

## 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):

In-House Provision

#### 2. Directorate

Children, Young People & Education (CYPE)

#### 3. Responsible Service/Division

Integrated Children's Services (ICS)

### Accountability and Responsibility

#### 4. Officer completing EQIA

Note: This should be the name of the officer who will be submitting the EQIA onto the App.

Sian Dellaway & Chloe Parnell

#### 5. Head of Service

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

Damien Ellis

#### 6. Director of Service

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

Kevin Kasaven

### The type of Activity you are undertaking

#### 7. What type of activity are you undertaking?

**Service Change** – operational changes in the way we deliver the service to people. Answer Yes/**No**

No

**Service Redesign** – restructure, new operating model or changes to ways of working. Answer Yes/**No**

No

**Project/Programme** – includes limited delivery of change activity, including partnership projects, external funding projects and capital projects. Answer **Yes**/No

Yes

**Commissioning/Procurement** – means commissioning activity which requires commercial judgement. Answer Yes/**No**

Yes

**Strategy /Policy** – includes review, refresh or creating a new document. Answer Yes/**No**

Yes

**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.

KCC's current policy is to commission placements from private providers, in spot purchasing arrangements given the immediate and complex needs of children. This means our costs are determined by market forces and pricing decisions by providers, which whilst influenced through our commissioning approach, limits our financial control. Having an element of in-house provision would enable the Council to control costs more directly (e.g. property and staffing costs).

Children with complex needs require different types of care and support placements, which can lead to significant costs. These types of placements can often involve intensive ratios of staff support to keep the child safe and can involve specialist residential settings (in or out of county), with limited options available in the market. KCC is actively working to reduce the use of unregistered accommodation (i.e. accommodation which is not registered with Ofsted). Unregistered accommodation is used only exceptionally in an emergency when there is no other alternative in circumstances of imperative necessity and where the placement is essential to avoid a breach of the child's Convention rights.

Nationally, other local authorities have made the decision to invest in their own in-house provision, as well as commissioned provision, as part of a longer-term sustainable strategy for managing placement costs and rising demand for placements of children with complex needs. Many local authorities are already operating, or in the advanced stages of delivering a range of types of accommodation, including in-house residential homes.

The proposal is to develop a short/medium term service (emergency provision) to support stabilisation of the child's complex behaviours and step down their needs whilst suitable longer-term provision in more 'home like' settings is secured to achieve better long-term outcomes. This aims to avoid the number of children being placed in expensive commissioned placements, and/or unregistered placements.

This aims to:

- Enhance outcomes and service quality for children
- Transition children to better matched and best value registered placements
- Enhance our social work offer for children, young people and families
- Mitigate risk to KCC and our children by reducing the likelihood of unregistered placements, poor continuity of care or inappropriate settings
- Use KCC's commissioning arrangements to further negotiate improved costs across the market
- Using strengths-based models, increase likelihood of future cost avoidance by increasing independence and stability, better outcomes and emotional toolkits for children accessing the service.
- Ensure KCC is acting lawfully in only placing children in registered children's homes under section 22C(6)(c) of the Children Act 1989

This project is currently in its early stages, and further work is planned to define it in more detail. As the project develops and the plans become more defined, the EQIA will be reviewed and updated accordingly.

There will be a matching criteria that is specific to each child to ensure their safety, however this is yet to be scoped. The EQIA will be refreshed once this element has been designed.

## Section B – Evidence

*Note: For questions 9, 10 & 11 at least one of these must be a 'Yes'. You can continue working on the 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

No

**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.*

We have actively engaged with stakeholders through the In House Provision steering group, which meets regularly. This group includes service stakeholders, commissioning colleagues, infrastructure colleagues, and finance colleagues. Additionally, we have consulted with the Integrated Care Board (ICB) regarding potential therapeutic services. Currently, this project is in its early development stages and will be further refined over time. As the project progresses and becomes more defined, we will engage with additional stakeholders. Key stakeholders will be involved, consulted, and engaged through the agreed governance route, which includes DMT, CMT, and the CYPE Cabinet Committee for comprehensive oversight and decision-making. The EQIA will be reviewed and updated in line with future stakeholder engagement and as the project evolves.

**14. Has there been a previous equality analysis (EQIA) in the last 3 years?** Answer: Yes/No

No

**15. Do you have evidence/data that can help you understand the potential impact of your activity?**

Answer: Yes/No

**Uploading Evidence/Data/related information into the App**

*Note: At this point, you will be asked to upload the evidence/ data and related information that you feel should sit alongside the EQIA that can help understand the potential impact of your activity. Please ensure that you have this information to upload as the Equality analysis cannot be sent for approval without this.*

[Data](#)

## Section C – Impact

**16. Who may be impacted by the activity?** Select all that apply.

Service users/clients - Answer: Yes/No

Residents/Communities/Citizens - Answer: Yes/No

Staff/Volunteers - Answer: Yes/No

**17. Are there any positive impacts for all or any of the protected groups as a result of the activity that you are doing?** Answer: **Yes/No**

**Yes**

**18. Please give details of Positive Impacts**

**Age:** The establishment of KCC Ofsted registered children's residential homes will positively impact younger individuals (aged 0-17). Current data indicates that most children in unregistered placements are between 13 and 17 years old (87.5%), with a significant portion being 15 years old (22.5%). By investing in and developing KCC's own Ofsted registered facilities, there will be more opportunities to improve outcomes for children.

**Disability:** A notable percentage of children (42.5%) in unregistered placements are supported by the Strengthening Independence Service, which aids those aged 0-25 with complex needs or disabilities. Investing in in-house provision will allow these individuals to be placed in Ofsted registered facilities, managed by KCC, increased likelihood of the child's needs being met, enhancing outcomes for this group while more suitable and stable long-term placements are found, thereby reducing reliance on unregistered provision. There will also be a positive impact on children with a disability who currently have to travel to out of county placements, as this provision will negate the use of these.

**Sex:** The investment in and development of KCC Ofsted regulated residential children's homes is likely to benefit boys more, as a higher proportion of boys (62.5%) are in unregistered placements compared to girls (37.5%). Boys may particularly benefit from in-house provision that supports their independence and improves outcomes, reducing the need for unregistered placements.

Additionally, the development of KCC Ofsted regulated residential children's homes will create new job opportunities for KCC staff and the local community. These opportunities may be more appealing to females, as data shows that the majority of the CYPE workforce is female (86.7%).

**Gender identity/transgender:**

No positive impacts against this characteristic.

**Race:**

No positive impacts against this characteristic.

**Religion & Belief:**

No positive impacts against this characteristic.

**Sexual Orientation:**

No positive impacts against this characteristic.

**Pregnancy & Maternity:**

No positive impacts against this characteristic.

**Marriage & Civil Partnerships:**

No positive impacts against this characteristic.

**Carers Responsibilities:**

No positive impacts against this characteristic.

**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 impacts for Age? Answer: Yes/No  
(If yes, please also complete sections b, c, and d).

No

#### b) Details of Negative Impacts for Age

N/A

#### c) Mitigating Actions for Age

N/A

#### d) Responsible Officer for Mitigating Actions - Age

N/A

#### 20. Negative Impacts and Mitigating actions for Disability

a) Are there negative impacts for Disability? Answer: Yes/No  
(If yes, please also complete sections b, c, and d).

Yes

#### b) Details of Negative Impacts for Disability

There is an increased likelihood that CYP who have more complex needs are more likely to be placed within this type of provision.

#### c) Mitigating Actions for Disability

By providing in house provision for CYP with more complex needs it will mean that provisions set up for those with reduced needs will potentially be relieved.

#### d) Responsible Officer for Mitigating Actions - Disability

#### 21. Negative Impacts and Mitigating actions for Sex

a) Are there negative impacts for Sex? Answer: Yes/No  
(If yes, please also complete sections b, c, and d).

No

#### b) Details of Negative Impacts for Sex

N/A

#### c) Mitigating Actions for Sex

N/A

#### d) Responsible Officer for Mitigating Actions - Sex

N/A

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

a) Are there negative impacts for Gender identity/transgender? Answer: Yes/No  
(If yes, please also complete sections b, c, and d).

No

#### b) Details of Negative Impacts for Gender identity/transgender

N/A

#### c) Mitigating actions for Gender identity/transgender

N/A

<b>d) Responsible Officer for Mitigating Actions - Gender identity/transgender</b>
N/A
<b>23. Negative Impacts and Mitigating actions for Race</b>
<b>a) Are there negative impacts for Race?</b> Answer: Yes/ <b>No</b> (If yes, please also complete sections b, c, and d).
No
<b>b) Details of Negative Impacts for Race</b>
N/A
<b>c) Mitigating Actions for Race</b>
N/A
<b>d) Responsible Officer for Mitigating Actions – Race</b>
n/a
<b>24. Negative Impacts and Mitigating actions for Religion and belief</b>
<b>a) Are there negative impacts for Religion and Belief?</b> Answer: Yes/ <b>No</b> (If yes, please also complete sections b, c, and d).
No
<b>b) Details of Negative Impacts for Religion and belief</b>
N/A
<b>c) Mitigating Actions for Religion and belief</b>
N/A
<b>d) Responsible Officer for Mitigating Actions - Religion and belief</b>
N/A
<b>25. Negative Impacts and Mitigating actions for Sexual Orientation</b>
<b>a) Are there negative impacts for sexual orientation.</b> Answer: Yes/ <b>No</b> (If yes, please also complete sections b, c, and d).
No
<b>b) Details of Negative Impacts for Sexual Orientation</b>
N/A
<b>c) Mitigating Actions for Sexual Orientation</b>
N/A
<b>d) Responsible Officer for Mitigating Actions - Sexual Orientation</b>
N/A
<b>26. Negative Impacts and Mitigating actions for Pregnancy and Maternity</b>
<b>a) Are there negative impacts for Pregnancy and Maternity?</b> Answer: Yes/ <b>No</b> (If yes, please also complete sections b, c, and d).
No
<b>b) Details of Negative Impacts for Pregnancy and Maternity</b>
N/A
<b>c) Mitigating Actions for Pregnancy and Maternity</b>

N/A
<b>d) Responsible Officer for Mitigating Actions - Pregnancy and Maternity</b>
N/A
<b>27. Negative Impacts and Mitigating actions for marriage and civil partnerships</b>
<b>a) Are there negative impacts for Marriage and Civil Partnerships?</b> Answer: Yes/ <b>No</b> (If yes, please also complete sections b, c, and d).
No
<b>b) Details of Negative Impacts for Marriage and Civil Partnerships</b>
N/A
<b>c) Mitigating Actions for Marriage and Civil Partnerships</b>
N/A
<b>d) Responsible Officer for Mitigating Actions - Marriage and Civil Partnerships</b>
N/A
<b>28. Negative Impacts and Mitigating actions for Carer's responsibilities</b>
<b>a) Are there negative impacts for Carer's responsibilities?</b> Answer: Yes/ <b>No</b> (If yes, please also complete sections b, c, and d).
No
<b>b) Details of Negative Impacts for Carer's Responsibilities</b>
N/A
<b>c) Mitigating Actions for Carer's responsibilities</b>
N/A
<b>d) Responsible Officer for Mitigating Actions - Carer's Responsibilities</b>
N/A