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):

Children's Residential Home Commissioning Strategy

2. Directorate

Children, Young People and Education

3. Responsible Service/Division

Children's Commissioning

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.

Raj Tomsett

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

Caroline Smith

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

Ingrid Crisan

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

No

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

No

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.

Kent County Council (KCC) has developed a Children's Residential Home Commissioning Strategy to improve sufficiency, quality, affordability and sustainability within the Children's Residential Home market. The Strategy proposes the introduction of a commissioned contractual framework for residential provision, moving from a predominantly spot-purchasing model towards a more planned and strategic commissioning approach. The Strategy seeks to ensure there is sufficient high-quality provision available to meet the needs of children in care, reduce reliance on expensive out-of-county placements, improve placement stability, increase transparency of costs, strengthen relationships with providers and improve outcomes for children.

The Strategy is informed by KCC's statutory duties under Sections 22 and 22G of the Children Act 1989, including the duty to safeguard and promote the welfare of children in care and, as far as reasonably practicable, secure sufficient local accommodation to meet their needs. The strategy also aligns with KCC's Sufficiency Strategy, Reforming Kent 2025-2028, the Children in Care and Care Leavers Strategy, the Children and Young People Outcomes Framework, the Children and Wellbeing Act 2026 and the Children's Social Care National Framework.

The equality objective of this commissioning activity is to improve equitable access to suitable, safe and high-quality Children's Residential Home provision for all children in care, particularly those whose protected characteristics, disabilities or complex needs can create additional barriers in accessing well-matched placements. The Strategy seeks to reduce inequalities created by limited local provision, excessive placement distance from families and communities, and gaps in specialist provision for disabled children and children with complex needs.

The equality profile of the children in Children's Residential Homes is characterised by an older population and a high prevalence of disability. Children aged 13-17 account for 74.3% of all placements, while 50.4% have a recorded disability, with autism being the most common need. Males make up 60.4% of the cohort compared with 39.6% who are female. This highlights the importance of commissioning provision that is responsive to adolescent needs, transition planning, disability, and neurodiversity.

The cohort is also ethnically diverse, with 24.3% of children from Mixed, Asian, Black or Other ethnic groups. There are some gaps in equality data, particularly relating to religion, gender identity and sexual orientation, however, the information available provides a useful basis for assessment and highlights opportunities to further strengthen data collection, enabling a more comprehensive understanding of equality impacts in the future.

The Children's Residential Home Commissioning Strategy is expected to have an overall positive equality impact. No significant adverse impacts have been identified for most protected characteristics. The most significant equality consideration relates to disability, where existing market and sufficiency challenges can disproportionately affect disabled children. The Strategy includes specific actions to address these risks through dedicated specialist commissioning, market shaping activity and improved access to local provision.

The assessment concludes that implementation of the strategy is likely to advance equality of opportunity, improve outcomes for vulnerable children and support KCC's statutory duties as a corporate parent and commissioner of children's services.

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.

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.

The development of the Strategy has involved engagement with children, practitioners, providers and partner agencies. This includes:

- Children living in Children's Residential Homes.
- Virtual School Kent Participation Team.
- Social workers.
- Independent Reviewing Officers.
- Children in Care Teams.
- Total Placement Service.
- Kent-based residential providers.
- Providers supporting disabled children.
- NHS partners.
- SEND services.
- Commissioning teams.
- Operational managers and practitioners

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

Yes

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.

Section C – Impact

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

Service users/clients - *Answer: Yes/No*

Yes

Residents/Communities/Citizens - *Answer: Yes/No*

Yes

Staff/Volunteers - *Answer: Yes/No*

Yes

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

The strategy is expected to deliver a range of positive equality impacts by:

- Increasing local access to high-quality residential provision.
- Reducing unnecessary out-of-county placements.
- Supporting children to remain closer to family, friends, schools and communities where appropriate.
- Improving placement stability and continuity of relationships.
- Increasing availability of specialist provision for disabled children and children with complex needs.
- Reducing reliance on unregistered and emergency accommodation arrangements.
- Improving children's experiences and ensuring their views inform service development.
- Promoting independence, wellbeing, participation and positive outcomes.
- Supporting better educational continuity and emotional wellbeing.
- Ensuring commissioning arrangements focus on quality and outcomes rather than cost alone.

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

The strategy directly affects children aged 0-17 years living in or requiring a placement in a Children's Residential Home. Different age groups have differing requirements, with evidence showing particularly high demand amongst older adolescents aged 15-17 years. There is a risk that insufficient capacity for particular age groups could impact placement suitability and choice if market capacity does not develop as intended.

c) Mitigating Actions for Age

The proposed commissioning model includes specialist lots for planned Children's Residential Home provision, crisis care, therapeutic care, specialist disability provision and transitional accommodation for older children approaching adulthood. Placement matching processes will continue to be based on assessed need.

d) Responsible Officer for Mitigating Actions - Age

Caroline Smith

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

Evidence demonstrates that disabled children experience particular challenges within the Children's Residential Home market. They are more likely to require specialist provision, experience placement searches extending beyond Kent and be placed outside their local communities. Suitable local provision can be difficult to secure and there is increasing demand for placements that support complex physical, behavioural, developmental and health needs. These factors can increase inequalities for disabled children and their families.

c) Mitigating Actions for Disability

The strategy contains several specific mitigations:

- Creation of a dedicated lot for disabled children.
- Increased commissioning focus on specialist disability provision.
- Ongoing market shaping activity with providers.
- Greater emphasis on local sufficiency.
- Joint working with health, SEND and NHS partners.
- Improved contractual arrangements and planning to increase availability of local placements

d) Responsible Officer for Mitigating Actions - Disability

Sharon Howard

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

No evidence has been identified that the strategy creates a disproportionate adverse impact based on sex. The commissioning model is intended to provide equitable access to services based on assessed need.

c) Mitigating Actions for Sex

Providers will be required to comply with equality legislation, safeguarding legislation and contractual requirements relating to inclusion and non-discrimination.

d) Responsible Officer for Mitigating Actions - Sex

Caroline Smith

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

No evidence has been identified that the commissioning proposals create adverse impacts for transgender children or young people. Individual placement planning will continue to consider personal identity, wellbeing and safeguarding requirements.

c) Mitigating actions for Gender identity/transgender

Providers will be required to comply with equality legislation, safeguarding legislation and contractual requirements relating to inclusion and non-discrimination.

d) Responsible Officer for Mitigating Actions - Gender identity/transgender

Caroline Smith

23. Negative Impacts and Mitigating actions for Race

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

No

b) Details of Negative Impacts for Race

No evidence has been identified that the strategy will adversely affect children based upon race or ethnicity. All commissioned services will be expected to provide culturally appropriate care and comply with equality legislation

c) Mitigating Actions for Race

Providers will be required to comply with equality legislation, safeguarding legislation and contractual requirements relating to inclusion and non-discrimination.

d) Responsible Officer for Mitigating Actions – Race

Caroline Smith

24. Negative Impacts and Mitigating actions for Religion and belief

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

No

b) Details of Negative Impacts for Religion and belief

No adverse impact has been identified. Providers will be expected to support children's faith, belief and cultural needs as part of person-centred care planning

c) Mitigating Actions for Religion and belief

Providers will be required to comply with equality legislation, safeguarding legislation and contractual requirements relating to inclusion and non-discrimination.

d) Responsible Officer for Mitigating Actions - Religion and belief

Caroline Smith

25. Negative Impacts and Mitigating actions for Sexual Orientation

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

No

b) Details of Negative Impacts for Sexual Orientation

No adverse impact has been identified. Providers will be expected to deliver inclusive services which respect and support individual identity and wellbeing.

c) Mitigating Actions for Sexual Orientation

Providers will be required to comply with equality legislation, safeguarding legislation and contractual requirements relating to inclusion and non-discrimination

d) Responsible Officer for Mitigating Actions - Sexual Orientation

Caroline Smith

26. Negative Impacts and Mitigating actions for Pregnancy and Maternity

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

No

b) Details of Negative Impacts for Pregnancy and Maternity

The strategy includes provision for Residential Parenting Assessments which may positively support parents and their children. No adverse impacts have been identified.

c) Mitigating Actions for Pregnancy and Maternity

Providers will be required to comply with equality legislation, safeguarding legislation and contractual requirements relating to inclusion and non-discrimination

d) Responsible Officer for Mitigating Actions - Pregnancy and Maternity

Caroline Smith

27. Negative Impacts and Mitigating actions for marriage and civil partnerships

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

No

b) Details of Negative Impacts for Marriage and Civil Partnerships

The minimum legal age for marriage in England is 18. Children's Residential Homes are designed to accommodate children and young people under the age of 18 and are therefore not permitted to provide accommodation for individuals aged 18 or over.

c) Mitigating Actions for Marriage and Civil Partnerships

Providers will be required to comply with equality legislation, safeguarding legislation and contractual requirements relating to inclusion and non-discrimination

d) Responsible Officer for Mitigating Actions - Marriage and Civil Partnerships

Caroline Smith

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

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

No

b) Details of Negative Impacts for Carer's Responsibilities

The strategy is expected to positively impact parents, carers and wider family networks by increasing the availability of local provision and reducing unnecessary distance from home where appropriate. Maintaining family relationships and community connections was identified as an important issue by children and practitioners throughout engagement activity. Improving local sufficiency should help children remain closer to established support networks and make family involvement easier

c) Mitigating Actions for Carer's responsibilities

- Increase local residential capacity.
- Reduce reliance on out-of-county placements.
- Promote placement stability.
- Consider family and community links when sourcing placements.
- Incorporate children's voice into placement planning and commissioning decisions.

d) Responsible Officer for Mitigating Actions - Carer's Responsibilities

Caroline Smith