

Equality Impact Assessment (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 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 Family Hub Contracts
2. Directorate	Children, Young People and Education
3. Responsible Service/Division	Integrated Children's Services

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.	Ben Sherreard Programme Manager – Family Hubs
5. Head of Service Note: This should be the Head of Service who will be approving your submitted EQIA.	Dan Bride, Director of Youth Justice, Adolescent Response
6. Director of Service Note: This should be the name of your responsible director.	Ingrid Crisan 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	Service Change – <i>operational changes in the way we deliver the service to people.</i>
	Service Redesign – <i>restructure, new operating model or changes to ways of working</i>
	Project/Programme – <i>includes limited delivery of change activity, including partnership projects, external funding projects and capital projects.</i>
Yes	Commissioning/Procurement – <i>means commissioning activity which requires commercial judgement.</i>
	Strategy /Policy – <i>includes review, refresh or creating a new document</i>
	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 have due 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.

The Case for Change

The Department for Education (DfE) has selected Kent County Council (KCC) as a Family Hub and Start for Life Transformation Authority. Family Hubs are about bringing together and integrating support services for children, young people, and families so that they are easier for people to access. The services within the Family Hub model include, but are not be limited to:

- KCC Children's Centres
- KCC Youth Hubs and community youth provision
- KCC Commissioned Health Visiting Services
- Community-based Midwifery care
- Other community organisations

In November 2023 KCC Cabinet took [decision 23/00092](#) to implement the Family Hub model across the County. At the time, that included transformation and efficiency plans for 56 Family Hub locations across Kent not including the two Commissioned centres, Millmead and Seashells (in line with the Kent Communities Programme [decision 23/00101](#), also from November 2023).

Due to the fact that Millmead and Seashells Family Hub services are both externally commissioned, they were not included within the scope of the Kent Communities Programme analysis.

There has been a sequence of decisions that deliver savings against what was the previous Open Access (now Family Hub) budget as set out in the MTFP (more detail in the next section). Firstly decisions were made that considered the Family Hub model itself and the buildings used to deliver the services. These decisions have been implemented, delivering savings through model redesign, staff restructure and building rationalisation. With the commissioned contracts ending in March 2025, the next consideration in sequence, as we seek to make the remaining saving outlined in the MTFP, is whether to renew these contracts or whether the service provision can be delivered differently, thus saving money for the Council.

The Council is facing very significant financial pressures, for a number of reasons as set out in 'Securing Kent's Future' (August 2023 and October 2023). The document sets out the urgent steps needed to return the Council to financial sustainability, by reducing overspend in its budget to avoid further need to use limited reserves to fund revenue overspends. This would weaken the financial resilience of the authority and limit the scope for the use of reserves to invest in transformation necessary to address the structural deficit.

The financial challenges faced by the Council cannot be ignored. The Council has statutory duties to deliver a balanced budget, provide statutory services, including adult social care and children's services, and secure value for money in all spending decisions.

There is a clear financial driver for this decision. The second driver of this decision is the current imbalance in the Family Hub delivery model across Kent and the resultant duplication of costs for the Council. Currently there are 50 Family Hub sites across the county, including within Swale and Thanet, which are staffed by KCC Family Hub practitioners. These centres provide Family Hub services for families in Kent staffed and funded from the CYPE base budget. By providing Family Hub services from these two independent centres there is an imbalance in the delivery model as these are the only two centres where services are externally commissioned. These centres link in with partners such as Health and VCS organisations. However the links to other KCC ICS/Early Help services are not as strong as within the rest of the KCC in-house network. We are also duplicating cost in terms of management (each District in Kent has a KCC District Manager for example), HR, IT and finance support through the commissioning of the two centres.

The commissioned Family Hub contracts cost the council £426k per annum. Analysis shows that the current Family Hub service delivers 14 hours of activity per week at Seashells and 9 hours of activity per week at Millmead that are directly commissioned under the contract. These hours can be accommodated at the alternative sites identified (Sheppey Gateway for Seashells and the three nearby in-house Family Hubs in

Margate for Millmead). Vacancies held within the Family Hub staff will accommodate the staff eligible for TUPE to deliver these sessions at the alternative locations.

Public Consultation

A proposal to not renew the two commissioned service contracts when they end in March 2025 was put to public consultation between 30 July 2024 and 22 September 2024. The consultation set out the rationale for the proposal, a summary of other options considered, and the detail of alternative arrangements for the delivery of Family Hub services for the impacted communities.

A consultation version of the Equalities Impact Assessment was also provided for review during the consultation and feedback was sought from respondents to highlight any additional considerations that should be made in regard to equalities.

Consultation Proposals for the Cessation of the Commissioned Family Hub Contracts

The proposal on which we consulted was to not retender the two commissioned contracts when they come to an end on 31 March 2025.

This will affect the following two contracts:

Children and Families Ltd	Seashells Family Hub, Sheerness
Millmead Children's Centre Partnership Ltd	Millmead Family Hub, Margate

Seashells

In relation to Seashells the proposal to not renew the contract when it ends in March 2025 would mean the end of KCC funded Family Hub services at the Seashells centre.

The services currently on offer at Seashells under the commissioned Family Hub contract include (*denotes booking or referral required):

- Baby Massage*
- Baby and Toddler Sing and Sign
- Breastfeeding Clinic
- Breast Pump Hire
- Little Talkers*
- Sensory Hub
- Solihull Antenatal Class
- Solihull Parenting*
- Stay and Play
- Triple P Parenting Course*
- 1-2-1 Family Work*

It is the proposal that a comparable (although not 'like-for-like') Family Hub service will be offered at the Sheppey Gateway as an alternative. The Gateway is less than a 5-minute walk from the current Seashells centre and subject to a specific timetable, the expected service offer would include:

- Baby Massage*
- Birth Registrations (Library and Registration Service)
- Citizens Advice Clinic
- Infant Feeding Support
- Little Talkers*
- Police Community Support Officer (PCSO) Drop In
- Playground Creative Play (Libraries and Registration Service)
- Stay and Play
- Triple P Parenting Course*

- 1-2-1 Family Work

Millmead

In relation to Millmead, the proposal to not renew the contract when it ends in March 2025 would mean the end of KCC funded Family Hub services at the Millmead Centre.

The services currently on offer at Millmead include (*denotes booking or referral required):

- Baby Massage*
- Book Library
- Breastfeeding Support
- Breast Pump Hire*
- Cost of Living Drop in
- Citizens Advice Clinic
- Cygnet Programme*
- Garden Club
- Health Visiting Checks (delivered by Health Visiting team)
- Healthy Baby Group
- Introducing Solids Workshop
- Little Explorers
- Little Talkers*
- One You Service (delivered by East Kent Hospitals University NHS Foundation Trust)
- PCSO Drop In
- Stay and Play
- Triple P Parenting Course*
- You and Your Baby*
- 1-2-1 Family Work*

Thanet has the largest network of Family Hub locations available to residents, in line with the higher levels of need as set out in the [Kent Communities Programme \(KCP\) decision](#). In consultation with the relevant local practitioners, we believe that the in-house Family Hub network is sufficient to meet the needs of residents currently served by the Millmead Centre due to current underutilisation of the services on offer across the rest of the network. Alternative Family Hub locations are within travel distances that were accepted for wards with comparable need in the KCP decision. Cliftonville Family Hub is 1.3 miles away while Margate Family Hub is 1.4 miles away and Northdown Road Family Hub is 1.45 miles away. Millmead is located in Dane Valley Ward which has an identified need score of 69/100 (KCP data analysis). In the KCP decision, it was agreed to close the Ladybird CC in Queenborough and Halfway Ward which had a need score of 66/100. The nearest alternative location for Ladybird CC was 3.3 miles away.

The services available at the three alternative locations include (*denotes booking or referral required):

The sessions available at Cliftonville Family Hub include (as at June 2024 and subject to further timetable amendments): *booking or referral required.	The sessions available at Margate Family Hub include (as at June 2024 and subject to further timetable amendments): * booking or referral required.	The sessions that will be available from Northdown Road Family Hub by the end of March 2025 include: *booking or referral required.
<ul style="list-style-type: none"> • Baby Massage* • Beyond the Page* • Breast Pump Scheme* • Cygnet Course* • Family Fun Time / Stay and Play • Food Bank • Community Pantry (from September 2024) 	<ul style="list-style-type: none"> • Baby Massage* • Breastfeeding Support Group • Breast Pump Scheme* • Citizens Advice Clinic • Cost of Living Support Group • Cygnet Course* 	<ul style="list-style-type: none"> • Baby Massage* • Breastfeeding Support Group • Breast Pump Scheme* • Citizens Advice Clinic • Community Café Space • Cost of Living Support Group

<ul style="list-style-type: none"> • Healthy Child Clinic • Kent Adult Education Courses • Little Bookworms • Little Talkers* • Managing Behaviour Strategies* • My First Year and Me • One You • Sensory Room • Triple P Baby Course* • 'Understanding You, Understanding Your Child' Parenting Programme • 1-2-1 Family Work 	<ul style="list-style-type: none"> • Family Fun Time / Stay and Play • Food Bank • Groups and Services for 8-19yr olds (25yrs with SEND) • Health Visiting and Wellbeing Reviews • Infant Feeding Clinic • Kent Adult Education Courses • Little Bookworms • Little Explorers • Little Talkers* • Managing Behaviour Strategies* • Midwifery Services • My First Year and Me • One You • Sensory Room • Triple P Baby Course* • 'Understanding You, Understanding Your Child' Parenting Programme • 1-2-1 Family Work 	<ul style="list-style-type: none"> • Cygnet Course* • Family Fun Time / Stay and Play • Food Bank • Groups and Services for 8-19yr olds (25yrs with SEND) • Healthy Child Clinic • Introducing Solids Workshops • Kent Adult Education Courses • Little Bookworms • Little Explorers • Little Talkers* • Managing Behaviour Strategies* • Midwifery Services • Outdoor and Indoor Sports Hall/Courts • Triple P Baby Course* • 'Understanding You, Understanding Your Child' Parenting Programme • Young Lives Foundation • 1-2-1 Family Work
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Consultation Feedback: Overview

In total 1,016 consultees provided a formal response using the questionnaire. 672 consultees chose to answer questions in relation to Seashells and 433 answered in relation to Millmead. 99 respondents provided comments that addressed the proposals for both sites. The demographic breakdown of the responses is provided in a later section.

64% of consultees responding to the consultation currently use the Seashells centre, whilst 20% indicated they had used the centre in the past. 16% indicated that they do not use, nor have they used the Seashells centre.

73% of consultees responding to the consultation currently use the Millmead centre, whilst 18% indicated they had used the centre in the past. 10% indicated that they do not use, nor have they used the Millmead centre.

Responses to the consultation did not focus on specific impacts for individual protected characteristic. Instead, commentary on equalities was most commonly used to reiterate the general sense of overall impact that the loss of the services at these centres may have on residents generally.

Of those answering questions relating to Seashells, the most common themes of feedback arising were that the centre is vital to the community (32%) and that the Gateway site proposed as an alternative will not be suitable and will not offer the same service (25%).

Of the specific issues linked to equalities that were identified by respondents commenting on Seashells, impact on children (14%), accessibility (10%), impact on mums (8%) and impact on those with SEND or that are neurodivergent (8%) were most commonly raised. However, these issues do not appear to have been raised in order to make a point about the impact on protected characteristics, but more to demonstrate the overarching sense of loss for the community as a whole.

Of those answering questions relating to Millmead, the most common themes of feedback arising were that Millmead is accessible locally and that the alternatives sites are not accessible on foot or by bus (53%) and that Millmead is a much-needed resource for deprived families locally (37%).

Of the specific issues linked to equalities that were identified by respondents commenting on Millmead, difficulties accessing public transport (20%), impact on children (17%), accessibility for those who are disabled or mums with pushchairs (16%) and impact on those with SEND or that are neurodivergent (4%) were most commonly raised. However, these issues do not appear to have been raised in order to make a point about the impact on protected characteristics, but more to demonstrate the overarching sense of loss for the community as a whole.

Consultation feedback relevant to individual protected characteristics is considered in more detail below.

Summary of Options

Five options were considered as part of the options appraisal ahead of the consultation:

- Option 1: Do not renew the two commissioned contracts and provide services within existing KCC locations.
- Option 2: Reprocure significantly reduced contracts.
- Option 3: Reprocure comparable contracts and close other Family Hub locations in other areas (as this would save building costs).
- Option 4: Reprocure comparable contracts and reduce services in alternative Family Hub locations (as this would save service costs).
- Option 5: Do not renew the two commissioned contracts but find alternative standalone locations for alternative provision.

One of the main themes that emerges from the consultation feedback is the importance of having these services available for the communities within the familiar, existing settings of Millmead and Seashells. In response to this feedback, we have explored a sixth option:

- Option 6: Do not renew the two commissioned contracts, but instead hire space for KCC Family Hub staff to deliver the services from within the two settings.

Option 1: Do not renew the two commissioned contracts and provide services within existing KCC locations. This option is the proposal for discussion by members and was the basis for the public consultation. It is expected that this option will achieve the £426k saving within the MTFP. As set out above, services would be available to residents from alternative locations. This option would provide consistency across the entire Family Hub service as it would mean that the whole provision is in-house. The consultation report and EqIA set out the impact on service users of this option, however it is expected that this option has the greatest impact on service users of all of the options considered.

Option 2: Reprocure significantly reduced contracts. This option would not achieve the full saving within the MTFP. It would mean that savings would need to be identified elsewhere to make up the shortfall as renewing the contracts, albeit on a reduced basis, would still require revenue expenditure. This option would also lead to a reduction in services available in the two locations, given the reduced contract value, requiring service users to access these services from alternative locations. There would also remain an inconsistency in our approach to Family Hub provision as we would retain the two commissioned sites while the rest of the Family Hub model is delivered in-house. Currently there are 50 Family Hub sites across the county, including within Swale and Thanet, which are staffed by KCC Family Hub practitioners. These centres provide Family Hub services for families in Kent staffed and funded from the CYPE base budget. By providing these two commissioned centres there is an imbalance in the delivery model as these are the only two centres that are externally commissioned. These centres link in with partners such as Health and VCS organisations. However the links to other KCC ICS/Early Help services are not as strong as within the rest of the KCC in-house network. We are also duplicating cost in terms of management (each District in Kent has a KCC District Manager for example), HR, IT and finance support through the commissioning of the two centres.

Option 3: Reprocure comparable contracts and close other Family Hub locations in other areas (this saving building costs). Whilst this option could achieve the full MTFP saving of £426k, it would not meet the saving requirement in the timeframe set out in the MTFP. It would also require further cuts to be made, when the Kent Communities Programme and Family Hub Model decisions (both November 2023) set out the network of Family Hub buildings in relation to need, including reduction in the number of children's centres across the county whilst retaining the number of centres required to meet the need in each District. This option would mean the re-procurement of the commissioned contracts, however access to services would be impacted elsewhere given the reduction in buildings to meet the £426k saving. This option would continue the inconsistency in our approach to Family Hub provision as explained above.

Option 4: Reprocure comparable contracts and reduce services in alternative Family Hub locations (this saving service costs). This option was discounted ahead of consultation because whilst it could achieve the full MTFP saving of £426k, it would likely take much longer to do so. It would also require further cuts to be made, when the Kent Communities Programme and Family Hub Model decisions (both November 2023) set out the network of Family Hub buildings in relation to need, including reduction in the number of children's centres across the county whilst retaining the number of centres required to meet the need in each District.. This option would mean the re-procurement of the commissioned contracts, however services would be reduced elsewhere to meet the £426k saving. This option would continue the inconsistency in our approach to Family Hub provision as set out above.

Option 5: Do not renew the two commissioned contracts but find alternative standalone locations for alternative provision. This would not achieve the full saving within the MTFP. This option would mean that savings would need to be identified elsewhere to make up the shortfall despite the fact the commissioned contracts would not be renewed. This is because revenue would be required to provide the service from other non-KCC locations within the communities. The revenue cost of hiring space locally is estimated at between approximately £130k and £180k per year were we to implement this option for both Seashells and Millmead, or between £65k and £90k for one location. This would represent a pressure on potentially both CYPE and Corporate Landlord budgets. As set out under Option 1, alternative provision is available from within existing KCC buildings (current Family Hubs in the case of Millmead and Sheppey Gateway in relation to Seashells).

Option 6: Do not renew the two commissioned contracts, but instead hire space for KCC Family Hub staff to deliver the services from within the two settings. This option has been developed in response to the consultation feedback (see Section 5). Many respondents expressed the view that the current settings (Millmead and Seashells) are in themselves important to service users and the communities. There is also the view that the cessation of these two contracts may impact the overall sustainability of the centres. As a response to this feedback officers have sought to understand the opportunity to hire space within the existing centres. This would mean a shortfall in the saving offered against the MTFP target, as rent would be payable. This is currently paid by the Corporate Landlord budget, not the CYPE budget. Early indications suggest that the combined rental costs to hire space at both centres would be between approximately £130k and £180k per year. This would leave a shortfall in the MTFP saving as only between £246 and £296k would be achieved under this option. It should be noted however that this would be subject to formal process and at this time scoping conversations have not taken place due to the providers resistance to enter into any conversations ahead of a decision. The rental cost represents the main pressure on the revenue budget. As explained above staffing increase as a result is TUPE is not expected to increase revenue pressure as vacancies are held currently across the network. It is suggested that this option is discounted as it would not deliver the full saving set out in the MTFP.

Summary of Impact and Justification

Within the consultation, a significant majority of responses were received by women (64%) compared to men (13%). The rest of the respondents marked that they would prefer not to provide their gender. There is a clearly identified crossover between sex and age as demonstrated in the consultation response where over 50% of respondents were between 25 and 49 years old (25-34: 27%, and 35-49: 25%). It is acknowledged that generally women bear the greater responsibility for childcare and as such the protected characteristics for sex and for age require careful consideration.

18% of respondents also identified that they manage a disability, with 27% of respondents preferring not to answer, leaving that question blank. Therefore, careful consideration must be given for the protected characteristic of disability, particularly where that intersects with sex and age as highlighted above.

Due to the nature of this service, it is also to be expected that the vast majority of respondents have children that would be impacted by these proposals (63%). Of the responses received, 53% identified that they have children between the ages of 0 and 5.

Option 1 would carry greater impacts for these characteristics as women, children and those with disabilities. They would be required to access the Family Hub services at different locations, in the case of Millmead, that may mean accessing public transport that could present a difficulty for any disabled individuals, anyone managing additional SEND requirements, those with pushchairs or with any additional equipment.

Option 2 would still carry an impact for those residents with protected characteristics given that on a reduced contract the expectation is that some service provision would be discontinued. This would create the necessity to travel to alternative locations to access services that have been displaced, despite some services remaining included at the two centres under a renewed, albeit reduced, contract.

Options 3 and 4 would have the least impact on current service users at Seashells and Millmead as they both provide for re-procurement of comparable contracts at both centres. However, in order to meet the financial challenges, cuts would need to be made elsewhere, thereby creating an impact on other residents.

Option 5 would have an impact on protected characteristics, however the scale of impact is difficult to define as the services would be relocated to as yet unidentified alternative locations. These locations may be less suitable for the provision of Family Hub services than the current alternative options proposed (a reasonable assumption considering they all currently accommodate community services) and therefore may be more impactful for residents with protected characteristics.

Option 6 would have similar impact to Options 3 and 4 as it allows for the continuation of Family Hub service delivery at the current sites. However, as with Options 3 and 4, cuts would need to be made elsewhere, thereby creating an impact for other residents.

The hours of service provision delivered under the contracts (9 hours per week at Millmead and 14 hours per week at Seashells) can be accommodated within the alternative locations. Therefore it is proposed that the provision will remain sufficient to meet local need, and that assistance in accessing the service from alternative locations is the main mitigating factor.

The sections below analyse the impact of the proposal on individuals with each protected characteristic in turn, however the primary impact on groups with protected characteristics centre around any additional difficulty they will have navigating and understanding the changes to the service locations; particularly if required to travel further to access the services offered by the Family Hub network.

This may likely include the need to use public transport. Transport analysis related to Millmead demonstrates that 54,189 homes are within a 35-minute bus journey from the Millmead centre. All of these 54,189 homes are within a 35-minute bus journey of an alternative KCC Family Hub location. The Sheppey Gateway is 0.2 miles from the Seashells centre and is served by the exact same public transport network.

A point to note, is that there are parts of Dane Valley Ward (in which Millmead is located) which are closer to the Margate Family Hub than they are to the Millmead centre. The distance of 1.3 miles quoted is the distance from Millmead to the alternative Margate Family Hub location. Some parts of the community are actually closer to the alternative locations than Millmead and as such are less than 1.3 miles away.

It is also acknowledged that there are likely to be impacts on residents with protected characteristics who already access services from our proposed alternative provisions (Margate Family Hub, Cliftonville Family Hub and Northdown Road Family Hub for Millmead and Sheppey Gateway for Seashells) when we consider that

there will be additional people accessing a Family Hub offer in those locations. The existing services at the alternative locations in Margate are not currently running at full capacity

Where there are crossovers between protected characteristics, the impact may be particularly significant. For example, a young mother with a child that has SEND requirements, or who is also from an ethnically diverse background, may find the changes particularly difficult.

It is worth making the general point here that any barriers to access for those with protected characteristics (such as those set out in the specific sections below) may lead to some residents choosing not to access the service at all. If this is unmitigated, then this would potentially lead to negative outcomes for residents in precisely the areas which Family Hubs are designed to improve. If residents do not access the infant feeding support they require through the Family Hub network, they may end up with poorer health outcomes for their child, greater impact on their own emotional wellbeing and a diminished parent-infant relationship. Therefore, the mitigations listed below are vital.

The proposed mitigations are as follows:

1. *Community Development Workers*

Highlighted below in relation specifically to the group with ethnically diverse backgrounds, our new Community Development Workers across the county will be able to help service users with the transition to the new service access arrangements.

2. *Reimbursement of bus fares for families travelling to new locations*

As a direct response to the consultation feedback, suggesting that we could reimburse bus fares for those attending the Family Hubs that previously attended Millmead Family Hub. Families would present their ticket at the Family Hub location they attend and be reimbursed by the Family Hub staff. This is likely to be a time limited offer with a view to easing the transition phase and mitigating any drop-off of service access as a result. The analysis demonstrates that the alternative locations do ensure sufficient provision for the local need, and this mitigation measure is designed to mitigate against any drop off due to the change of location.

3. *Alternative methods of access.*

As set out in the EqlA for the Family Hub Transformation decision, (available here [23/00092](#)) a range of support and guidance is available online for residents to access at any time. It is acknowledged in that EqlA that groups with protected characteristics may have additional needs when accessing services in alternative ways, including online.

4. *Access to a broader range of services from a single location.*

The use of the alternative locations will mean greater access to wider KCC services, such as SEND support (all proposed alternatives) or birth registrations and library services (Sheerness Gateway).

The two districts in question, Thanet for Millmead and Swale for Seashells, are both areas of high need, as set out in the Kent Communities Programme work. Given this, these two district receive the most funding from the Family Hub budget; 10.1% and 9.8% respectively. This is excluding the cost of the commissioned contracts, therefore, if the decision is taken not to renew the contracts, these two districts will still be the most highly funded.

The Kent Communities Programme (KCP) decision taken in November 2023 ([23/00101](#)) proposed a network of Family Hub buildings across the county. The KCP model was based on a thorough analysis of the need for services prevalent within all communities across Kent.

As highlighted above our analysis shows that the current Family Hub service includes 14 hours of activity per week at Seashells and 9 hours of activity per week at Millmead that are directly commissioned under the contract. These hours can be accommodated at the alternative sites identified (Sheppey Gateway for Seashells and the three nearby in-house Family Hubs in Margate for Millmead). Vacancies held within the Family Hub staff will accommodate the staff eligible for

TUPE to deliver these sessions at the alternative locations. It is therefore proposed that the provision delivered through the retained Family Hub network alternatives is sufficient to meet local need.

As a benchmark, a comparison of the number of KCC Family Hub locations per 10,000 people aged 0-19 has been made against the same metric for other Family Hub authorities. This comparison demonstrates that the KCC has 1.3 Family Hubs per 10,000 people aged 0-19. This is the highest proportion of Family Hubs per 10,000 people aged 0-19 when compared to other authorities with similar quantum of 0-19 year olds, as the table below demonstrates.

Authority	0-19 Year Olds (to nearest 10,000)	Family Hubs per 10,000 0-19 Year Olds
Kent	370,000	1.3
Essex	340,000	1.03
Birmingham	330,000	0.67
Surrey	290,000	0.72

Given the significant financial challenge facing the Council, the mitigation measures outlined, and the analysis provided, it is therefore considered justified to propose making the required saving by choosing not to renew these two contracts.

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 – an analysis of the protected characteristics of the respondents to the consultation is as follows:

GENDER	Number of consultees answering	% of consultees answering
Male	134	13%
Female	653	64%
Prefer not to answer / left blank	229	23%

GENDER SAME AS BIRTH	Number of consultees answering	% of consultees answering
Yes	760	75%
No	1	0%
Prefer not to answer / left blank	255	25%

AGE	Number of consultees answering	% of consultees answering
0-15	21	2

16-24	57	6
25-34	275	27
35-49	256	25
50-59	74	7
60-64	40	4
65-74	45	4
75-84	19	2
85 & over	2	0.2%
Prefer not to answer / left blank	227	22%

RELIGION / BELIEF	Number of consultees answering	% of consultees answering
Yes	228	22%
- Christian	185	18%
- Hindu	5	0.5%
- Jewish	3	0.3%
- Muslim	11	1%
- Sikh	2	0.2%
- Other	15	1%
No	502	49%
Prefer not to answer / left blank	286	28%

DISABILITY	Number of consultees answering	% of consultees answering
Yes	186	18%
- Physical impairment	71	7%
- Sensory impairment (hearing, sight or both)	17	2%
- Longstanding illness or health condition, such as cancer, HIV/AIDS, heart disease, diabetes or epilepsy	82	8%
- Mental health condition	87	9%
- Learning disability	39	4%
- Other	10	1%

No	553	54%
Prefer not to answer / left blank	277	27%

PRESENCE OF CHILDREN	Number of consultees answering	% of consultees answering
I/we have children	641	63%
- 0-1 year old	225	22%
- 2-5 years old	319	31%
- 6-10 years olds	187	18%
- 11-19 years old	177	17%
I am / we are expecting a child	62	6%
I/we do not have children	79	8%
Prefer not to answer / left blank	234	23%

SEXUALITY	Number of consultees answering	% of consultees answering
Heterosexual/Straight	686	68%
Bi/Bisexual	29	3%
Gay man	3	0.3%
Gay woman/Lesbian	10	1%
Other	3	0.3%
Prefer not to answer / left blank	285	28%

ETHNICITY	Number of consultees answering	% of consultees answering
White English	665	65%
White Scottish	5	0.5%
White Welsh	4	0.4%
White Northern Irish	3	0.3%
White Irish	6	1%
White Irish Traveller	3	0.3%
Asian or Asian British Indian	5	0.5%
Asian or Asian British Pakistani	5	0.5%
Asian or Asian British Bangladeshi	3	0.3%

	Mixed White & Black Caribbean	10	1%	
	Mixed White & Black African	6	1%	
	Mixed White & Asian	5	0.5%	
	Black or Black British Caribbean	1	0.1%	
	Black or Black British African	9	1%	
	Other	41	4%	
	Prefer not to answer / left blank	245	24%	
	CARER			
		Number of consultees answering	% of consultees answering	
	Yes	178	18%	
	No	569	56%	
	Prefer not to answer / left blank	269	26%	
	We also have the usage data that informed the consultation version of the EqIA.			
10. Is it possible to get the data in a timely and cost effective way? <i>Answer: Yes/No</i>	N/A			
11. Is there national evidence/data that you can use? <i>Answer: Yes/No</i>	Yes			
12. Have you consulted with Stakeholders? <i>Answer: Yes/No</i> <i>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.</i>	Yes			
13. Who have you involved, consulted and engaged with? <i>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.</i>				
A public consultation process was carried out between 30 July 2024 and 22 September 2024. The consultation gave an opportunity for service users, community groups, partners, staff and residents to give feedback on the proposals. During this consultation, face to face consultation events were held in order to ensure that the voice of the service users at each of the two impacted centres was captured.				
Of the 672 respondents that commented in relation to Seashells, 45% opted to provide a response specifically related to equalities.				


Of the 433 respondents that commented in relation to Millmead, 39% opted to provide a response specifically related to equalities.

Almost all of the response would be classified as indicating opposition to the proposal as set out at consultation. Given the demographic data above shows a high percentage of respondents were women, were parents and were between the ages of 25 and 49 it is reasonable to infer that individuals with those protected characteristics were opposed to the proposals.

14. Has there been a previous equality analysis (EQIA) in the last 3 years? Answer: Yes/No
 Yes – the pre-consultation EqIA.
 There was an EqIA for the Family Hub model transformation linked to decision [23/00092](#). However, that EqIA did not consider the two commissioned Family Hubs specifically.

15. Do you have evidence/data that can help you understand the potential impact of your activity? Answer: Yes/No
 Yes - user data for each site that has been broken down by age, gender, ethnicity, and SEND requirements.
 Demographic data captured through the consultation responses (detailed above).

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.



110020_EqIA_Final.xlsx

Section C – Impact

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

Service users/clients <i>Answer: Yes/No</i>	Yes	Residents/Communities/Citizens <i>Answer: Yes/No</i>	Yes
Staff/Volunteers <i>Answer: Yes/No</i>	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 proposal to not renew the commissioned centre contracts does not itself present any positive impacts for groups with protected characteristics. However, the proposed alternative provision does present some positive benefits:

Millmead

The proposed alternative locations for the service are Cliftonville Family Hub (1.3 miles away), Margate Family Hub (1.4 miles away) and Northdown Road Family Hub (1.5 miles away). The ability for residents to access the full range of Family Hub services on offer, as opposed to the limited age-range activities at the commissioned centres represents a benefit to service users.

Seashells

The proposed alternative location for the service is at the Sheppey Gateway and Library which is approximately a five minute walk from the current location.

The Sheppey Gateway already provides a number of services that residents with protected characteristics may find beneficial, such as advice about facing financial hardship and registering births. Having these services all in one location, reducing the need for residents, particularly those with physical disabilities and young mums with prams, from needing to travel to additional locations to access these services, represents a benefit.

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

<p>a) Are there negative impacts for age? Answer: Yes/No (If yes, please also complete sections b, c, and d).</p>	<p>Yes</p>
<p>b) Details of Negative Impacts for Age</p>	<p>Children Usage data shows that at in 2023, 1449 families accessed Family Hub sessions at the Millmead centre and 1869 families accessed Family Hub sessions at the Seashells centre.</p> <p>As set out above, 54% of consultees indicated that they have children between the ages of 0 and 5 years old.</p> <p>The proposal to not renew the commissioned contracts could disproportionately impact those 0-5 year olds receiving support towards their development milestones associated with health, education, and parent bonding. They will be reliant on their parent/carers being able to access another centre, who may have to travel further to access groups and support, alternatively they may access provision less frequently.</p> <p>14% of respondents commenting on Seashells and 17% commenting on Millmead specifically raised the impact of the loss of the centre on children.</p> <p>An example of the feedback received from consultees is here:</p> <p><i>“The Isle of Sheppey is greatly lacking in services such as Seashells. Without this centre, there is nothing for the catchment age group to do in a structured setting with peers until they reach nursery age. Thus. depriving these children of much needed development skills such as interacting with peers and fine motor skills. These hubs allow new parents to the area to get to know what is available and to meet people. Without these centres those less fortunate could easily become forgotten about. They provide a wealth of information and support for parents of all ages and backgrounds.”</i></p> <p>The transport implications for parents/carers are discussed later but is likely to impact on this age group. If their parent/carer is unable to take them to the nearest alternative Family Hub, they may need to access alternative provision in the community or may stop accessing services. This could have an impact on their social, physical, or educational development.</p>

As set out above, any barrier to access could lead to poorer outcomes for children in families that require support from the Family Hub network, if not suitably mitigated. For example, they may suffer from poorer health outcomes if their parents do not receive infant feeding support when needed. Equally, they may suffer poorer outcomes and diminished social abilities if they do not access the early language support available.

Older Children and Young People – 6-18 Year Olds

Our usage data shows that in 2023, 384 older children aged 6-18 accessed Millmead centre and 759 older children aged 6-18 accessed the Seashells centre. Whilst these figures are significant, there is a noticeable drop off in the number of children aged 5 and over visiting the centres. This is partly due to the children reaching school age and partly due to the fact that the majority of sessions running at the centres under the contracts are aimed at children below the ages of 5. The KCC Family Hub offer covers the full range of ages from 0-19 (25 with SEND).

Of the consultees responding, 2% were 0-15 year olds and 6% were 16-25 year olds. Additionally, 35% of respondents indicated that they had children between the age of 6 and 19.

Similar to the above, the proposal to not renew the Commissioned Centre contracts will mean families with older children and young people will have to travel to different locations and sometimes further to access sessions, support and general advice.

The transport implications for parents/carers are discussed later but is likely to impact on this age group. If their parent/carer is unable to take them to the nearest alternative Family Hub, they may need to access alternative provision in the community or may stop accessing services. This could have an impact on their social, physical, or educational development.

Parent/Carers – 25-39 Year Olds

Our usage data shows that at in 2023 1,034 parents/carers aged 25-39 accessed Millmead centre and 1,407 parents/carers aged 25-39 accessed the Seashells centre.

Of those that responded to the consultation, the largest single group of respondents were 25-24 years old (27%).

We recognise that parents (most likely to be aged between 25 and 39) may need to access services differently, may need to travel to alternative locations and may receive a different type of service than previously offered. Travel costs could become a barrier to access and, if this is the case, this could affect their ability to access the support required when needed.

An example of the consultation responses received is provided here:

“The Millmead Centre now stands as an important community hub that helps many poor and deprived households connect with services that can help them. If you remove the services from this

hub, I strongly doubt any significant number would reengage with other outposts.”

15–19-Year-Old Parents

Our usage data shows that at in 2023, 56 parents aged 15-19 accessed Millmead centre and 151 parents aged 15-19 accessed the Seashells centre.

Making an assumption that all of the 0-24 year olds that responded to the consultation were doing so as parents of young children (as opposed to responding as young people in their own right) then 8% of respondents were parents below the age of 24.

Health outcomes for babies of teenage parents are well acknowledged to be worse than their counterparts, so access to Family Hub services for these parents and their children will be especially important to support good outcomes for their babies and/or children. The impact of further journey times may have a greater impact on this cohort as they are less likely to hold driving licences and will be more reliant on family and friends or public transport and walking to travel to access services.

As teenage parents are likely to be more reliant on the services on offer from Family Hubs, there is likely to be a larger impact on them and their children if they are unable to access a centre, exacerbating existing inequality of outcomes. It was demonstrable in the feedback that many respondents utilise a range of Family Hub services from the current centres, for example they may attend healthy baby clinics as well as the parenting programmes.

Elderly Parents / Carers (65+)

Our usage data from 2023 shows that 15 elderly parents/carers aged 65+ accessed Millmead centre and 15 parents aged 65+ accessed the Seashells centre.

Older parents/carers may be disparately affected as they may have increased mobility needs and experience greater difficulty travelling to alternative provision. They may also face more difficulty engaging with our digital offer making them more reliant on our outreach provision.

c) Mitigating Actions for age

The Family Hub digital offer, as it continues to develop will reduce the need to travel to access some support and guidance, as it provides resources for service users that can be access at any time. It is also true that the Family Hub buildings are all accessible regardless of age.

As set out in the introductory sections the hours of service provision delivered under the contracts (9 hours per week at Millmead and 14 hours per week at Seashells) can be accommodated within the alternative locations. Therefore it is proposed that the provision will remain sufficient to meet local need, and that assistance in accessing the service from alternative locations is the main mitigating factor.

Our Community Development Workers will be of particular benefit in mitigating the change in access arrangements for the service.

	<p>These officers will work with families if necessary to help ease the transition to accessing services in the new area, by helping them navigate to and through the alternative locations and ensuring they understand the services available to them at the new centres.</p> <p>This is considered to be particularly beneficial for the parents aged 15-19 as this group may require additional support in understanding and accessing the full range of services that they may need as young people and as young parents. If the need is considered to be great enough then we may consider looking at specific support groups for parents in this age group.</p> <p>Millmead Alternative provision is proposed at Cliftonville Family Hub, Margate Family Hub and Northdown Road Family Hub (1.3 miles, 1.4 miles and 1.5 miles away respectively). We can manage timetabling and scheduling of activities so that it considers when children, young people and families are available based on their age range and based on the local transport network. This will result in sessions being available for residents that need to travel, ensuring that services remain accessible.</p> <p>The cost of bus fares was raised by numerous consultees as a barrier to accessing the services if they moved to alternative locations. As a specific response to feedback within the consultation about accessibility of the other centres, KCC is considering reimbursing service users for bus fares paid to access the new locations (if they were previously accessing services at Millmead). It is proposed that the provision is sufficient to meet local need, and the mitigation is intended to guard against any drop off in service access as a result of the change of location.</p> <p>Seashells The alternative provision proposed is at the Sheppey Gateway which is approximately a five-minute walk away. This location will be closer than the existing Seashells centre for some residents and further away for others. However, the impact of the short additional distance is considered mitigated by the provision of the services at the Gateway.</p> <p>Parent Carer Panels will seek to engage and include a wide range of parents and carers at the different end of the age range to ensure inclusivity. The feedback from these groups will help continue to shape the service offer as it evolves over time.</p>
<p>d) Responsible Officer for Mitigating Actions – Age</p>	<p>Family Hub Service Managers.</p>
<p>20. Negative Impacts and Mitigating actions for Disability</p>	
<p>a) Are there negative impacts for Disability? <i>Answer: Yes/No (If yes, please also complete sections b, c, and d).</i></p>	<p>Yes</p>
<p>b) Details of Negative Impacts for Disability</p>	<p>We recognise that individuals with disabilities may need to access services differently, may need to travel to alternative locations and may receive a different type of service than previously offered.</p>

Travel could become a barrier to access and, if this is the case, this could affect their ability to access the support required when needed.

According to service user data from the year 23/24, there were 217 service users with Special Educational Needs accessing Seashells and 93 service users with Special Educational Needs accessing Millmead.

Of the consultees providing feedback, 18% indicated that they have a disability. 7% indicated that they have a physical impairment, 9% indicated a mental health condition and 4% indicated a learning disability.

10% of respondents commenting on Seashells and 16% commenting on Millmead raised the impact of the loss of the centre on those with physical disabilities.

Physical Disabilities

The proposal to not renew the commissioned contracts may adversely affect children with disabilities living within these catchment areas or children with parents with a disability, where they are required to travel further away to access services. Families with disabilities may find it harder to travel beyond immediate home locality due to having no transport and a greater reliance on public transport. Even where public transport links do exist, those with disabilities may still find it harder to access via public transport. This may be for mobility reasons, in the case of a physical disability where the requirement to travel by public transport is more challenging. Additionally, children with SEND may find increased journey times distressing.

An example of the feedback received during the consultation is as follows:

“Please consider the access for those who cannot walk long distances and for those with communities that would mean getting to another service would be an impossible mission.”

Where accessing a Family Hub is more difficult, families may access support less frequently or not at all, potentially having an impact on both the parent and the child’s wellbeing. The Health Visiting mandated checks are an exception to this where the frequency will not be impacted by accessibility of services.

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 existing inequality may be compounded by increased difficulty accessing services, resulting in a disproportionate impact.

Service users with physical disabilities may have different needs from the physical environment such as for accessible toilets, hearing loops, ramps and other accessible features. Whilst the alternative locations are accessible, any lack of these features may

impact how comfortable residents with disabilities may be accessing services.

They may need to travel further or access a toilet within the local community.

Changes to buildings, staffing, timings, and the addition of co-located staff may be a challenge for some children young people and adults who struggle with change by the nature of their disability. New environments and the level of activity in those environments (for example, as a result of co-location and integration of services at the Sheppey Gateway) could also adversely affect those groups.

Mental Illness / Anxiety Disorders

5% of respondents commenting on Seashells and 1% commenting on Millmead raised the impact of the loss of the centres on Mental Health.

Our proposal to not renew the commissioned contracts may adversely impact those struggling with mental health and anxiety issues. They may be more sensitive to change and be more distressed than their counterparts by the need to access services from a different location.

Similarly, families with higher levels of anxiety may also find the need to access alternative provision more distressing. If not managed well, it is possible that some families will stop accessing our services, potentially exacerbating existing conditions.

SEND

Service users with SEND or sensory conditions will likely have different and more complex needs. Our usage data from 2023 shows that 96 people (3.1% of all users) with SEND requirements accessed Millmead centre and 229 people (5.5% of all users) with SEND requirements accessed the Seashells centre.

8% of respondents commenting on Seashells and 4% commenting on Millmead raised the impact of the loss of the centre on those with SEND.

An example of the feedback received during the consultation is as follows:

“Many of these families are also coping with additional challenges, such as SEND, disabilities, and mental health issues making it essential that services are easily accessible and free from barriers. Changes to the location, staff, or structure of services would place further strain on those who may experience increased distress from having to access services in a new, unfamiliar location with unfamiliar staff.”

c) Mitigating Actions for Disability

In relation to Millmead, the service offer at the alternative sites proposed (Cliftonville Family Hub, Margate Family Hub and Northdown Road Family Hub) already include SEND focussed sessions. Therefore, the impact of the greater distance to travel is somewhat mitigated by the availability of additional SEND services at these locations.

	<p>The cost of bus fares was raised by numerous consultees as a barrier to accessing the services if they moved to alternative locations. As a specific response to feedback within the consultation about accessibility of the other centres, KCC is considering reimbursing service users for bus fares paid to access the new locations (if they were previously accessing services at Millmead). It is proposed that the provision is sufficient to meet local need, and the mitigation is intended to guard against any drop off in service access as a result of the change of location.</p> <p>In regards to Seashells, the Family Hub offer at the Sheppey Gateway will be able to include SEND focussed sessions as dictated by local need. The alternative venue is close to the existing Seashells location and is accessible.</p> <p>Our Family Hubs, by working as part of the SEND Transformation Programme, will be able to further improve and develop our inclusion practice.</p> <p>The alternative sites proposed are all accessible with ramp access, lifts where required and disabled toilet/changing facilities.</p> <p>Staff within the alternative locations, including staff from other services within the Gateway location can be trained and encouraged to support residents with wayfinding within the new sites to help users that are unfamiliar with the buildings or who may struggle with new settings to access the services they need.</p> <p>Our Community Development Workers will be of particular benefit in mitigating the change in access arrangements for the service. These officers will work with families if necessary to help ease the transition to accessing services in the new area, by helping them navigate to and through the alternative locations and ensuring they understand the session available to them at the new centres.</p>
<p>d) Responsible Officer for Mitigating Actions - Disability</p>	<p>Family Hub Service Managers.</p>
<p>a) Are there negative impacts for Sex? Answer: Yes/No (If yes, please also complete sections b, c, and d).</p>	<p>Yes</p>
<p>b) Details of Negative Impacts for Sex</p>	<p>Our usage data shows that in 2023 1,997 females accessed the Millmead centre, while 1,029 males accessed the same centre. Our data also shows that in 2023, 2,861 females accessed the Seashells centre while 1,525 males accessed the same centre.</p> <p>The consultees were 64% female, which lends more weight to the assumption that females may be disproportionately affected as they are most likely to access our services currently. As such we need to recognise that women may be negatively impacted by the proposal to not renew the commissioned contracts.</p> <p>As set out above any barriers to access may lead to poorer outcomes for women. For example, if they do not access the services available at Family Hubs when they need them it could</p>

lead to diminished parent-infant relationships and perinatal mental health if the change is not mitigated effectively.

As the consultation report sets out, there was little in the way of feedback that directly raised the impacts on sex, however the overall perceived loss and the impact generally was raised consistently.

An example of the feedback received during consultation is as follows:

“During my first pregnancy I was struggling to get out the house as I didn’t have friends that had a young baby as well. My mental health was struggling. The health visitor suggested Seashells to me. I struggle with social anxiety, but my husband encouraged me to go and came with me. Whilst there I met a group of 4 women all with babies of a similar age. 2 year later we are all still friends and our babies; now toddlers are still friends. We still use seashells as much as we are able to. I have since had twins, and again Seashells has saved my mental health postpartum. I honestly don’t know what I would have done without them and the groups.”

Our proposals would require residents to access services at alternative locations. In the case of the Millmead proposal, this would require a journey of 1.3, 1.4 or 1.5 miles to the nearest alternative centres. We would expect that most people would require public transport to make these journeys.

At Seashells, the alternative provision is a five-minute walk from the current location.

The crossover with other protected characteristics, including age, disability, pregnancy and those with carers’ responsibilities is likely to be greater as the impact on these protected characteristics would combine. For example, a mother with a disability will likely experience greater impact from the proposal given the additional difficulty that accessing the alternative locations may present.

c) Mitigating Actions for Sex

In relation to Millmead, the service offer will be provided at alternative sites, (Cliftonville Family Hub and Margate Family Hub) which will include sessions run by partners. Therefore the impact of the greater distance to travel is somewhat mitigated by the availability of additional services at these locations.

The cost of bus fares was raised by numerous consultees as a barrier to accessing the services if they moved to alternative locations. As a specific response to feedback within the consultation about accessibility of the other centres, KCC is considering reimbursing service users for bus fares paid to access the new locations (if they were previously accessing services at Millmead). It is proposed that the provision is sufficient to meet local need, and the mitigation is intended to guard against any drop off in service access as a result of the change of location.

In regards to Seashells, the Family Hub offer at the Sheppey Gateway will be able to include other sessions as dictated by local

	<p>need. The Gateway already provides other services, such as birth registrations, allowing women to access services in an area with which they are familiar. The alternative venue is close to the existing Seashells location and is accessible and will be able to accommodate breast feeding areas.</p> <p>Our Community Development Workers will be of particular benefit in mitigating the change in access arrangements for the service. These officers will work with families if necessary to help ease the transition to accessing services in the new area, by helping them navigate to and through the alternative locations and ensuring they understand the services available to them at the new centres.</p> <p>Specific plans as part of the wider implementation of the Family Hub transformation (not specifically linked to this proposal) to increase the Infant Feeding support for mums in Swale and Thanet, due to the higher rates of deprivation and lower prevalence of breastfeeding in these areas, means that additional support will be provided that is accessible for mums impacted by this proposal.</p>
<p>d) Responsible Officer for Mitigating Actions - Sex</p>	<p>Family Hub Service Managers.</p>
<p>22. Negative Impacts and Mitigating actions for Gender identity/transgender</p>	
<p>a) Are there negative impacts for Gender identity/transgender? <i>Answer: Yes/No (If yes, please also complete sections b, c, and d).</i></p>	<p>No – consultees did not raise any specific impacts related to this protected characteristic.</p>
<p>b) Details of Negative Impacts for Gender identity/transgender</p>	<p>N/A</p>
<p>c) Mitigating actions for Gender identity/transgender</p>	<p>N/A</p>
<p>d) Responsible Officer for Mitigating Actions - Gender identity/transgender</p>	<p>N/A</p>
<p>23. Negative Impacts and Mitigating actions for Race</p>	
<p>a) Are there negative impacts for Race? <i>Answer: Yes/No (If yes, please also complete sections b, c, and d).</i></p>	<p>Yes</p>
<p>b) Details of Negative Impacts for Race</p>	<p>Our usage data shows that residents who accessed the services at the two centres in 2023 are by a vast majority white British (62.7% at Millmead and 87.7% at Seashells). However the data shows that there are smaller groups of service users from ethnically diverse backgrounds accessing each centre, although no single group represents over 1% of the total usage of the centres.</p> <p>These statistics are backed up by the consultation response data which demonstrates that of the consultees responding, 66% indicated that they were White British. 24% chose not to answer the questions, while 4% indicated that they were ‘Other’. No other identified group had a higher response rate than 1% of all respondents.</p> <p>Notwithstanding the above, it is still true that people whose first language is not English may find it more difficult to understand the changes being proposed or understand how to access or apply for</p>

	<p>targeted support in the future. They may be more reliant on local access points.</p> <p>We also recognise that some ethnic minority families may not feel that the services are available to cater for their specific cultural needs.</p>
c) Mitigating Actions for Race	<p>As a general principle, the entire service will provide support to residents that will need to access services from different locations.</p> <p>The introduction of the Community Development leads across the county will help assist residents from ethnic minorities to help them access the services they need. The Community Development Workers are responsible for helping to engage traditionally hard-to-reach communities and broadening the network of services available within Family Hubs in line with the needs of the communities. These officers could work with the users within the existing centres to help support their transitions to the new centres.</p> <p>One particular mitigation worth highlighting here is the introduction of specific cultural awareness training related to Gypsy and Roma Traveller communities planned for early 2025. This training will empower the relevant Family Hub staff to better understand and meet the needs of these communities.</p>
d) Responsible Officer for Mitigating Actions - Race	Family Hub Service Managers.
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 – consultees did not raise any specific impacts related to this protected characteristic.
b) Details of Negative Impacts for Religion and belief	N/A
c) Mitigating Actions for Religion and belief	N/A
d) Responsible Officer for Mitigating Actions - Religion and belief	N/A
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 – consultees did not raise any specific impacts related to this protected characteristic.
b) Details of Negative Impacts for Sexual Orientation	N/A
c) Mitigating Actions for Sexual Orientation	N/A
d) Responsible Officer for Mitigating Actions - Sexual Orientation	N/A
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).	Yes
b) Details of Negative Impacts for Pregnancy and Maternity	As identified in earlier sections of this analysis, consultees were 64% female and 54% of consultees indicated that they have

children between the ages of 0 and 5 years old. The generally accepted assumption is that women that are pregnant or that are in maternity may be disproportionately affected as they are most likely to access our services currently.

As the consultation report sets out, there was little in the way of feedback that directly raised the impacts on pregnancy and maternity specifically, however the overall perceived loss and the impact generally was raised consistently. This may be due to the fact that a vast number of users of the centre are typically either pregnant or within maternity and so the impact of the changes on those that are pregnant or in maternity are perceived as the general impacts of the change.

We recognise that expectant mothers may need to access services differently. We have set out previously that the services outside of the commissioned Family Hub contracts (including NHS Health Visiting and Midwifery) will be unaffected by the proposal to not renew the commissioned Family Hub contracts. It is worth noting that responses have been received from both NHS Health Visiting colleagues and NHS Maternity services and they have outlined the impact they believe the proposals could have on their services – these are detailed further in the consultation report.

Pregnant women, or women in maternity may need to travel to multiple locations if they chose to continue to access NHS support at the existing centres, while attending wider Family Hub services at one of the proposed alternatives.

Perinatal mental health and Infant Feeding support is of particular importance for these groups. If the proposals result in a drop in women accessing these services then it is likely that women will suffer poorer outcomes in terms of their perinatal mental health.

Travel costs and accessibility could become a barrier to access. For example, if locations do not have sufficient facilities for pregnant women and those with young children (baby change, breastfeeding areas) then these residents may choose not to access the services. If this is the case, then without mitigations this could lead to poorer outcomes for these parents in terms of their own health and wellbeing and that of their children. Equally, the use of public transport for these groups will likely present more of a challenge, with cost already having been acknowledged as a potential barrier.

c) Mitigating Actions for Pregnancy and Maternity

As stated previously, the most relevant services to these groups (those provided by the NHS Health Visiting And Maternity services) are unaffected by the proposal not to renew the Family Hubs commissioned contract. Women will still be able to access these services in the current locations.

In relation to Millmead, women will also be able to access these services from the other Family Hub locations in Margate (as they can currently). These locations have benefited from investment through the Family Hub Transformation grant to make them breastfeeding friendly spaces.

	<p>As noted above, costs for public transport have been highlighted as a likely barrier to access. As a specific response to feedback within the consultation about accessibility of the other centres, KCC will consider how we could subsidise bus fares for residents travelling to the alternative locations within Margate.</p> <p>Specific plans to increase the Infant Feeding support for mums in Swale and Thanet, due to the higher rates of deprivation and lower prevalence of breastfeeding in these areas, means that additional support will be provided that is accessible for mums impacted by this proposal.</p>
<p>d) Responsible Officer for Mitigating Actions - Pregnancy and Maternity</p>	<p>Family Hub Service Managers.</p>
<p>27. Negative Impacts and Mitigating actions for marriage and civil partnerships</p>	
<p>a) Are there negative impacts for Marriage and Civil Partnerships? <i>Answer: Yes/No (If yes, please also complete sections b, c, and d).</i></p>	<p>No – consultees did not raise any specific impacts related to this protected characteristic.</p>
<p>b) Details of Negative Impacts for Marriage and Civil Partnerships</p>	<p>N/A</p>
<p>c) Mitigating Actions for Marriage and Civil Partnerships</p>	<p>N/A</p>
<p>d) Responsible Officer for Mitigating Actions - Marriage and Civil Partnerships</p>	<p>N/A</p>
<p>28. Negative Impacts and Mitigating actions for Carer’s responsibilities</p>	
<p>a) Are there negative impacts for Carer’s responsibilities? <i>Answer: Yes/No (If yes, please also complete sections b, c, and d).</i></p>	<p>Yes</p>
<p>b) Details of Negative Impacts for Carer’s Responsibilities</p>	<p>As set out previously, 63% of consultation respondents indicated that they have children (and therefore caring responsibilities) whilst 18% indicated specifically that they were carers.</p> <p>The proposal to not renew the commissioned services and relocate the services to alternative venues could impact carers and their ability to access provision.</p> <p>Alternative sites may be prohibitive for those with caring responsibilities as they may struggle to access the alternative locations easily. This may be particularly pertinent for young carers that may be more likely to rely on public transport and that have limited other options.</p> <p>An example of the feedback received from the consultation is as follows:</p> <p><i>“Being a parent and Carer who has always made use of sure start Millmead, I feel the centre would be a HUGE loss to the residents, who would be unlikely to travel to the other venues. Depriving children & families of vital support that’s been available for over 20 years.”</i></p>

	<p>As a result of these proposals carers may need to access services differently, may need to travel to alternative locations and may receive a different type of service than previously offered. Travel costs and accessibility could become a barrier to access and, if this is the case, this could affect their ability to access the support required when needed.</p> <p>The crossover with other protected characteristics, including age, sex and disability, needs considering as the impact on these protected characteristics combined would be greater.</p>
<p>c) Mitigating Actions for Carer's responsibilities</p>	<p>In relation to Millmead, the service offer will be provided at alternative sites, (Cliftonville Family Hub, Margate Family Hub and Northdown Family Hub) which will include sessions run by partners. Therefore, the impact of the greater distance to travel is somewhat mitigated by the availability of additional services at these locations.</p> <p>As noted above, costs for public transport have been highlighted as a likely barrier to access. As a specific response to feedback within the consultation about accessibility of the other centres, KCC will consider how we could subsidise bus fares for residents travelling to the alternative locations within Margate.</p> <p>In regards to Seashells, the Family Hub offer at the Sheppey Gateway will be able to include other sessions as dictated by local need. The Gateway already provides other services, such as birth registrations, library services and Citizens Advice. The alternative venue is close to the existing Seashells location and is accessible and will be able to accommodate breast feeding friendly areas.</p> <p>The introduction of the Community Development leads across the county will help assist residents to make the transition to accessing services from new locations. These officers could work with the users within the existing centres to help support their transitions to the new centres.</p>
<p>d) Responsible Officer for Mitigating Actions - Carer's Responsibilities</p>	<p>Family Hub Service Managers.</p>