EQIA Submission – ID Number Section A

EQIA Title

Accommodation and Support Pathway/ Supported Accommodation

Responsible Officer

Caroline Smith - CY SCS

Type of Activity

Service Change

No

Service Redesign

Service Redesign

Project/Programme

No

Commissioning/Procurement

Commissioning/Procurement

Strategy/Policy

No

Details of other Service Activity

No

Accountability and Responsibility

Directorate

Children Young People and Education

Responsible Service

Integrated Children's Services

Responsible Head of Service

Christy Holden - CED SC

Responsible Director

Kevin Kasaven - CY SCS

Aims and Objectives

Kent County Council currently purchase two separate services; the Accommodation Service for Older Children in Care and Care Leavers Aged 16-21 (known as 'Shared Accommodation') and the Young People Supported Accommodation and Floating Support (YPSAFS) service. These services are delivered by different organisations on behalf of KCC. The contracts for both services are due to end on the 31 March 2024.

KCC is redesigning and aligning the accommodation and support pathway for Care Leavers, Children in Care and Children in Need 16- and 17-year-olds in line with the new regulation standards as introduced by Ofsted from 28 April 2023. This includes purchasing a good range of stable, safe, and well-maintained accommodation and support services that are flexible to meet individual and changing demands. The specifications for the proposed new services were developed with stakeholders.

The aim of the activity is to commission adequate accommodation ensuring equal access to all eligible children and young adults and that there are no restrictions based on protected characteristics. The process included stakeholder engagement including consultation with children and young adults, to produce a new operating model for a Supported Accommodation service that includes Ofsted's regulatory standards prior to going out to procurement.

Section B – Evidence

Do you have data related to the protected groups of the people impacted by this activity?

Yes

It is possible to get the data in a timely and cost effective way?

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Is there national evidence/data that you can use?

Yes

Have you consulted with stakeholders?

Yes

Who have you involved, consulted and engaged with?

Children and Young Adults (service users)

Staff (service providers)

Support Staff (service providers)

KCC Staff (internal)

District and Borough Staff – (Housing Options Team, Kent Housing Options Group)

Kent Police

Interested parties have had an opportunity to give feedback on the proposed changes on the age a young adult moves on into independent accommodation, changing from 21 to 19 years.

Has there been a previous Equality Analysis (EQIA) in the last 3 years?

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Do you have evidence that can help you understand the potential impact of your activity?

Yes

Section C – Impact

Who may be impacted by the activity?

Service Users/clients

Service users/clients

Staff

Staff/Volunteers

Residents/Communities/Citizens

Residents/communities/citizens

Are there any positive impacts for all or any of the protected groups as a result of the activity that you are doing?

Yes

Details of Positive Impacts

The development of a Supported Accommodation service through the recommissioning of both the Shared Accommodation service and YPSAFS service by a joint procurement will offer the opportunity to build on lessons learnt from the previous contracts and improve the overall service offering.

The regulation by Ofsted of supported accommodation for all 16/17 years old through the introduction of four quality standards, will also help to improve overall the service offered.

Young adults will benefit from an improved service that offers a defined step-down pathway. The aim of the activity is to enable children and young adults to access and to maintain their own home by achieving independence.

The recommissioning of Shared Accommodation and YPSAFS Service will ensure that we shape the service for the wants and needs of children and young adults with a focus on long term impact and achieving positive outcomes whilst also ensuring that resources are used effectively across the whole service pathway.

Negative impacts and Mitigating Actions

19. Negative Impacts and Mitigating actions for Age

Are there negative impacts for age?

Yes

Details of negative impacts for Age

This commissioning exercise will affect 16–25-year-olds Children in Care and Care Leavers as well as 16-17 Children in Need. Any changes will apply to these cohorts only.

The proposed service model has a reduction in the age that a young adult moves on into independent accommodation which will impact negatively on those aged 19 and over.

There are currently 332 young adults (53%) over 19 within Shared Accommodation, and 45 young adults in YPSAFS (32%).

The Shared Accommodation service predominantly accommodates UAS children new arrivals, as well as accommodating citizen 16/17-year-old Children in Care and 18+ citizen Care Leavers. Current ratio is 90% non-citizen, 10% citizen.

The number of 16/17 year olds has decreased from 107 (March 2021) to 75 (March 2022) due to the implementation of the National Transfer Scheme.

The majority of 18+ young adults are former UAS children that have aged through this provision. The expectation is that these will be moved on into alternative accommodation.

The new service will include the delivery of transitional outreach support for new placements in response to feedback from practitioners and young adults. This will have a positive impact as young adults are supported in developing their independent living skills and settling within the local community.

Mitigating Actions for Age

We are recommending a transitional year for those aged 18 from any legacy placements, to mitigate the reduction in age. For any new referrals, there will be a period of transition for a young adult to gain independent living skills to enable them to move into their own accommodation at 19. This is in line with our aspirations as detailed within the Sufficiency Strategy.

We will continue to monitor service delivery to ensure we understand any cumulative impact on those affected by the change of age that a young adult is expected to move on into independent accommodation.

All non-eligible former Children in Need young adults will be signposted to Adult services and the District Borough Councils. The expectation is that they will be supported to find alternative housing rather than Social Housing.

We will ensure practitioners are making young adults aware of their housing options and the expectation around move on.

We will ensure EQIA is shared.

Responsible Officer for Mitigating Actions – Age

Caroline Smith

20. Negative impacts and Mitigating actions for Disability

Are there negative impacts for Disability?

Yes

Details of Negative Impacts for Disability

Several of the properties in the current YPSAFS service do not offer disabled access.

Mitigating actions for Disability

Include a requirement to provide accommodation to support a range of needs within the new model. Share Eq.A.

Responsible Officer for Disability

Caroline Smith

21. Negative Impacts and Mitigating actions for Sex

Are there negative impacts for Sex

No. Note: If Question 21a is "No", Questions 21b,c,d will state "Not Applicable" when submission goes for approval

Details of negative impacts for Sex

Not Completed

Mitigating actions for Sex

Not Completed

Responsible Officer for Sex

Not Completed

22. Negative Impacts and Mitigating actions for Gender identity/transgender

Are there negative impacts for Gender identity/transgender

Yes - Add details of the negative impacts and mitigations.

Negative impacts for Gender identity/transgender

Although current services do not adversely impact on gender identity/transgender, this could be improved upon. Where a young adult identifies as transgender the young adult would be equally entitled and supported to access the service. All operational staff will be expected to provide a service to meet the needs of all individuals. Any needs regarding the gender identity of the young adult will be identified through care planning and placement matching processes.

Mitigating actions for Gender identity/transgender

Ensure EqIA is shared.

As part of the specification, there will be a requirement to provide accommodation to support a range of needs within the new model.

Responsible Officer for mitigating actions for Gender identity/transgender

Caroline Smith

23. Negative impacts and Mitigating actions for Race

Are there negative impacts for Race

Yes - Add details of the negative impacts and mitigations.

Negative impacts for Race

Most young adults of Transitional Accommodation for 18-year-olds UAS children/Asylum Care Leavers:

UAS children/Asylum Care Leavers - 499 (90%)

Citizen - 57 (10%)

Most young adults do not speak English as their first language.

Location of some properties across Kent for both services fall into areas known to be xenophobic which can result in emotional / physical harm to young adults.

Mitigating actions for Race

Ensure that young adults are placed in areas where they can access community services safely.

Social Workers and Personal Advisors will consider the challenges whilst considering race/nationality when

completing referrals to the service and will ensure their protected characteristics are not compromised in any way.

Responsible Officer for mitigating actions for Race

Caroline Smith

24. Negative impacts and Mitigating actions for Religion and belief

Are there negative impacts for Religion and belief

Yes - Add details of the negative impacts and mitigations.

Negative impacts for Religion and belief

Size of premises does not allow for in house prayer rooms/religious facilities. Properties are shared and may not be exclusive to any one religion.

Mitigating actions for Religion and belief

Ensure premises and placements are located within reasonable distance to religious facilities.

Social Workers and Personal Advisors will understand the challenges faced by this group when completing their referrals and will ensure their protected characteristics are not compromised in anyway, as well as providing information to their young adults about available services.

Any needs regarding the religion and beliefs of the young adult will be identified through care planning and placement matching processes.

Responsible Officer for mitigating actions for Religion and Belief

Caroline Smith

25. Negative impacts and Mitigating actions for Sexual Orientation

Are there negative impacts for Sexual Orientation

No. Note: If Question 25a is "No", Questions 25b,c,d will state "Not Applicable" when submission goes for approval

Negative impacts for Sexual Orientation

Not Completed

Mitigating actions for Sexual Orientation

Not Completed

Responsible Officer for mitigating actions for Sexual Orientation

Not Completed

26. Negative impacts and Mitigating actions for Pregnancy and Maternity

Are there negative impacts for Pregnancy and Maternity

Yes - Add details of the negative impacts and mitigations.

Negative impacts for Pregnancy and Maternity

Size of accommodation available service does not always allow for appropriate space required by Parents and Child.

Partners are often not able to stay with the parent due to house rules/ size of accommodation/ previous history.

The Service does not adversely impact on pregnancy and maternity; however, health assessments are completed on all children up to the age of 18 on a yearly basis. Those identified as pregnant will be identified and any additional support accessed.

Mitigating actions for Pregnancy and Maternity

Ensure accommodation allows for dedicated Parent and Child per area for Supported Accommodation

Where matching issues are established due to offences other housing options are considered.

Engage with current parents in stakeholder engagement with a view to involving partners more actively in childcare including overnight care.

Engage with current and potential providers to encourage service locations closer to affordable childcare where possible.

Responsible Officer for mitigating actions for Pregnancy and Maternity

Caroline Smith

27. Negative impacts and Mitigating actions for Marriage and Civil Partnerships

Are there negative impacts for Marriage and Civil Partnerships

Yes - Add details of the negative impacts and mitigations.

Negative impacts for Marriage and Civil Partnerships

Partners are not currently allowed to stay permanently overnight in the accommodation. Rooms are not of sufficient size to allow this regularly

Mitigating actions for Marriage and Civil Partnerships

Support will be provided to sign post young adults onto accommodation that will allow partners to stay more often/permanently.

If both young adults meet the eligibility criteria, support and accommodation will be provided but with a view to supporting young adults in finding more suitable accommodation.

Responsible Officer for Marriage and Civil Partnerships

Caroline Smith

28. Negative impacts and Mitigating actions for Carer's responsibilities

Are there negative impacts for Carer's responsibilities

No. Note: If Question 28a is "No", Questions 28b,c,d will state "Not Applicable" when submission goes for approval

Negative impacts for Carer's responsibilities

Not Completed

Mitigating actions for Carer's responsibilities

Not Completed

Responsible Officer for Carer's responsibilities

Not Completed