

# **EQIA Submission Draft Working Template**

If required, this template is for use prior to completing your EQIA Submission in the EQIA App. You can use it to understand what information is needed beforehand to complete an EQIA submission online, and also as a way to collaborate with others who may be involved with the EQIA.

Note: You can upload this into the App when complete if it contains more detailed information than the App asks for and you wish to retain this detail.

Section A	
1. Name of Activity (EQIA Title):	Commissioned Youth Services
2. Directorate	Children, Young People and Education
3. Responsible Service/Division	Integrated Children's Services
Accountability and Re	esponsibility
4. Officer completing	
EQIA	Desialla Day

5. Head of Service	
EQIA onto the App.	
will be submitting the	
name of the officer who	Programme Manager – Family Hubs
Note: This should be the	Danielle Day
LQIA	

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Note: This should be the	Ca
Head of Service who will	Di
be approving your	וט
submitted EQIA.	

Carolann James

Director of Operational Integrated Children's Services

6. Director of Service

Note: This should be the name of your responsible director. Carolann James

Director of Operational Integrated Children's Services

# The type of Activity you are undertaking

# 7. What type of activity are you undertaking?

Tick if Yes	Activity Type		
Yes	<b>Service Change</b> – operational changes in the way we deliver the service to people.		
Yes	Service Redesign – restructure, new operating model or changes to ways of working		
Yes	<b>Project/Programme</b> – includes limited delivery of change activity, including partnership		
res	projects, external funding projects and capital projects.		
Yes	Commissioning/Procurement – means commissioning activity which requires		
	commercial judgement.		
Yes	Strategy / Policy – includes review, refresh or creating a new document		
	Other – Please add details of any other activity type here.		

**8.** Aims and Objectives and Equality Recommendations — Note: You will be asked to give a brief description of the aims and objectives of your activity in this section of the App, along with the Equality recommendations. You may use this section to also add any context you feel may be required.

**Equality Impact Assessment (EQIA)** 

This EQIA is intended to assess the potential impact of our decisions on persons with different protected characteristics. In particular, this EQIA has been prepared to help us to have regard to the need to: (i) eliminate discrimination; (ii) advance equality of opportunity; and (iii) foster good relations between persons who share a relevant protected characteristic and those who do not, in the exercise of our public functions. These issues are relevant considerations to be taken into account whenever a new policy, function, or system change is being proposed in the exercise of our public functions. This EQIA is also intended to evidence that these considerations have in fact been taken into account, and the weight given to them as part of our decision-making process.

#### Proposals under consideration and case for change

The existing contracts for the commissioned Youth Services are due to expire at the end of March 2024. A decision on the future service provision and spend is required.

The cost of the current Youth Service contracts is £1.2m, the savings made by not continuing to commission these services would be £913k from the base budget. The remainder c£321k of the funding is currently utilising the Dedicated Schools Grant (DSG) and this would enable a further reduction to the current DSG overspend.

In accordance with Securing Kent's Future, it is necessary for all services to review future spend, in particular where contracts are reaching end points. In addition, the development of a whole family 0-19 delivery model (Family Hub) at the same time offers the Council an opportunity to refresh KCC's current offer in Youth Service provision without the commissioned activity previously put in place through these contracts.

If the decision is made to not renew commissioned Youth Services contracts, the following contracts will end:

	District	
Canterbury Academy	Ashford	
Canterbury Academy	Canterbury	
Play Place	Dartford	
Pie Factory	Dover	
Salus	Folkestone & Hythe	
The Grand	Gravesham	
Salus	Maidstone	
West Kent Extra	Sevenoaks	
Southern (used to be opitivo)	Swale	
Pie Factory	Thanet	
Salus	Ton & Malling	
Salus	Tunbridge Wells	
	Totals	

The commissioned services offer the following activities:

Activities and clubs that may stop are set out as follows:

#### Ashford district - activity provider: The Canterbury Academy

- Tenterden Highbury Hall youth sessions and Skate Project
- Ashford Stanhope Girls netball
- Ashford John Wallis Boxing, Tennis and basketball, British Sign Language

- Ashford Sk8side Girls Skate project and other activities
- Detached community work Bockhanger and McDonalds

# Canterbury district - activity provider: The Canterbury Academy

- Pyuxis (Sun and Mon)
- Riverside Youth session (Wed), Neuro diverse group (Thurs) and volunteer group (Tues)
- Spring Lane Youth club (Tues, Wed & Thurs)
- Canterbury bike project (not solely funded by KCC, so may not be impacted)
- Detached community work City Centre, Sturry Road, Wincheap, Thanington, Hales Place and Westgate (Thurs – rotates around various locations)

#### Dartford district - activity provider: Play Place

- Bean Recreation Ground Juniors (Tues)
- Darenth Hillrise Park Seniors (Tues)
- Stone Stone Baptist Church Junior and Seniors youth clubs (Weds)
- Homework Heroes Seniors (Weds and Thurs)
- Stone Recreation Ground Juniors (Thurs)
- Stone Pavilion Junior and Senior youth club (Fri)
- Knockhall Greenhithe Community Centre Junior Club (Thurs) Temple Hill Playground Mixed age

#### Dover district - activity provider: Pie Factory

- Aylesham Junior youth club, Senior youth club (Tues)
- Biggin Hall Youth session (Wed)
- Linwood Youth Hub session (Thurs)
- Astor School Youth session (Thurs)

### Folkestone and Hythe district - activity provider: Salus

- Hythe Youth Centre Juniors (Mon) Senior club (Weds) Junior club (Fri) Shepway Autism Support Group - All age (Fri)
- New Romney Phase 2 Junior club (Thurs)
- Detached work Various District wide
- Safety in Action Local schools District wide
- D of E (Duke of Edinburgh) Awards
- Residential Junior and Senior Leaders courses

#### Gravesham district - activity provider: The Grand

- Gravesend Youth Job Club (Mon), GYG Gone Wild (Mon), Mini GYGers (Tues),
   GYG Glam (Tues and Wed), GYG Performers (Wed), GYG Creative (Wed), Higham Youth
   Club (Wed), GYG Committee (Thurs), Active Listening Service
- Cobham Youth Club Friday

### Maidstone district - activity provider: Salus

- Sutton Valence Village Hall Junior youth club (Mon)
- Shepway Youth and Community Centre Junior club and Senior Youth club (Tues) Junior club and Senior club (Fri) Olympia Boxing (Fri) one to one and small group work sessions
- Parkwood Youth Centre Junior club and Senior club (Thurs)

• Signs of Safety - District wide annual activity to focus on transition from Primary to Secondary education

## Sevenoaks district – activity provider: West Kent Extra

- Sevenoaks The Hope Church, Youth Group (Tues)
- Swanley The Junction, St Marys Road Youth Group (Fri) and Nurture Group (Tues)
- West Kingsdown Youth Group (Wed)
- Edenbridge Eden Centre youth group, House (Tues, Wed & Fri), 8-12s session, Olympia Boxing (Thurs) and Nurture Group (Thurs)
- Dunton Green Pavilion (Mon)
- Westerham Youth session (Fri), Olympia Boxing (Wed)

# Swale district – activity provider: Southern Housing

- Faversham Baptist Church Disability Youth Club (Mon)
- Sheerness Healthy Living Centre Absolute Arts youth club (Mon)
- Newington Youth club (Tues)
- Sheerness County Youth Centre Sheerness Seniors Youth Club (Tues)
- Rushenden Youth club (Wed)
- Thistle Hill Detached provision (Wed)
- Faversham Baptist Church 812 youth club (Thurs)
- Sheerness Youth Centre Youth club (Thurs)
- Teynham Detached provision (Thurs)
- Faversham Recreation Ground Detached (Fri)
- Swale School work (various)

# Thanet district - activity provider: Pie Factory

- Ramsgate Youth Centre Bike Project (Mon), The Live Room (Mon), ACT! Youth Volunteer Group (Tues), Band Room (Tues), Junior youth club (Thurs), Open Arms (Fri)
- The Pavilion Youth & Community Café Youth café sessions (Tues, Thurs and Fri)
- Parent and Child group (Wed, all age)
- Detached Community work Streets based in Ramsgate (Fri)

#### Tonbridge and Malling district – activity provider: Salus

- Ditton Junior youth club and Senior youth club (Mon)
- Snodland Junior youth club and Senior youth club (Wed)
- East Malling / Larkfield Junior youth club and Senior youth club (Thurs)
- Detached sessions in Larkfield Larkfield skate park and other locations when required
- Signs of Safety District wide annual activity to focus on transition from Primary to Secondary education

#### Tunbridge Wells district – activity provider: Salus

- Paddock Wood Junior youth club and outreach (Mon)
- Rusthall Detached sessions (Tues)
- Langton Green youth club (Tues)
- Cranbrook Junior and Senior mixed youth club and outreach (Thurs)
- Sherwood Detached sessions
- Safety in Action annual activity for year 6 students to focus on the transition from primary to secondary school

This policy change for Kent would include substantial savings and would rebase our existing Open Access & Youth inhouse services to deliver the provision for children and families 0 to 19. The proposal is to not renew existing youth commissioned contracts when they end in March 2024 enabling a savings to the Council of £913K. The analysis from the available evidence suggests that the development and implementation of Family Hubs in Kent may have impacts for some protected characteristic groups due to the mixed client base.

# **Section B – Evidence**

Note: For questions 9, 10 & 11 at least one of these must be a 'Yes'. You can continuing working on the EQIA in the App, but you will not be able to submit it for approval without this information.

EQIA in the App, but you will	EQIA in the App, but you will not be able to submit it for approval without this information.			
9. Do you have data related to the protected groups of the people impacted by this activity?  Answer: Yes/No	Yes			
10. Is it possible to get the data in a timely and cost effective way?  Answer: Yes/No	Yes			
11. Is there national evidence/data that you can use?  Answer: Yes/No	Yes			
12. Have you consulted with Stakeholders?  Answer: Yes/No Stakeholders are those who have a stake or interest in your project which could be residents, service users, staff, members, statutory and other organisations, VCSE partners etc.	Yes			

#### 13. Who have you involved, consulted and engaged with?

Please give details in the box provided. This may be details of those you have already involved, consulted and engaged with or who you intend to do so with in the future. If the answer to question 12 is 'No', please explain why.

Initial informal engagement took place between January and August 2022 with staff, service users and partners to explore the themes and aims of a Family Hub model in Kent, to inform the proposals and the application for the Family Hub Grant Funding in August 2022. Colleagues from across Integrated Children's Services have spoken with KCC staff, health visitor and midwifery colleagues, other public health colleagues, commissioners and the Voluntary and Community Sector (VCS).

The Family Hub services public consultation launched on 19 July 2023 and closed on the on 13 September. The proposal to cease commissioned youth contracts was included within the consultation. There was a separate section in the consultation document which outlined the proposals district by district and the questionnaire provided opportunity for young people, parents/carers and professionals to feedback specifically on identified services, and generally.

In addition to the formal consultation questionnaire (which could be completed online or as a physical form) families and young people were encouraged and supported by youth services to respond informally if they preferred to. To this end young people were able to send emails, other written communication, videos, voice notes and photos, and flip charts from youth sessions.

The feedback from the consultation described the difference stopping commissioned youth activities would make to service users, and has informed the equalities impact analysis and modelling. By way of a summary, the main themes of feedback as it related to the cessation of the Youth Service contracts are included here.

When the question was put to residents, just under a third of consultees (31%) stressed the personal need for these activities and 17% indicated that they rely on these services. Just over a quarter (27%) believe it will result in them missing out on socialising/mixing/building confidence in making friends. Other comments highlight that the removal of these activities would be detrimental to children/young people that use them and have a negative impact and affect mental health/wellbeing/anxiety/feelings of isolation.

When the question was put to professional/organisational consultees, they expressed concerns that increasing numbers of young people need to access support and stopping services is the opposite of what is needed. In addition, consultees reference the potential implications of this in terms of mental health and safety concerns. Consultees also expressed concerns that these activities provide much needed services for 'hard to engage' young people/adolescents and that they may not interact with other service provisions.

Having considered all factors including these responses, KCC's preferred course of action remains to cease the commissioned Youth Service contracts at the end of March 2024, analysed below as Option 1.

Whilst KCC acknowledges the value of the work carried out by commissioned Youth Services for the duration of the current contracts, reflected in the consultation responses, the extent of the financial challenge the Council now faces has led to difficult decisions being necessary. The implication of continuing with the Youth Service contracts delivering discretionary services beyond March 2024 would be a requirement to make greater cuts in other parts of the Council's CYPE budget, which could require making cuts elsewhere.

14. Has there been a previous equality analysis (EQIA) in the last 3 years?  Answer: Yes/No	Yes
15. Do you have evidence/data that can help you understand the potential impact of your activity?  Answer: Yes/No	Yes

Uploading				
Evidence/Data/rel	ated			
information into th	ne App			
Note: At this point,	you			
will be asked to up	load			
the evidence/data	and			
related information	n that			
you feel should sit				
alongside the EQIA	that			
can help understan	d the			
potential impact of	your			
activity. Please ens	ure			
that you have this				
information to uplo	oad as			
the Equality analys	is			
cannot be sent for				
approval without to	his.			
Section C – Imp	pact			
16. Who may be in	npacte	d by the activity? Select a	ll that apply.	
Service	Yes	Residents/Communities,	/Citizens	Yes
users/clients		Answer: Yes/No		
Answer: Yes/No				
Staff/Volunteers	Yes			
Answer: Yes/No				
17. Are there any p	ositive	e impacts for all or any	Yes	
of the protected gr	roups a	s a result of the		
activity that you ar	re doin	g? Answer: Yes/No		
18. Please give det	ails of	Positive Impacts		
The proposal to so	360 665	amissianad vauth samissa	c contracts will not ro	sult in any positive imposts for

The proposal to cease commissioned youth services contracts will not result in any positive impacts for services users, staff or residents. However, the Family Hub 0-19 years (to 25 years for SEND) model will offer a youth offer within a whole family approach.

# **Negative Impacts and Mitigating Actions**

The questions in this section help to think through positive and negative impacts for people affected by your activity. Please use the Evidence you have referred to in Section B and explain the data as part of your answer.

# 19. Negative Impacts and Mitigating actions for Age

a)	Are there negative	Yes
	impacts for age?	
	Answer: Yes/No	
	(If yes, please also	
	complete sections b,	
	c,and d).	
b)	<b>Details of Negative</b>	Young people accessing commissioned youth services aged 8-19 years are
	Impacts for Age	likely to be disproportionately impacted by the proposal to cease
		Commissioned Youth Services. The activities are part of their wider social,
		physical and emotional development extra-curricular activities.

9,747 young people aged 8yrs+ have accessed commissioned youth services so far this year across Kent, and these young people could be impacted by the decision to cease contracts. Data shows the reach (the number of individuals who have attended at least one session) for BOTH commissioned and KCC youth services has increased year on year from 8681 in 2021, to 12,365 in 2022 to 13,869 in (Jan to 10th Oct) 2023. Reach 2021 2022 2023 Commissioned 6,881 8,633 9.747 youth services KCC youth 1,800 3,732 4122 services Children and young people aged between 8-19 years are more likely to be impacted by the cessation of commissioned youth contracts, as alternative provision will have a cost attached and therefore may impact some young people's ability to participate. Within the Family Hub model, KCC will continue with in-house youth provision. It would remain a mix of activity at KCC centres and outreach locations. We also recognise there are a wide range of youth activities already available in communities e.g. local sports clubs. **Mitigating Actions for** There is a range of community-based youth activities which can be accessed by young people. These include activities at afterschool clubs, age leisure centres, grass roots sports clubs, youth activities provided by groups such as Scouts and Brownies, or faith groups. In order to address the concerns expressed within the consultation responses insofar as is possible, if commissioned youth services are not renewed it will be important for us to work with young people and former contracted providers to identify and signpost appropriate services that they will be able to access through in-house youth provision and any other local services (e.g. in the voluntary sector), via a directory of youth services. This will be provided through half yearly updates and will be managed centrally. d) Responsible Officer Danielle Day for Mitigating Actions Programme Manager – Family Hubs - Age 20. Negative Impacts and Mitigating actions for Disability a) Are there negative Yes impacts for Disability? Answer: Yes/No (If yes, please also complete sections b, c, and d).

# b) Details of Negative Impacts for Disability

For the purposes of this EQIA the disability data includes those young people with an EHCP and SEN Support.

Face to Face delivery

According to the most recent service user data, there were around 915 services users with Special Educational Needs (EHCP or SEN Support) accessing Commissioned Youth Services from 2021 to 2023 (Jan to 10th Oct) who may be more adversely affected by the proposals than those without disabilities.

Commissioned providers currently offer the following services specific to individuals with disabilities:

- Ashford, British Sign Language (BSL)
- Canterbury, Neurodiverse Group
- Folkestone & Hythe, Shepway Autism Support Group
- Swale, Disability Youth Club

If these support services are ceased, this will have a negative impact. KCC's in-house youth service will continue to offer support. As BSL is a specialist area, we would need to consider how support continues to be offered.

Reach	2021	2022	2023
Commissioned	247	389	315
youth services			
KCC youth	280	247	208
services			

The proposed ceasing of Commissioned Youth Services may adversely affect young people with SEND if they do not feel they can or wish to access other youth activities. This may be due to a change in the service type, location or even different participants or facilitators in groups that they may find distressing or difficult to manage.

Given that educational, employment, and wellbeing outcomes are all generally lower for those with disabilities, (Outcomes for disabled people in the UK – Office for National Statistics (ons.gov.uk)) this proposal may be compounded by increased difficulty accessing services, resulting in a disproportionate impact.

36 responders (7%) felt that the proposals will affect those with SEN/SEND/ND/Autism. 21 responders (4%) felt that the proposals may detrimentally affect those who are vulnerable/disabled.

Parent/carers responders described how their children with SEND benefited from the social experiences and increased their confidence by attending youth groups.

#### **Digital and Virtual Delivery**

		Parents/carers and children with disabilities may be unable to access information digitally. ONS research suggests that half of internet nonusers in 2017 has a disability and are disproportionately affected by digital exclusion. Exploring the UK's digital divide — Office for National Statistics (ons.gov.uk). As such they may be more reliant on face-to-face services as they may not be able to access the digital offer.
c)	Mitigating Actions for Disability	Annual review of statutory youth offer to identify need and design an offer informed by local data and service user feedback/co-design.  To ensure we continue to support young people with SEND to access youth activities there will need to be face to face targeted groups in each district to minimise impact on impacted young people with SEND.
		Evidence from the consultation tells us that families prefer virtual services on some occasions. This may be the case where a young person is experiencing anxiety in meeting people or going out to new groups. To this end we will also ensure that there is some virtual delivery of services.
		[ In order to address the concerns expressed within the consultation responses insofar as is possible, if commissioned youth services are not renewed it will be important for us to work with young people and former contracted providers to identify and signpost appropriate services that they will be able to access through in-house youth provision and any other local services (e.g. in the voluntary sector), via a directory of youth services. This will be provided through half yearly updates and will be managed centrally.
		There are some existing groups available to those with disabilities, and to ensure consistency, we will deliver groups in partnership where this is beneficial to service users on a county wide basis. KCC will continue to strengthen the in-house youth provision to support those with SEND, working alongside partners.
d)	Responsible Officer for Mitigating Actions - Disability	Danielle Day Programme Manager – Family Hubs
a)	Are there negative impacts for Sex?  Answer: Yes/No (If yes, please also complete sections b, c, and d).	Yes
b)	Details of Negative Impacts for Sex	Generally commissioned youth services reach slightly more males than females.
		There is district variation in the data which means that the impact on sex of ceasing youth contracts will vary by district. Of particular note is Gravesham where the CYH The Gr@nd Youth Club this year to date has had a very high reach of females, 1055.

Reach	2021	2022	2023			
	male	female	male	female	male	female
Commissioned youth services	3,379	3,243	4,563	3,870	4,684	5,024
KCC youth services	1,150	1,017	2,440	1,990	2,626	2,257

In Gravesham females would be negatively impacted by the ceasing of commissioned youth contract as The Gr@nd has a very high reach of females in the year to date 2023. This may be due to the nature of the offer provided by The Gr@nd being very music and performing arts orientated being more attractive to females.

Commissioned providers in Ashford currently offer girls netball and a girls skate project.

# c) Mitigating Actions for Sex

There is a range of universal community-based youth activities which can be accessed by young people of both sexes. These include activities at afterschool clubs, leisure centres, grass roots sports clubs, youth activities provided by groups such as Scouts and Brownies, or faith groups.

However, some of these will be chargeable activities and therefore may impact some young people's ability to participate.

Annual review of statutory youth offer to identify need and design an offer informed by local data and service user feedback/co-design.

Within the Family Hub Network work needs to be completed to identify gaps in provision and support community and voluntary groups to deliver a universal youth offer that delivers opportunities and meets need for young people of both sexes.

Where appropriate and informed by needs data, Family Hubs may run targeted groups for young people such as girls groups (for those vulnerable or at risk of sexual exploitation) or other targeted groups which may have a positive/deliberate gender bias around need.

In order to address the concerns expressed within the consultation responses insofar as is possible, if commissioned youth services are not renewed it will be important for us to work with young people and former contracted providers to identify and signpost appropriate services that they will be able to access through inhouse youth provision and any other local services (e.g. in the voluntary sector), via a directory of youth services. This will be provided through half yearly updates and will be managed centrally.

If these support services are ceased, this will have a negative impact. KCC will seek to support identification of girl specific activities and deliver those where required, but these may not be a like for like, eg. Netball.

d)	Responsible Officer	Danielle Day
ω,	for Mitigating Actions	Programme Manager – Family Hubs
	- Sex	ç ,
22.	Negative Impacts and N	Nitigating actions for Gender identity/transgender
a)	Are there negative	Yes
	impacts for Gender	
	identity/transgender?	
	Answer: Yes/No (If	
	yes, please also	
	complete sections b,	
<b>b</b> \	c,and d).	Conder data contures numbers of voung needle reached for whom
b)	Details of Negative Impacts for Gender	Gender data captures numbers of young people reached for whom gender is recorded as 'unknown' but we do not know if this is because this
	identity/transgender	information has not been recorded or because it reflects how young
	identity, transferider	people identify.
		people identify.
		There are currently no specific groups delivered by Commissioned youth
		services that are specifically for targeted gender identity young people.
c)	Mitigating actions for	There is a range of universal community-based youth activities which can
	Gender	be accessed by young people regardless of their gender identity. These
	identity/transgender	include activities at afterschool clubs, leisure centres, grass roots sports
		clubs, youth activities provided by groups such as Scouts and Brownies, or
		faith groups.
		However, some of these will be chargeable activities and therefore may
		impact some young people's ability to participate.
		, , , , , , ,
		Annual review of statutory youth offer to identify need and design an
		offer informed by local data and service user feedback/co-design.
		Within the Family Hub Network work needs to be completed to identify
		gaps in provision and support community and voluntary groups to deliver
		a universal youth offer that delivers opportunities and meets need for
		young people who are transgender or have a different gender identity to their sex at birth.
		then sex at birth.
		Where appropriate and informed by needs data, Family Hubs may run
		targeted groups for young people who are transgender or identify as a
		different gender to their sex at birth.
		In order to address the concerns expressed within the consultation
		responses insofar as is possible, if commissioned youth services are
		not renewed it will be important for us to work with young people
		and former contracted providers to identify and signpost
		appropriate services that they will be able to access through in-
		house youth provision and any other local services (e.g. in the
		voluntary sector), via a directory of youth services. This will be
		provided through half yearly updates and will be managed centrally.
-11	Danier del CCC	Daviella Dav
d)	Responsible Officer for Mitigating Actions	Danielle Day Programme Manager – Family Hubs
	ioi wiitigatilig Actions	Flogianine Manager — Family Hubs

	- Gender	
	identity/transgender	
		Nitigating actions for Race
a)	Are there negative impacts for Race?  Answer: Yes/No (If yes, please also complete sections b, c, and d).	Yes
b)	Details of Negative	The data for ethnicity reach is largely uncategorised so meaningful
	Impacts for Race	analysis/comparison with district population data is difficult as the numbers are very low. However there are district variations which show that ceasing commissioned youth services would have a negative impact for race.  In particular for 2023 year to date:  - Dartford commissioned youth reach more Black African young people (21), Black British (10), Indian (17), other mixed background (10) than KCC youth services (11, 3, 4 and 4 respectively)  - Canterbury commissioned youth reach more other Asian background (9) and white and black Caribbean (10) compared to KCC youth services (0 and 1 respectively)  - Dover commissioned youth reach Gypsy/Roma or Irish Traveller (12), whereas KCC youth services reach (1)  - Gravesham commissioned youth/KCC reach Black African (99, 3), Black British (13, 3), Black Caribbean (8, 1), Indian (67, 12), Other (23, 6), Other Asian Background (20, 6), Other black background (13, 3), Other mixed background (34, 7), Other white background (98, 21), Pakistani (12, 4).  - Maidstone commissioned youth/KCC youth reach Gypsy, Roma or Irish Traveller (19, 5), White and Black Caribbean (18, 8)  - Thanet commissioned youth/KCC offer reach Black African (11, 4), Other Mixed background (17, 4)  - Tonbridge and Malling commissioned/KCC youth reach Black African (9,0)  - Tunbridge Wells commissioned/KCC youth reach Chinese (6, 1)  Consultation respondees themes did not identify ethnic populations as an impacted area from the Equality analysis.  People whose first language is not English are more likely to be digitally excluded and may not be able to access an enhanced digital offer. They may also not access traditional marketing activity for face to face, understand the changes being proposed or understand how to access or apply for targeted support in the future. They may be more reliant on local access points. we also recognise that some ethnic minority families may not feel that the services are available to cater for their specific cultural needs.
c)	Mitigating Actions for	There is a range of universal community-based youth activities which can
	Race	be accessed by young people regardless of their ethnicity. These include

activities at afterschool clubs, leisure centres, grass roots sports clubs, youth activities provided by groups such as Scouts and Brownies, or faith groups.

However, some of these will be chargeable activities and therefore may impact some young people's ability to participate.

Annual review of statutory youth offer to identify need and design an offer informed by local data and service user feedback/co-design.

Within the Family Hub Network work needs to be completed to identify gaps in provision and support community and voluntary groups to deliver a universal youth offer that delivers opportunities and meets need for young people regardless of race and ethnicity.

Where appropriate and informed by needs data, Family Hubs may run targeted groups for young people which may be discreet groups.

Co-production of digital content will be developed to be inclusive focusing on simple language that is either available to translate or is compatible with common translation software.

Targeted provision will be informed by a range of data including the number of children whose main language is not English, and the number of students from ethnically diverse backgrounds. Ongoing analysis will be required to ensure that Family Hub services are targeted at more "hidden" communities or ethnic groups.

Family Hubs will work alongside partner agencies, community groups and faith organisation to identify ethnic minority children, families, and communities in the local area to provide local solutions to service provision e.g., specifically designed groups and interventions to improve outcomes for diverse ethnic communities.

Enhanced community working and support from volunteer and peer support networks should increase awareness of services and access routes. Universal health services within the Start for Life offer may use interpretation services to support services for one-to-one support. In areas of higher need (e.g., in Dartford and Gravesham 15% of children don't have English as their main language) promotional materials for support should be available in alternative languages where required.

In order to address the concerns expressed within the consultation responses insofar as is possible, if commissioned youth services are not renewed it will be important for us to work with young people and former contracted providers to identify and signpost appropriate services that they will be able to access through in-house youth provision and any other local services (e.g. in the voluntary sector), via a directory of youth services. This will be provided through half yearly updates and will be managed centrally.

d)	Responsible Officer	Danielle Day
۵,	for Mitigating Actions	Programme Manager – Family Hubs
	- Race	Tropicalining manager raining mass
24.		Nitigating actions for Religion and belief
a)	Are there negative	No
. ,	impacts for Religion	
	and Belief? Answer:	
	Yes/No (If yes, please	
	also complete sections	
	b, c,and d).	
b)	Details of Negative	N/A
	Impacts for Religion	
	and belief	
c)	Mitigating Actions for	N/A
	Religion and belief	
d)	Responsible Officer	N/A
	for Mitigating Actions	
	- Religion and belief	
		litigating actions for Sexual Orientation
a)	Are there negative	Yes
	impacts for sexual orientation. Answer:	
	Yes/No (If yes, please	
	also complete sections	
	b, c,and d).	
b)	Details of Negative	We do not have any data on attendees.
5,	Impacts for Sexual	LBGTQ+ young people who attend commissioned youth services will have
	Orientation	to look for other youth opportunities which may not be as inclusive.
c)	Mitigating Actions for	There is a range of universal community-based youth activities which can
	Sexual Orientation	be accessed by young people regardless of sexual orientation. These
		include activities at afterschool clubs, leisure centres, grass roots sports
		clubs, youth activities provided by groups such as Scouts and Brownies, or
		faith groups.
		However, some of these will be chargeable activities and therefore may
		impact some young people's ability to participate.
		Amount review of statutom wayth offer to identify need and design on
		Annual review of statutory youth offer to identify need and design an
		offer informed by local data and service user feedback/co-design.
		Within the Family Hub Network work needs to be completed to identify
		gaps in provision and support community and voluntary groups to deliver
		a universal inclusive youth offer that delivers opportunities and meets
		need for young people regardless of sexual orientation.
		Where appropriate and informed by needs data, Family Hubs may run
		targeted groups specifically for LBGTQ+ young people, or ensure that
		other targeted groups are fully inclusive regardless of sexual orientation.
		In order to address the concerns expressed within the consultation
		responses insofar as is possible, if commissioned youth services are not
		renewed it will be important for us to work with young people and former

pregnant mothers

	yes, please also complete sections b, c,and d).	
b)	Details of Negative	N/A
-,	Impacts for Carer's	1.47.
	Responsibilities	
c)	Mitigating Actions for	N/A
	Carer's	
	responsibilities	
d)	Responsible Officer	N/A
	for Mitigating Actions	
	- Carer's	
	Responsibilities	