

**KENT COUNTY COUNCIL  
EQUALITY ANALYSIS / IMPACT ASSESSMENT (EqIA)**

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**Directorate:** Social Care, Health and Wellbeing

**Name of policy, procedure, project or service**

NEET Support Service – a new service being commissioned to support young people who are Not in Education, Employment or Training (NEET)

**What is being assessed?**

Change from 16-18 year olds at risk of NEET or are NEET and those up to 25 years with SEND, to, 16-18 year olds that have been NEET for 12 weeks or more, or those that have multiple NEET episodes and those up to 25 years with SEND.

**Responsible Owner/ Senior Officer**

Allison Esson – EHPS Commissioning Officer

**Date of Initial Screening**

April 2016

**Date of Full EqIA:**

<b>Version</b>	<b>Author</b>	<b>Date</b>	<b>Comment</b>
1	Becca Pilcher	29.04.16	Initial draft
2	Charlotte Rayfield	22.07.16	Development of Draft
3	Allison Esson	25.07.16	Updates
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Screening Grid

Characteristic	Could this policy, procedure, project or service, or any proposed changes to it, affect this group less favourably than others in Kent? YES/NO If yes how?	Assessment of potential impact		Provide details: a) Is internal action required? If yes what? b) Is further assessment required? If yes, why?	Could this policy, procedure, project or service promote equal opportunities for this group? YES/NO - Explain how good practice can promote equal opportunities
		Positive	Negative	Internal action must be included in Action Plan	If yes you must provide detail
<b>Age</b>	<b>Yes</b> – The current NEET service supports those individuals who are or at risk of being NEET. The proposed service will focus on those individuals who have been NEET for 12 weeks or more. Those 16-18 year olds who are at risk of NEET on a shorter term basis will be supported by the wider Early Help teams.	LOW	LOW	a) No b) No	<b>Yes (for all protected characteristics)</b>  This commissioning exercise will result in a consistent service offer regardless of protected characteristics, because the service will address NEETs on an individual basis, so all service users are supported in the most suitable way.
<b>Disability</b>	<b>No</b> – It is believed that these changes will not affect this group less favourably.  Any changes will ensure that these young people can continue to access the service that they require.	NONE	NONE	a) Protected characteristics data needs to be collected for service users to assess impact. b) No	The changes should mean that young people who are NEET will be supported from one service.  It is proposed that a new NEET Support Service will achieve better outcomes in the following areas: a) Education: Children and Young People in Kent get the best start in life b) Children who need help: Provide support for children
<b>Gender</b>	<b>Yes</b> – The current service currently has a stronger male bias for service users. The new service will continue	NONE	NONE	a) No internal action or further assessment required. This data will	

	to support all genders; Males: January 836 and April 1442 (CXK data) Females: January 780 and April 1042 (CXK data)			continue to be collected throughout the new service. b) No	and young people and families who are at risk of having poor outcomes in their lives c) Out of work or risk of financial exclusion: Encouraging work and making work pay
<b>Gender identity</b>	<b>Unknown</b> – there is currently no data available to establish this.	UNKNOWN	UNKNOWN	All new service provision will be required to be accessible to all service users and service providers. Providers will need to be aware of gender identity and ensure service users are not treated less favourably as a result.  Internal action is required to ensure that this data is collected in the future as part of the review of future services.	Through the evaluation process providers will be expected to evidence and demonstrate that they do not discriminate directly or indirectly against any person because of their gender, age, disability, race, ethnic origin, language, political beliefs, trade union memberships (or non-membership), marital status or sexual orientation.
<b>Race</b>	<b>No</b> – The majority of service users are White British with Gypsy Roma second and this is representative of the wider Kent population. <sup>1</sup>  This commissioning exercise aims to provide consistent service offer regardless of this protected characteristic and therefore provide	LOW	NONE	No internal action or further assessment required  Service provision across other Early Help Services is currently accessed by a low proportion of individuals from BME groups.	Service providers must have an equalities and diversity policy in place for Staff and Service Users. The Service Provider must make available the equalities and diversity policy to Staff and Service Users at the earliest opportunity, using whatever format is most suitable.

<sup>1</sup> NEET jan16 16-18 12 weeks pivot and CXK caseloads April 2015

	<p>fair access for all.</p>			<p>Detail of current services and service users can be found in Appendix 1</p> <p>This data will continue to be collected throughout the new service.</p>	<p>Failure by Service Providers to comply with the requirements will constitute a material breach of the Service Provider's obligations.</p> <p>KCC will monitor and review the services regularly in line with performance indicators outlined in the Contract Management Schedule.</p>
<p><b>Religion or belief</b></p>	<p><b>Unknown</b> – there is currently no data available to establish this.</p> <p>However it is anticipated that any changes to the service would not impact this protected characteristic. Services will address needs of the individual.</p>	<p>UNKNOWN</p>	<p>UNKNOWN</p>	<p>The NEET Support Service is open referrals for all young people. Providers will need to be aware of different religions and cultures that their workers may be working with and must ensure that their staff do not discriminate and are knowledgeable and act sensitively to the beliefs of their service users.</p> <p>Detail of current services and service users can be found in Appendix 1</p> <p>Internal action - Build into spec that staff should be aware of ranges of cultures and religions.</p>	

				No further assessment required	
<b>Sexual orientation</b>	<p><b>Unknown</b> – there is currently no data available to establish this.</p> <p>However it is anticipated that any changes to the service would not impact this protected characteristic. Services will address needs of individual.</p>	UNKNOWN	UNKNOWN	<p>No internal action or further assessment required</p> <p>Detail of current services and service users can be found in Appendix 1</p> <p>It is largely unknown what percentages of individuals from this protected characteristic are accessing any of the Early Help (NEET) Services. Service providers are asking the questions (where appropriate) of service users but on average 98% do not disclose.</p>	
<b>Pregnancy and maternity</b>	<p><b>No</b> – the NEET Support Service will support young people who are pregnant or are parents Data from the current service shows that 6% were pregnant in January 2016 and CXK worked with 3% teenage parents in April 2016. <sup>2</sup></p>	LOW	NONE	<p>No internal action or further assessment required</p> <p>This data will continue to be collected throughout the new service.</p>	

<sup>2</sup> NEET jan16 16-18 12 weeks pivot and CXK caseloads April 2015

<p><b>Marriage and Civil Partnerships</b></p>	<p><b>Unknown</b> – there is currently no data available to establish this.</p> <p>However it is anticipated that any changes to the service would not impact this protected characteristic. Services will address needs of individual.</p>	<p>UNKNOWN</p>	<p>UNKNOWN</p>	<p>No internal action or further assessment required</p> <p>The NEET Support Service is open to all and individuals will not be positively or negatively discriminated due to marriage or civil partnership.</p>	
<p><b>Carer's responsibilities</b></p>	<p><b>No</b> – the NEET Support Service will not impact on Young Carers who access the service but we need to ensure these are supported. Data shows that 1% of young people who accessed the existing service had carer's responsibilities in January 2016 and 0.5% of the current provider's caseload were Young Carers April 2016. <sup>2</sup></p>	<p>LOW</p>	<p>LOW</p>	<p>No internal action or further assessment required</p> <p>The NEET Support Service will be supporting children and young people identified as young carers to access suitable provision.</p>	

## Part 1: INITIAL SCREENING

**Proportionality** - Based on the answers in the above screening there would be a low weighting as initial screening suggests that none of the protected characteristics will suffer a disproportionate level of either positive or negative discrimination due to the change or potential removal of services.

Low	Medium	High
Low relevance or Insufficient information/evidence to make a judgement.	<del>Medium relevance or Insufficient information/evidence to make a judgement.</del>	<del>High relevance to equality, likely to have adverse impact on protected groups</del>

In addition to this, there will be little change to front line service provision with regards to the protected characteristics.

### Context

#### What services are we currently providing to NEETs?

There is currently a participation contract in place which offers support to those young people who are NEET (Not in Education, Employment or Training).

The current service is accessed via data sets supplied by Kent County Council that captures where a young person is enrolled on either a course or in employment. Referrals can also be made via an Early Help Notification, youth practitioners, schools or colleges etc. Self-referrals are also accepted from either the young person or a family member.

The Contract is now ending (30<sup>th</sup> November 2016) and the new NEET Support Service will start in December 2016. The current contract has a total a budget of approx. £1.2million per annum. The new service has a budget of £500K per annum.

#### What changes are we proposing?

The current contract will end in November 201 and the new NEET Support Service will start in December 2016, with no gap in service provision.

Access to the new service will be via referral from the Early Help Units and the District teams. Any Early Help Notification will have been completed for all young people that access the service. Decisions on allocations are made by

Early Help Managers on an assessment of need from the information provided on the Early Help Notification. Service users do not decide which service they are referred to.

The new service will offer a different target audience and range of support which could impact on the current service users.

### **Aims and Objectives**

The aims and objectives are to improve the life chances and outcomes for children, young people and their families in the areas that are a focus in the Troubled Families Programme:

- d) Crime and anti-social behaviour: Cut crime and catch criminals (this priority includes anti-social behaviour) –Kent Police
- e) Education: Children and Young People in Kent get the best start in life – KCC Strategic Outcomes Framework
- f) Children who need help: Provide support for children and young people and families who are at risk of having poor outcomes in their lives – Early Help Strategy and Three Year Plan
- g) Out of work or risk of financial exclusion: Encouraging work and making work pay - DWP priorities
- h) Domestic abuse: Work in partnership to obtain the best outcomes for those affected by domestic abuse and their families. Kent and Medway Domestic Abuse Strategy

Health: Ensure a healthy standard of living for all – KCC Public Health

The NEET contract will specifically focus on objective 'G' - Out of work or risk of financial exclusion: Encouraging work and making work pay

### **Beneficiaries**

The intended beneficiaries for all Early Help and Preventative Services are children and young people aged 0-25 in Kent and their families. However the NEET Service will be specifically focusing on those young people aged 16-25 that have been NEET for 12 weeks or more

### **Information and Data**

#### **Demographic Summary:**

Data has been gathered from the Early Help quarterly service reviews to look specifically at which of the protected characteristics are accessing the current service provision (for a full break down please see Appendix 1).

#### **Involvement and Engagement**

The stakeholder analysis comprised:

- Children and young people workshops aimed to better understand their needs and the issues that concern them.
- Workshop to identify and prioritise the local perception of need at District level and where EHPS external arrangements need to focus, Including
  - Emotional Health and Wellbeing



- Family Centred approaches
- Youth Offer
- Domestic violence
- Market engagement took place in the form of meetings between commissioners and current providers. These meetings gave the opportunity to discuss what a holistic family support service could look like, and what the providers feel should be delivered. Provider feedback was (full feedback can be found in Appendix 2):
  - Supportive of a service that could support families in a holistic way and of having four area contracts.
  - They were not deterred by the idea of collaborating, and many appreciated some of the opportunities to network at market engagement events.
- Engagement with Early Help Area Managers and Early Help District Managers through Area Team Meetings to discuss the need for additional capacity within the existing units to focus and support design of the new service.

### **Potential Impact**

We do not foresee any negative impacts on any protected characteristics at this stage, but will keep these under review throughout the development of any service design and future delivery.

## **JUDGEMENT**

### **Option 3 – Full Impact Assessment**

The changes suggested will have minimal impact on service users; the current services will no longer exist but outcomes will be more achievable through a whole family approach with the option of continued 1:1 support through mentors.

### **Action Plan**

*Please see attached plan*

### **Monitoring and Review**

Monitoring of the EqIA and Action plan will take place at provider contract monitoring.

In addition to this, the Early Help and Preventative Services Commissioning Team will develop a monitoring process that will include a robust approach to collecting and collating equality data to support the understanding of who is using the service.

**Sign Off**

I have noted the content of the Equality Impact Assessment and agree the actions to mitigate the adverse impact(s) that have been identified.

**Senior Officer**



Signed:

Name: Helen Cook

Job Title: Commissioning Manager – EHPS - Childrens

Date: 26.07.16

**DMT Member**



Signed:

Name: Florence Kroll

Job Title: Director of Early Help and Preventative Services

Date: 26.07.16

**Equality Impact Assessment Action Plan**

<b>Protected Characteristic</b>	<b>Issues identified</b>	<b>Action to be taken</b>	<b>Expected outcomes</b>	<b>Owner</b>	<b>Timescale</b>	<b>Cost implications</b>
<b>All</b>	Equalities Monitoring information needs to be strengthened over the longer-term within service specification and performance monitoring schedules	Implementation of a robust, structured and uniformed performance measure for Early Help services that will include quality assurance and data monitoring to ensure all protected characteristics are represented and considered in service provision	<b>Improved performance monitoring and lessons learnt for future commissioning.</b>	<b>Early Help and Preventative Services Commissioning</b>	<b>Set up in advance of contract commencement date</b>	<b>N/A</b>
<b>Religion and belief</b>	The Family Support workers will be working with any family that is referred and meets the criteria for the service. Workers need to be aware of cultural differences and	There will be an expectation that staff will be trained in equalities and diversity and this will be included within the training audit and subsequent staff development	All front line staff will be trained in equalities and diversity so that they are able to support families who may have different beliefs, religions and cultures to their own and this will	<b>Early Help and Preventative Services Commissioning</b>	<b>Within 6 months of contract commencement</b>	<b>Cost for provider but many free courses are available</b>

	have an understanding of acceptable behaviour to protect themselves and to ensure that the service does not discriminate any family.	plans that the provider will be supported to completed.	support the family achieve improved life outcomes.			
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Equalities data (2014) of current Early Help and Preventative Services compared to Early Help Notification		Early Help Notifications received 1 April 2015 – 31 December 2015	Adolescent Support Workers	Domestic Abuse North, South	Domestic Abuse East, West	Family Mediation	Intensive Family Support East, South	Intensive Family Support North, West	FIP and FIP Light (based on April 2016 data)	Average (not including EHN)
Participants that consider themselves disabled (as a percentage)		28.9%	33%	0.0%	3%	1.0%	19.8%	10.6%	Not recorded	11%
<b>Gender</b>	Male	52.5%	58%	45%	62%	42%	48%	36%	Not recorded	49%
	Female	42.2%	42%	55%	38%	58%	52%	37%	Not recorded	47%
	Other	0%	0%	0%	0%	0%	0%	0%	Not recorded	0%
	Undisclosed	5.4%	0%	0%	0%	0%	0%	27%	Not recorded	5%
<b>Ethnicity</b>	White British	70.7%	95.4%	75%	81.5%	92%	92%	97%	12.1%	78%
	White Irish	0.2%	0%	0%	0%	0%	0%	0.6%	0%	0%
	White Gypsy or Irish traveller	1.2%	0.3%	0%	0%	0%	1.0%	0%	0%	0%
	Other White background	3%	0.6%	0%	3.5%	0%	2.0%	2%	0%	1%
	White and Black Caribbean	0.8%	0%	0%	7.2%	0%	0%	0%	0.1%	1%
	White and Black African	0.7%	0.9%	0%	1.4%	0%	0%	0%	0%	0%
	White and Asian	0.5%	0%	0%		0%	0%	0%	0%	0%
	Any other mixed/multiple ethnic background	0.9%	0.3%	3.2%	1.4%	0.3%	1.0%	0%	0.1%	1%
	Indian	0.3%	1.5%	0%	0%	0%	0%	0%	0%	0%
	Pakistani	0.1%	0%	0%	0%	0%	0%	0%	0.2%	0%

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	Bangladeshi	0.1%	0%	0%	0%	0%	0%	0%	0%	0%
	Chinese	0.1%	0%	0%	0%	0%	0%	0%	0%	0%
	Any other Asian background	0.4%	0%	0%	0%	0%	0%	0.2%	0%	0%
	African	0.6%	0.6%	1.6%	0%	0%		0%	0.1%	0%
	Any other black/African/Caribbean background	0.4%	0%	0%	0%	0%	2.0%	0%	0.2%	0%
	Other Ethnic group	0.7%	0%	0%	0%	0%	0%	0.2%	0.1%	0%
	Undisclosed	5.8%	0%	19.3%	5.0%	7.7%	2.0%	0%	86.9%	17%
<b>Sexuality</b>	Asexual	Not recorded	0%	0%	0%	0%	0%	0%	Not recorded	0%
	Bisexual	Not recorded	0%	0%	0%	0%	0%	0%	Not recorded	0%
	Heterosexual	Not recorded	7.0%	0%	0%	0%	27%	0%	Not recorded	6%
	Homosexual	Not recorded	0.0%	0%	0%	0%	0.0%	0%	Not recorded	0%
	Other	Not recorded	0%	0%	0%	0%	0%	0%	Not recorded	0%
	Undisclosed	Not recorded	93%	100.0%	100%	100%	16.0%	100%	Not recorded	85%
<b>Religious Orientation</b>	No religion	Not recorded	17%	0%	0%	0%	43%	10%	Not recorded	12%
	Christian (including Church of England, Catholic, Protestant and all other Christian denominations)	Not recorded	16%	0%	0%	36%	30%	13%	Not recorded	16%
	Buddhist	Not recorded	0%	0%	0%	0%	0%	0%	Not recorded	0%
	Hindu	Not recorded	0%	0%	0%	0%	0%	0%	Not recorded	0%

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	Jewish	Not recorded	0%	0%	0%	0%	0%	0%	0%	Not recorded	0%
	Muslim	Not recorded	0%	0%	0%	0%	0%	0%	0%	Not recorded	0%
	Sikh	Not recorded	0%	0%	0%	0%	0%	0%	0%	Not recorded	0%
	Any other religion	Not recorded	0%	0%	0%	0%	0%	7%	0%	Not recorded	1%
	Did not Disclose	Not recorded	86%	100%	100%	64%	27%	70%	0%	Not recorded	75%

## Appendix 2: Market Engagement

There was a set structure to market engagement meetings, the following questions were asked:

- What issues are the most common for young people who are NEET? What work do you do to support them? Are there any gaps in your skills/knowledge around particular issues? What do you do if there is a gap – refer on, bring in expertise, skill up staff?
- What interventions do you think work best for young people who are NEET?
- How do you know when to close a case – when have outcomes been achieved to a standard that is acceptable?
- Do you collect customer feedback on the service? Is there any feedback that could help inform the design of the future NEET Support Service?

The main points that came out of the market engagement are summarised below:

- NEET Support Workers understand that young people individuals who each have their own needs and outcomes to achieve
- The Service must build the resilience of the young person by linking them in with local services/building on things that they already do and ensuring connections are there.
- Specialist Children Services cases – in an ideal world providers would want to stay with young people that they have built a relationship up with (if that is what the young person wants) even if the case has been escalated but they are aware that there are cost implications.
- The service provider needs to offer something different to in-house and have the ability and freedom to be creative in their delivery with young people that are hard to engage – service specification must allow providers to evolve and be creative (otherwise we might as well keep the service in-house)
- Very close links and relationships with Early Help – either by co-locating staff, having area/district meetings, sharing skills and knowledge of local issues etc.