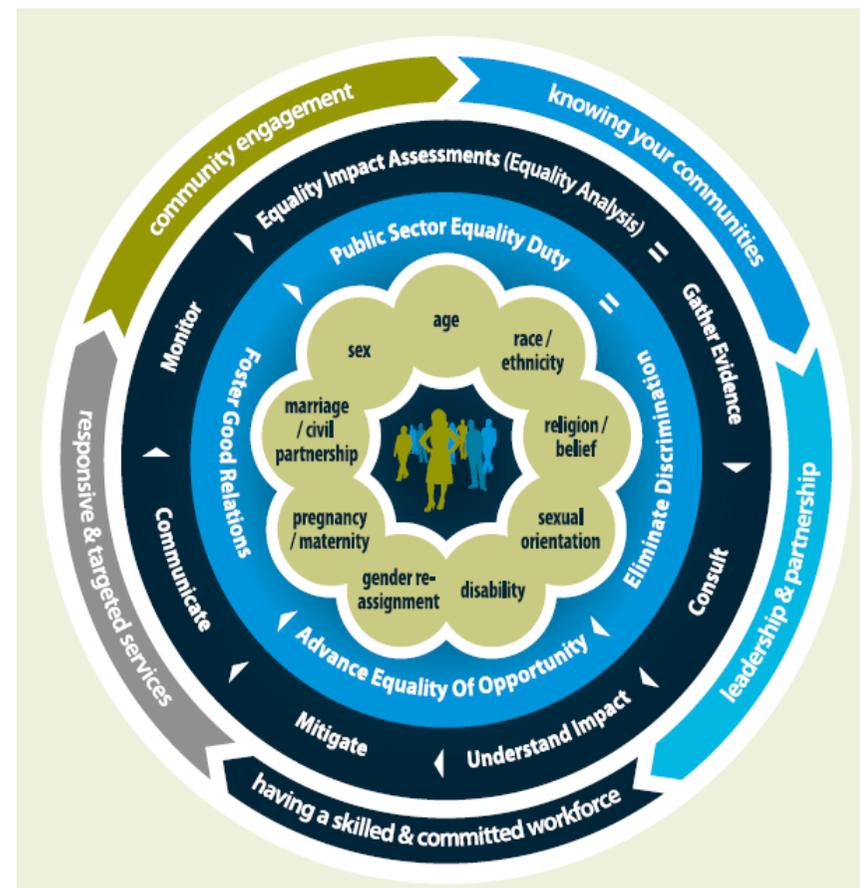


Equality Impact Assessment (EqIA): SEND Information, Advice and Support Strategy 2019-2021

EqIAs make services better for everyone and support value for money by getting services right first time.

EqIAs enable us to consider all the information about a service, policy or strategy from an equalities perspective and then create an action plan to get the best outcomes for staff and service-users¹. They analyse how all our work as a council might impact differently on different groups protected from discrimination by the Equality Act 2010². They help us make good decisions and evidence how we have reached them.³

An EqIA needs to be completed **as a project starts** to identify and consider possible differential impacts on people and their lives, inform project planning and, where appropriate, identify mitigating actions. It must be completed **before** any decisions are made or policy agreed so that the EqIA **informs that decision or policy**. It is also a live document; you should review and update it along with your project plan throughout.



Full guidance notes to help you are embedded in this form – see the End Notes or hover the mouse over the numbered notes. If your project/proposal relates primarily to staff – e.g. a restructure – there is a specific EqIA template for this [here](#)

Please share your initial EqIA with the equalities team, equalities@hertfordshire.gov.uk and the final/updated version at the end of the project. Key EqIAs should be reviewed by the relevant Head of Service. Examples of EqIAs can be seen in the [EqIA Library](#).

1. Who is completing the EqlA⁴ and why is it being done?

Title of service / proposal / project / strategy / procurement you are assessing⁵	Special Educational Needs and / or Disabilities Information, Advice and Support Strategy (SEND IAS Strategy)
Names of those involved in completing the EqlA	David Butcher and Sue Chapman
Head of Service or Business Manager	David Butcher
Team/Department	Transforming SEND services, Children’s Services
Lead officer contact details	Sue Chapman, Children’s Services, HCC Sue.chapman@hertfordshire.gov.uk 01992 555 269 (internal 25269)
Focus of EqlA – what are you assessing?⁶ What are the aims of the service, proposal, project? What outcomes do you want to achieve? What are the reasons for the proposal or change? Do you need to reference/consider any related projects?	<p>The SEND Transformation Programme of activity has been developed to address key areas of improvement for the service and service delivery, one of which is SEND Information, Advice and Support (SEND IAS).</p> <p>Our vision is for quality, accessible information, advice and support to be available to children and young people aged 0-25 with special educational needs and/or disabilities (SEND) and their families. This should be available when they need it so that they can live happy and fulfilling lives. Feedback from the last Ofsted SEND inspection and parents and carers has told us that it can be hard for families to find the information and advice they need.</p> <p>Families have also told us:</p> <ul style="list-style-type: none"> • that they want to be able to help themselves wherever possible. We call this self-help • that they want the same information and advice whether they find it themselves online or receive it from a professional (from any service). We refer to this as the <i>one truth</i> • that being able to talk confidentially to someone with good SEND knowledge in terms of the law and local SEND policy and procedures, would help them to make sense of the information and advice they may have found themselves <p>We are proposing a new and improved way to deliver information, advice and support to help achieve this shared vision. There will be no reduction to the amount of money we spend on providing SEND information and advice</p>

services. As the proposals are considered to be changes to our SEND Local Offer we are inviting feedback on the proposed strategy from the public and professionals, for the next 12 weeks consultation. This assessment will be updated to incorporate learning from the consultation.

The reasons we are proposing changes are:

- Changes in legislation have impacted on the delivery of SEND information, advice and support:
 - [The Children and Families Act 2014](#) requires all Local Authorities in England to deliver more effective information and advice. There is also an increasing number of children and young people with SEND in Hertfordshire that need to be supported by Hertfordshire's Local Offer
 - The [SEND Code of Practice 0-25 years requires](#) social care, education and health services to work together to invest in impartial and confidential SEND information, advice and support to be delivered by a SEND Information, Advice and Support Service (SENDIASS) in each Local Authority, which have to comply with National Minimum Standards
- Changes to Hertfordshire's Local Offer website have been well received by families:
 - parents and carers are now able to apply for the Short Breaks Local Offer (SBLO) online
 - parents and carers have told us that we need to build on these improvements by having a single telephone number and opportunities for face to face support, if their needs cannot be met by the Local Offer webpages alone
- Currently Hertfordshire is working to achieve better outcomes for families, through the Transforming SEND services programme. This includes simplifying families' experiences, making best use of our resources, facilitating self-help and the *one truth* approach.

What is the proposed new way to offer SEND information, advice and support?

KIDS Hubs were commissioned a few years before the widescale SEND reforms in 2014 to provide SEND information-based services. KIDS currently provide additional SEND related services in Hertfordshire that are not commissioned by the County Council, for example a specialist toy and equipment library. The council's contract with KIDS to provide KIDS Hubs is

due to come to an end on 31 October 2020 and cannot be extended any further.

As a result of these reforms in 2014, SENDIASS has broadened its statutory (legal) responsibility to encompass the provision of information, advice and support regarding health, social care and education. The new SEND information, advice and support offer, includes a proposal to use this funding from 1 November 2020, to strengthen the SENDIASS offer to deliver more telephone and face to face support across the county.

As well as building on current resources, this proposal aims to simplify how families' access SEND information, advice and support, by promoting one telephone number and one email address alongside the Local Offer website.

Co-production is at the heart of this proposal

The proposal has been discussed and developed involving representatives from Herts Parent Carer Involvement (HPCI) and professionals within the County Council. Research into the current service and impact of any changes has been completed along with using feedback from parents and carers, and Carers in Hertfordshire, both of which have been used to help develop this proposal.

Seeing familiar issues and processes through new eyes and producing solutions together with families is key to our ambition. It's been at the heart of our redesigned online Local Offer website focusing on finding digital solutions to life's offline challenges for SEND families. If the proposal is agreed, we want to ensure a strengthened SENDIASS offer, making better use of technology, social media and professional partnerships, to help children and young people aged 0-25 with SEND and their families, find the right information and advice.

Opportunities being considered include:

- a phonenumber open Monday-Friday between 9:30-3:30pm, except on bank holidays
- bookable sessions to speak with an advisor over the phone or by video call (e.g. WhatsApp or Facetime)
- workshops you can attend locally or watch online
- general information, advice and support on social media (Facebook and Twitter)

The following definitions are used for the purpose of this strategy:

- a) A child or young person has SEND if he or she:
 - has a significantly greater difficulty in learning than the majority of others of the same age, (sometimes referred to as Special Educational Needs: SEN) or
 - has a disability which prevents or impacts upon him or her from making use of educational facilities, generally provided for others of the same age in mainstream educational settings
- b) Information is any fact, set of facts or knowledge, communicated by others or obtained by personal study or investigation
- c) Advice is a recommendation when a person provides information about their situation
- d) Support is any goods or service that helps a person overcome barriers that may get in the way of carrying out activities of daily living

Stakeholders

Who will be affected?

Which protected characteristics (*see end-notes 11-20*)

is it most relevant to?

Consider the public, service users, partners, staff, Members, etc

The SEND IAS strategy will impact and involve the following groups:

1. Hertfordshire Children and Young people with SEND and their families/ carers
2. Parent and carer led groups: Herts Parents & Carers Involvement, Carers in Hertfordshire, Angels, ADD-Advance, Families in Focus
3. Voluntary sector organisations: including Kids, Action for Children
4. Hertfordshire County Council staff and practitioners across Children's Services including 0-25 Together/ SENDIASS/ Integrated Services for Learning (ISL) / Commissioning / YC Herts/ Early Help services (Families First)/ adult information, advice and support services including libraries
5. Primary and Secondary school staff across mainstream and special needs provision
6. Early Years providers
7. Further education providers
8. Commissioned family support services: Delivering Special Provision Locally, Local School Partnerships, Family Centres
9. Commissioned wider support services: Citizen Advice Bureau, HCC Customers Service Centre
10. NHS partners including: Clinical Commissioning Groups (CCGs), Herts Partnership Foundation Trust (HPFT), Herts Community Trust (HCT), West Herts Hospital Trust, East and North Herts Trust, Positive Behaviour, Autism, Learning disability and Mental Health Services

(PALMS), Child and Adolescent Mental Health Services (CAMHS)
 11. Elected Members
 12. District Councils

2. List of data sources used for this EqlA (include relevant national/local data, research, monitoring information, service user feedback, complaints, audits, consultations, EqlAs from other projects or other local authorities, etc.)

A range of useful local data on our communities can be found on [Herts Insight](#) and on the [Equalities Hub](#)

Title and brief description (of data, research or engagement – include hyperlinks if available)	Date	Gaps in data Consider any gaps you need to address and add any relevant actions to the action plan in Section 4.
National Statistics: Special educational needs in England: January 2019 Information from the school census on pupils with special educational needs (SEN) and SEN provision in schools https://www.gov.uk/government/statistics/special-educational-needs-in-england-january-2019	2019 - revised	
National Minimum Standards for SENDIASS, Council for Disabled Children SENDIASS Steering Group completed self-assessment against Nat. Min. Standards, which deemed the service to be partly meeting the standards.	2017	Gaps in delivery form a comprehensive strategic action plan, supported by a recently conducted review of SENDIASS.
Hertfordshire's Joint Strategic Needs Assessment- Autism Spectrum Disorder	Dec 2018	There is no register or precise count of people with Autism Spectrum Disorder (ASD) under diagnosed in females and people at the lower end of the autism spectrum, so our knowledge of the needs of these cohorts particularly is limited.

<p>SEND IAS review 2017 Report findings shaped the SEND IAS proposals, with co-production at the heart.</p>	<p>April 2017</p>	
<p>SEND Assurance Report Report is in draft, although key themes agreed at Nov. 2019 SEND Senior Leadership Group.</p>	<p>Nov 2019</p>	
<p>SENDIASS review</p>	<p>Jan 2020</p>	<p>Report is in draft.</p>
<p>Local Offer Website development co-production conversations</p>	<p>Ongoing</p>	
<p><u>Reducing Parental Conflict Digital Report</u>, Department for Work and Pensions. A report on how parents in low-income households that experience parental conflict search for help online and the digital support they need. Although a different topic, some of the learning about how parents access IAS online is relevant for SEND IAS Strategy.</p>	<p>June 2019</p>	

3. Analysis and assessment: review of information, impact analysis and mitigating actions

Protected characteristic group	<p>What do you know⁷? What do people tell you⁸?</p> <p>Summary of data and feedback about service users and the wider community/ public</p> <ul style="list-style-type: none"> • Who uses the service? • Who doesn't and why? • Feedback/complaints? • Any differences in outcomes? Why? 	<p>What does this mean – what are the potential impacts of the proposal(s)⁹?</p> <p>- Consider positive and negative impacts - On service users / the public - <i>AND, where relevant, staff*</i></p> <p><i>* if your proposals relate mainly to a staff restructure or reorganisation, you should use the template here</i></p>	<p>What can you do¹⁰?</p> <p>What reasonable mitigations to reduce or avoid the impact can you propose?</p> <p>How will you communicate/engage or provide services differently to create a 'level playing field' – e.g. consultation materials in easy read or hold targeted engagement events</p> <p><i>If there is no current way of mitigating any negative impacts, clearly state that here and consider other actions you could take in the action plan in section 4.</i></p>
Age ¹¹	<p>The SEND IAS offer is for all Children and young people (CPY) aged 0-25 and their parents/ carers because any CYP can have SEND at any time in their lives.</p> <p>23% of Hertfordshire's population are children or young people, of this number 7195 CYP (aged 0-25) in Hertfordshire have an Education Health and Care Plan (EHCP).</p> <p>Requests for EHCP increase in Year 6, which indicates that parents/ carers of children aged 10/11 are a priority group to be in need of information, advice and support.</p> <p>Feedback from parents/</p>	<p>CYP of all ages (0-25) and their families will benefit from knowing there is one number to speak to someone in relation to their SEND question from Autumn 2020.</p> <p>CYP of all ages (0-25) and staff supporting these CYP and their families may feel that they have a reduced SEND IAS service.</p>	<p>Ensure SEND IAS strategy and helpline is promoted and understood to be for all CYP with SEND age 0-25.</p>

Protected characteristic group	What do you know⁷? What do people tell you⁸? Summary of data and feedback about service users and the wider community/ public <ul style="list-style-type: none"> • Who uses the service? • Who doesn't and why? • Feedback/complaints? • Any differences in outcomes? Why? 	What does this mean – what are the potential impacts of the proposal(s)⁹? - Consider positive and negative impacts - On service users / the public - <i>AND, where relevant, staff*</i> <i>* if your proposals relate mainly to a staff restructure or reorganisation, you should use the template here</i>	What can you do¹⁰? What reasonable mitigations to reduce or avoid the impact can you propose? How will you communicate/engage or provide services differently to create a 'level playing field' – e.g. consultation materials in easy read or hold targeted engagement events <i>If there is no current way of mitigating any negative impacts, clearly state that here and consider other actions you could take in the action plan in section 4.</i>
	<p>carers tell us that they want information regarding diagnosis and pathways to be easy to find and easy to understand.</p> <p>Public and professionals use the currently commissioned Kids Hubs. The ages of the CYP who are supported by IAS provided by Kids Hubs, are as yet unknown.</p>		
Disability¹²	<p>The SEND IAS offer will support CYP with a wide range of special needs and disabilities.</p> <p>The current commissioned provider has a reputation amongst professionals and public for supporting families to access Short Breaks local offer (SBLO), which is now accessed online via Local Offer.</p>	<p>Although not true, there may be a perception amongst some staff and members of the public that the current commissioned provider is the only place to access short breaks local offer.</p> <p>Although not true, there may be a perception amongst some staff and members of the public that SENDIASS, as proposed single helpline provider only supports specialist SEND cases, and has less knowledge and experience in relation to disabilities.</p>	<p>Communications plan to bust myths in relation to SENDIASS expertise to support families in relation to SEN and disabilities and accessing SBLO via online Local Offer.</p> <p>HCC KIDS Hubs contract manager to continue to work with KIDS Hubs, supporting them to consider next steps for services they deliver outside of the HCC commissioned service.</p> <p>Clarifying and promoting the role and responsibility of universal services in relation to SEND IAS will improve access to it.</p>

Protected characteristic group	What do you know⁷? What do people tell you⁸? Summary of data and feedback about service users and the wider community/ public <ul style="list-style-type: none"> • Who uses the service? • Who doesn't and why? • Feedback/complaints? • Any differences in outcomes? Why? 	What does this mean – what are the potential impacts of the proposal(s)⁹? - Consider positive and negative impacts - On service users / the public - <i>AND, where relevant, staff*</i> <i>* if your proposals relate mainly to a staff restructure or reorganisation, you should use the template here</i>	What can you do¹⁰? What reasonable mitigations to reduce or avoid the impact can you propose? How will you communicate/engage or provide services differently to create a 'level playing field' – e.g. consultation materials in easy read or hold targeted engagement events <i>If there is no current way of mitigating any negative impacts, clearly state that here and consider other actions you could take in the action plan in section 4.</i>
	Survey conducted autumn 2019 as part of SENDIASS review, suggested professionals do not understand breadth and depth of SENDIASS offer, particularly that it support families with children with disabilities and all SEND families requiring lower levels of intervention. Current commissioned provider hosts additional support not commissioned by HCC but which may be at risk if provider is not recommissioned: <ul style="list-style-type: none"> • Toy and equipment library reported to have 294 members. • EHCP application workshops More broadly SENDIASS will continue to develop its approach and offer to meet the 	Additionally offered services may impact parents who want to try specialist toys and equipment, learn about applying for EHCPs, and access 1-1 sleep training. Access to SEND IAS for parents/ carers with SEND themselves will be improved, a trusted arms-length, confidential service providing face to face and non-face to face IAS across all levels of need.	

Protected characteristic group	<p>What do you know⁷? What do people tell you⁸?</p> <p>Summary of data and feedback about service users and the wider community/ public</p> <ul style="list-style-type: none"> • Who uses the service? • Who doesn't and why? • Feedback/complaints? • Any differences in outcomes? Why? 	<p>What does this mean – what are the potential impacts of the proposal(s)⁹?</p> <p>- Consider positive and negative impacts - On service users / the public - <i>AND, where relevant, staff*</i></p> <p><i>* if your proposals relate mainly to a staff restructure or reorganisation, you should use the template here</i></p>	<p>What can you do¹⁰?</p> <p>What reasonable mitigations to reduce or avoid the impact can you propose?</p> <p>How will you communicate/engage or provide services differently to create a 'level playing field' – e.g. consultation materials in easy read or hold targeted engagement events</p> <p><i>If there is no current way of mitigating any negative impacts, clearly state that here and consider other actions you could take in the action plan in section 4.</i></p>
	<p>needs of parents and families around ECHP process.</p> <ul style="list-style-type: none"> • Sleep training <p>Assuming 1 in 100 people are on the autism spectrum and 1 in 10 have dyslexia, many parents/ carers of children with SEND may experience barriers in accessing the IAS they need to meet their children's needs. By rationalising IAS access points by having a single number to call and exploring alternative non face to face contact options (texting, webchat etc.) parental accessibility will be improved.</p>		
<p>Gender reassignment¹³</p>	<p>The SEND IAS offer does not directly include or focus on the gender reassignment community but needs and requirements for this will need to be included as part of</p>	<p>No identified potential impacts on this group from the proposals however, this position will be monitored.</p>	<p>Any family with a child with or suspected to have SEND, must be able to access SEND IAS, including parents/ carers and/ or their children who have undergone gender reassignment.</p>

Protected characteristic group	What do you know⁷? What do people tell you⁸? Summary of data and feedback about service users and the wider community/ public <ul style="list-style-type: none"> • Who uses the service? • Who doesn't and why? • Feedback/complaints? • Any differences in outcomes? Why? 	What does this mean – what are the potential impacts of the proposal(s)⁹? - Consider positive and negative impacts - On service users / the public - <i>AND, where relevant, staff*</i> <i>* if your proposals relate mainly to a staff restructure or reorganisation, you should use the template here</i>	What can you do¹⁰? What reasonable mitigations to reduce or avoid the impact can you propose? How will you communicate/engage or provide services differently to create a 'level playing field' – e.g. consultation materials in easy read or hold targeted engagement events <i>If there is no current way of mitigating any negative impacts, clearly state that here and consider other actions you could take in the action plan in section 4.</i>
	the general population.		
Pregnancy and maternity ¹⁴	Families expecting a new child will be accessing pregnancy related support in hospital/ clinics / GP surgeries and family centre settings. They may take older siblings with them to these appointments and ask questions/ be receptive to a conversation about their older child's SEND existing/ potential needs.	Acute and community health services have a role to play in identifying and responding to SEND IAS in terms of tailored signposting.	Communications plan to understand and meet the needs of these stakeholders.
Race ¹⁵	The SEND IAS offer will support CYP with SEND and their families from a range of ethnicities, backgrounds and language. Ensuring IAS is meeting accessibility requirements is a principle of the IAS strategy.	Families from some backgrounds may not access some IAS due to stigma associated with having a child with SEND. Opportunities to access SEND IAS will be improved as the IAS offer will be clarified, rationalised and single helpline provided by a trusted arms-length, confidential service providing	Clarifying and promoting the role and responsibility of universal services in relation to SEND IAS will improve access to it. Communications plan to raise the profile of SEND IAS access points, particularly SENDIASS.

Protected characteristic group	What do you know⁷? What do people tell you⁸? Summary of data and feedback about service users and the wider community/ public <ul style="list-style-type: none"> • Who uses the service? • Who doesn't and why? • Feedback/complaints? • Any differences in outcomes? Why? 	What does this mean – what are the potential impacts of the proposal(s)⁹? - Consider positive and negative impacts - On service users / the public - <i>AND, where relevant, staff*</i> <i>* if your proposals relate mainly to a staff restructure or reorganisation, you should use the template here</i>	What can you do¹⁰? What reasonable mitigations to reduce or avoid the impact can you propose? How will you communicate/engage or provide services differently to create a 'level playing field' – e.g. consultation materials in easy read or hold targeted engagement events <i>If there is no current way of mitigating any negative impacts, clearly state that here and consider other actions you could take in the action plan in section 4.</i>
		face to face and non-face to face IAS across all levels of need, supported by translation services as appropriate.	
Religion or belief¹⁶	The SEND IAS offer will support CYP with SEND from all religions and beliefs.	No identified potential impacts on this group from the proposals however, this position will be monitored.	Any family with a child with or suspected to have SEND, must be able to access SEND IAS, including parents/ carers and/ or their children of any religion.
Sex/Gender¹⁷	The SEND IAS offer will support CYP with SEND regardless of their sex or gender. Prevalence of autism spectrum disorder is higher amongst males in Hertfordshire, which is a pattern in the rest of the country however, this is perceived by subject matter experts to be contrary to reality.	Families with children and young people of all sex and gender need to have access to quality and appropriate information. No identified potential impacts on this group from the proposals however, this position will be monitored.	Any family with a child with or suspected to have SEND, must be able to access SEND IAS, including parents/ carers and/ or their children of any religion.

Protected characteristic group	What do you know⁷? What do people tell you⁸? Summary of data and feedback about service users and the wider community/ public <ul style="list-style-type: none"> • Who uses the service? • Who doesn't and why? • Feedback/complaints? • Any differences in outcomes? Why? 	What does this mean – what are the potential impacts of the proposal(s)⁹? - Consider positive and negative impacts - On service users / the public - <i>AND, where relevant, staff*</i> <i>* if your proposals relate mainly to a staff restructure or reorganisation, you should use the template here</i>	What can you do¹⁰? What reasonable mitigations to reduce or avoid the impact can you propose? How will you communicate/engage or provide services differently to create a 'level playing field' – e.g. consultation materials in easy read or hold targeted engagement events <i>If there is no current way of mitigating any negative impacts, clearly state that here and consider other actions you could take in the action plan in section 4.</i>
Sexual orientation¹⁸	The SEND IAS offer will support CYP with SEND regardless of their sexual orientation.	No identified potential impacts on this group from the proposals however, this position will be monitored.	Any family with a child with or suspected to have SEND, must be able to access SEND IAS, regardless of sexual orientation.
Marriage and civil partnership¹⁹	Having a child with SEND can put additional strains on parental relationships, whether parents are together or separated. The SEND IAS offer will support CYP with SEND and their families, regardless of the marital status of the parents and with regard to parental responsibility.	No identified potential impacts on this group from the proposals however, this position will be monitored.	Families with a child with SEND need to know about relationship support offer in Hertfordshire. Any family with a child with or suspected to have SEND, must be able to access SEND IAS, regardless of the make-up of the family.
Parents/Carers²⁰	Details are included in all other protected characteristics.	Details are included in all other protected characteristics.	Details are included in all other protected characteristics.
Other relevant groups²¹ Consider if there is a potential impact (positive or negative) on areas such as health and	A cornerstone of the SEND IAS strategy is improving the online Local Offer (a statutory requirement). The strategy recognises that not all parents/ carers can access	Some families may not know what to search and where to search for the information they need. The vision is for a range of ways to access information: online, face to face (workshops / information events),	SEND IAS strategy includes priorities to education universal adult and children's services (libraries, Herts Help, family centres etc.) for them to help parents/ carers find the information the parents/ carers need, when they need it.

Protected characteristic group	What do you know⁷? What do people tell you⁸? Summary of data and feedback about service users and the wider community/ public <ul style="list-style-type: none"> • Who uses the service? • Who doesn't and why? • Feedback/complaints? • Any differences in outcomes? Why? 	What does this mean – what are the potential impacts of the proposal(s)⁹? - Consider positive and negative impacts - On service users / the public - <i>AND, where relevant, staff*</i> <i>* if your proposals relate mainly to a staff restructure or reorganisation, you should use the template <u>here</u></i>	What can you do¹⁰? What reasonable mitigations to reduce or avoid the impact can you propose? How will you communicate/engage or provide services differently to create a 'level playing field' – e.g. consultation materials in easy read or hold targeted engagement events <i>If there is no current way of mitigating any negative impacts, clearly state that here and consider other actions you could take in the action plan in section 4.</i>
wellbeing, crime and disorder, Armed Forces community.	the internet all of the time and it they access the internet they may use social media to search for IAS not webpages.	phone line, webchat etc. so there will be something to meet everyone's needs.	

Opportunity to advance equality of opportunity and/or foster good relations²²

To achieve the ambitions listed within the Strategy will require closer working relations with a range of stakeholders across commissioners and providers across health, education, social care and voluntary sectors, building on existing relationships across the other Transforming SEND services programme workstreams. The single helpline project lead needs to have an improved understanding of who is accessing additional support provided by the current commissioned provider needs, where possible. A robust communication plan is being drafted to achieve the mitigations to ensure those who need SEND IAS know where to access it and can do so easily.

Conclusion of your analysis and assessment - select one of the outcomes below²³ and summarise why you have selected i, ii, iii or iv; what you think the **most important** impacts are; and the key actions you will take.

OUTCOME AND NEXT STEPS	SUMMARY
<p>i. No equality impacts identified</p> <ul style="list-style-type: none">- No major change required to proposal	
<p>ii. Minimal equality impacts identified</p> <ul style="list-style-type: none">- Adverse impacts have been identified, but have been objectively justified (provided you do not unlawfully discriminate)- Ensure decision makers consider the cumulative effect of how a number of decisions impact on equality- No major change required to proposal	<p>The SEND IAS strategic intentions seek to improve information, advice and support for CYP with SEND across Hertfordshire. The strategy is not seeking to reduce/remove any of the current provision but improve access to IAS but rationalising access points by having a single telephone number, which will help families with children with SEND and potentially making it easier for parents with disabilities themselves to access the information they need in a timely way- an underlying principle of the SEND IAS strategy is to improve accessibility. The strategy will continue to have co-production at the heart.</p> <p>However, it is recognised that some families may perceive this change to be removing services for families with children with disabilities so attention to communication and working with parent led groups will be key to helping families understand the reasons for the improvements and what it will mean to them and potential future families using the services.</p>

iii. Potential equality impacts identified

- Take 'mitigating action' to change the original policy/proposal, remove barriers or better advance equality
- Set out clear actions in the action plan in section 4.

iv. Major equality impacts identified

- The adverse effects are not justified, cannot be mitigated or show unlawful discrimination
- You must stop and remove the policy
[you should consult with Legal Services]
- Ensure decision makers understand the equality impact

YOU SHOULD INCLUDE THE SUMMARY ANALYSIS ABOVE IN THE 'Equalities Implications' SECTION OF ANY REPORT(S) THAT GO TO DEPT. MANAGEMENT BOARDS / MEMBER PANELS / CABINET, AS WELL AS APPENDING A COPY OF THE EqIA

4. Prioritised Action Plan²⁴

Impact identified and group(s) affected	Action planned Include actions relating to: • mitigation measures • getting further research • getting further data/consultation	Expected outcome	Measure of success	Lead officer and timeframe
NB: These actions must now be transferred to service or business plans and monitored/reviewed to ensure they achieve the outcomes identified.				
Children and Young People with SEND	Range of ways to access IAS are available online and in the local community. These routes will be widely promoted to ensure families don't just know that information is available but how to find it.	Access to SEND IAS is rationalised and widely promoted., supported by a variety of co-production initiatives.	Families access IAS when they need it, feedback to the project team, through variety to positive engagement with projects and initiatives, including via HPCI.	Sue Chapman March 2021
Parents and Carers of CYP with SEND	Range of ways to access IAS are available online and in the local community. These routes will be widely promoted to ensure families don't just know that information is available but how to find it. This will include targeted communication to ensure families who could be considered "harder to reach" are appropriately engaged, which will include close working with practitioners across the Continuum of Need including services delivering Families First interventions as well as specialist interventions. Understand ages of children being supported via the additional	Increase understanding of needs to plan appropriate mitigations.	Positive engagement with projects and initiatives – including feedback mechanisms for experience and engagement	Sue Chapman March 2021

	<p>services provided by currently commissioned provision (e.g toy library and sleep training).</p> <p>Consultation to provide opportunities for feedback and engagement.</p>			
SEND Practitioners	Design and implement appropriate and proportionate workforce development programme,	Increase skills and confidence for practitioners to provide accurate, timely and relevant IAS to families and CYP with SEND e.g. tailored signposting to local offer webpages.	Access to SEND IAS improved.	Sue Chapman March 2021
Community Stakeholders i.e. GPs, Libraries, support groups	Design and implement appropriate and proportionate workforce development programme.	increase skills and confidence for practitioners to provide accurate, timely and relevant IAS to families and CYP with SEND e.g. tailored signposting to local offer webpages.	Access to SEND IAS improved.	Sue Chapman March 2021
Disability	The proposed changes will need to be communicated clearly and any additional needs taken in to account for example providing literature in easy-read, braille and sign language videos as appropriate. The consultation will allow families to voice their concerns and fed into proposed improvements. The local offer	Service users will understand the changes and be able to discuss any concerns which can be addressed. Training of SENDIASS staff.	Successful implementation of accessible IAS Phoneline Service.	Sue Chapman – ongoing with proposals in place by 1 st November 2020, if agreed.

	phonenumber service will also need to be able to provide a service to those who have hearing needs (either email and/or skype, text to speak)			
Race	Awareness of different languages and consideration of language line to be used in specification	Those who first language is not English are still able to access advice and guidance	Successful implementation of accessible IAS Phoneline Service.	Successful implementation of IAS Phoneline Service. Sue Chapman – ongoing with proposals in place by 1st November 2020, if agreed.

This EqIA has been signed off by:

Lead Equality Impact Assessment officer:  **Date:**

Head of Service or Business Manager: **Date: 23 March 2020**

Review date:

Please now send the completed EqIA to equalities@hertfordshire.gov.uk

Please also ensure that the EqIA is referenced in and included as an appendix to reports to Management Boards Cabinet Panels and Cabinet so that decision makers can consider equality impacts before making decisions.

Guidance end-notes

¹ The following principles explain what we must do to fulfil our duties under the Equality Act when considering the effect of existing and new policies/practices/services on equality. They must all be met or the EqIA (and any decision based on it) may be open to challenge:

- **Knowledge:** everyone working for the council must be aware of our equality duties and apply them appropriately
- **Timeliness:** the duty applies at the time of considering proposals and **before** a final decision is taken
- **Real Consideration:** the duty must be an integral and rigorous part of your decision-making and influence the process.
- **Sufficient Information:** you must assess what information you have and what is needed to give proper consideration.
- **No delegation:** the council is responsible for ensuring that anyone who provides services on our behalf can comply with the duty, are required in contracts to comply with it, and do comply in practice. It is a duty that cannot be delegated.
- **Review:** the equality duty is a continuing duty – it continues after proposals are implemented/reviewed.
- **Proper Record Keeping:** we must keep records of the process and the impacts identified.

² Our duties in the Equality Act 2010

HCC has a legal duty under this Act to show that we have identified and considered the impact and potential impact of our activities on all people with 'protected characteristics' (see end notes 11-20 for details of the nine-protected characteristics). This applies to policies, services (including commissioned services), and our employees. **If you are creating an 'arms-length' company**, seek advice from the Equality Team or Legal.

We use this template to do this and evidence our consideration. **You must give 'due regard' (pay conscious attention) to the need to:**

- **Avoid, reduce or minimise negative impact:** if you identify unlawful discrimination, including victimisation and harassment, you must stop the action and take advice immediately.
- **Promote equality of opportunity:** by
 - Removing or minimising disadvantages suffered by equality groups
 - Taking steps to meet the needs of equality groups
 - Encouraging equality groups to participate in public life or any other activity where participation is disproportionately low
 - Consider if there is a need to treat disabled people differently, including more favourable treatment where necessary
- **Foster good relations between people who share a protected characteristic and those who don't:** e.g. by promoting understanding.

³ EqIAs **should always be proportionate** to:

- The size of the service or scope of the policy/strategy
- The resources involved
- The size of the likely impact – e.g. the numbers of people affected and their vulnerability

The greater the potential adverse impact of the proposal(s) on a protected group (e.g. disabled people) and the more vulnerable the group is, the more thorough and demanding the process required by the Act will be. Unless they contain sensitive personal/employee data – EqIAs are public documents. They are published with Cabinet and Panel papers and public consultations and are available on request.

⁴ **Who completes the EqIA:** The person who is making the decision or advising the decision-maker about a policy. It is better to do this as a team, with people involved who understand the implementation of the policy.

⁵ **Title of EqIA:** This should clearly explain what service / policy / strategy / change you are assessing.

⁶ **Focus of EqIA:** A member of the public should have a good understanding of the policy or service and any proposals after reading this section. Please use plain English and write any acronyms in full first time. Also explain if there is a particular focus to your equality analysis:

- What are the main aims or purpose of the policy, practice, service or function? How does it fit with other services?
- What outcomes do you want to achieve, why and for whom? e.g. what do you want to provide, what will change/improve?
- Which aspects are most important to equality and should be the focus of your attention?
- You should state all teams/organisations involved in implementing, carrying out or delivering the policy, practice or service
- What are the **reason(s)** for the proposal or change (financial, service, legal etc)? The Act requires us to make these clear.

⁷ **Data & Information:** Your EqIA needs to be informed by data. You should consider the following:

- What data relevant to the impact on protected groups is available?
(is there an existing EqIA?, local service data, national data, community data, similar proposal in another local authority).
- What further evidence is needed and how can you get it? (e.g. further research or engagement with the affected groups).
- What do you know from service/local data about needs, access and outcomes? Focus on each characteristic in turn.
- What might any local demographic changes or trends mean for the service or function? Also consider national data if appropriate
- Does data/monitoring show that any policies or practices create particular problems or difficulties for any group(s)?
- Is the service having a positive or negative effect on particular people or groups in the community?

⁸ **What have people told you about the service, function, area?**

- Use service user feedback, complaints, audits, and/or the results of specific consultation/engagement
- Are there patterns or differences in what people from different groups tell you?
- Remember, you must engage/consult appropriately and in an inclusive way with those likely to be affected to fulfil the equality duty.
- You can read HCC's [Consultation](#) and [Engagement](#) toolkits for full advice on this
- For practical tips and advice on consulting with people from protected groups, see this ['How-to' guide](#)

⁹ **Impact:** Your EqIA must consider fully and properly **actual and potential impacts** against each protected characteristic:

- The equality duty does not stop changes, but means we must fully consider and address the anticipated impacts on people.
- Be accurate and transparent, but also realistic: don't exaggerate speculative risks and negative impacts.
- Be detailed and specific where you can so decision-makers have a concrete sense of potential effects.
- Questions to ask when assessing whether and how the proposals impact on service users, staff and the wider community:
 - Are one or more protected groups affected differently and/or disadvantaged? How, and to what extent?
 - Is there evidence of higher/lower uptake among different groups? Which, and to what extent?
 - Does the project relate to an area with known inequalities (where national evidence or previous research is available)?
 - If there are likely to be different impacts on different groups, is that consistent with the overall objective?
 - If there is negative differential impact, how can you minimise that while taking into account your overall aims?
 - Do the effects amount to unlawful discrimination? If so the plan **must** be modified.
 - Does it relate to an area where equality objectives have been set by HCC in our [Equality Strategy](#)?

¹⁰ **Consider actions relating to the following:**

- That specifically address the impacts you've identified and show how they will remove, reduce or avoid any negative impacts
- Explain clearly what any mitigating measures are, and the extent to which you think they will reduce / remove the adverse effect
- Will you need to communicate or provide services in different ways for different groups in order to create a "level playing field"?
- State how you can maximise any positive impacts or advance equality of opportunity.
- If you do not have sufficient equality information, state how you can fill the gaps.

¹¹ **Age:** People of all ages, but consider in particular children and young people, older people and carers, looked after children and young people leaving care. Also consider working age people.

¹² **Disability:** When looking at disability, consideration should be given to people with different types of impairments: physical (including mobility), learning, aural or sensory (including hearing and vision impairment), visible and non-visible impairment. Consideration should also be given to: people with HIV, people with mental health needs and people with drug and alcohol problems. People with conditions such as diabetes and cancer and some other health conditions also have protection under the Equality Act 2010.

¹³ **Gender Reassignment:** In the Act a transgender person is someone who proposes to, starts or has completed a process to change his or her gender. A person does **not** need to be under medical supervision to be protected. Consider transgender people, transsexual people and transvestites.

¹⁴ **Pregnancy and Maternity:** When looking at pregnancy and maternity, give consideration to pregnant women, breastfeeding mothers, part-time workers, women with caring responsibilities, women who are lone parents and parents on low incomes, women on maternity leave and Keeping in Touch days.

¹⁵ **Race/Ethnicity:** Apart from the common ethnic groups, consideration should also be given to Gypsy, Roma and Irish Travellers communities, people of other nationalities outside Britain who reside here, refugees and asylum seekers and speakers of other languages.

¹⁶ **Religion and Belief:** Religion includes any religion with a clear structure and belief system. As a minimum you should consider the most common religious groups (Christian, Muslim, Hindu, Jews, Sikh, Buddhist) and people with no religion or philosophical belief(s).

¹⁷ **Sex/Gender:** Consider girls and women, boys and men, married people, civil partners, part-time workers, carers (both of children with disabilities and older cares), parents (mothers and fathers), in particular lone parents and parents on low incomes.

¹⁸ **Sexual Orientation:** The Act protects bisexual, heterosexual, gay and lesbian people.

¹⁹ **Marriage and Civil Partnership:** consider married people and civil partners – e.g. do same sex couple in a civil partnership have the same rights and benefits as married people?

²⁰ **Carers:** From April 2015, carers (people who provide unpaid care to a friend or relative) have been entitled to an assessment of their own needs in the same way as those they care for. Although not a 'protected characteristic' HCC Diversity Board has agreed that the impact of proposals on carers should also be considered.

²¹ **Other relevant groups:** You should consider the impact on our service users in other related areas, such as health and wellbeing, crime and disorder (e.g. people experiencing domestic abuse), community relations and socio-economic status (e.g. homelessness or low incomes). If the proposal is likely to have an impact on service users in these areas, HCC Public Health and the County Community Safety Unit may be able to help. Also consider whether your policy

or decision will impact current or former Armed Forces personnel living and working in Hertfordshire. The Council is committed to the Hertfordshire Community Covenant, a commitment from public and private organisations in the county to support the active and retired Armed Forces community.

²² **Equality of opportunity and good relations:** summarise anything that will have a potential positive impact over and above the work of your project – e.g. engaging with the community may help raise awareness and community understanding of the needs of certain groups.

²³ **Conclusion**

- Make a frank and realistic assessment of the overall extent to which the negative impacts can be reduced or avoided by the mitigating measures. Also explain what positive impacts will result from the actions and how you can make the most of these.
- Make it clear if a change is needed to the proposal itself. Is further engagement, research or monitoring needed?
- Make it clear if, as a result of the analysis, the policy/proposal should be stopped.

²⁴ **Action Planning:** The Equality Duty is an ongoing duty: policies must be kept under review, continuing to give ‘due regard’ to the duty. If an assessment of a broad proposal leads to more specific proposals, then further equality assessment and consultation are needed.