

Equality Impact Assessment [version 2.9]



Title: BNSSG IPBS Pilot	
<input type="checkbox"/> Policy <input checked="" type="checkbox"/> Strategy <input checked="" type="checkbox"/> Function <input checked="" type="checkbox"/> Service <input type="checkbox"/> Other [please state]	<input checked="" type="checkbox"/> New <input type="checkbox"/> Already exists / review <input type="checkbox"/> Changing
Directorate: People	Lead Officer name: Amanda Chappell
Service Area: Commissioning	Lead Officer role: Commissioning Manager

The purpose of an Equality Impact Assessment is to assist decision makers in understanding the impact of proposals as part of their duties under the Equality Act 2010. Detailed guidance to support completion can be found here [Equality Impact Assessments \(EqIA\) \(sharepoint.com\)](#).

This assessment should be started at the beginning of the process by someone with a good knowledge of the proposal and service area, and sufficient influence over the proposal. It is good practice to take a team approach to completing the equality impact assessment. Please contact the [Equality and Inclusion Team](#) early for advice and feedback.

1.1 What are the aims and objectives/purpose of this proposal?

Briefly explain the purpose of the proposal and why it is needed. Describe who it is aimed at and the intended aims / outcomes. Where known also summarise the key actions you plan to undertake. Please use [plain English](#), avoiding jargon and acronyms. Equality Impact Assessments are viewed by a wide range of people including decision-makers and the wider public.

The proposal is for a jointly commissioned Intensive Positive Behavioural Support (IPBS) pilot intervention across BNSSG, bringing together PBS best practice and learning from self-managing team (SMT) operational methodologies.

The pilot will be co-designed with providers and may involve all or a combination of advice, guidance, training, and hands on support from PBS experts.

The beneficiaries of the pilot intervention will be a small cohort of individuals, predominantly those in our 'PFA' (Preparing for Adulthood) cohort with Learning Disabilities / Autism whose behaviours have significantly challenged services across BNSSG, as well as their provider organisations. The purpose is to develop strategies and joint-working principles that lead to improved outcomes for those service users, and then to take that learning to inform development of a PBS framework across the patch.

The key aims of the project are:

- To help prevent placement breakdown when an individual's behaviour becomes exceptionally challenging. Using a personalised approach where possible (using individual service funds and shared support planning)
- To reduce reliance on costly OOA placements
- To improve service quality and effectiveness.
- To reduce or avoid excessively high placement costs.
- To contribute to placement development (i.e., employment, community inclusion and repatriation to local community housing with support) and quality improvement for commissioners, LD nurses, social workers etc.
- To provide clear pathways that are closely monitored.
- To maximise resource allocation and minimise drift, mission creep, and unnecessary dependence on specialist support.

- To develop a standardised (and culturally appropriate where necessary) approach to behaviour that is seen to challenge services across BNSSG (shared strategy and jointly commissioned IPBS framework) to Improve service quality and effectiveness
- To create opportunities to integrate IPBS outcomes into our commissioning contractual processes, and into operational practices i.e., care management; care act assessments, support planning, reviewing (including Education Health and Care Plans) quality assurance and contract performance management

1.2 Who will the proposal have the potential to affect?

<input checked="" type="checkbox"/> Bristol City Council workforce	<input checked="" type="checkbox"/> Service users	<input checked="" type="checkbox"/> The wider community
<input checked="" type="checkbox"/> Commissioned services	<input checked="" type="checkbox"/> City partners / Stakeholder organisations	
Additional comments:		

1.3 Will the proposal have an equality impact?

Could the proposal affect access levels of representation or participation in a service, or does it have the potential to change e.g. quality of life: health, education, or standard of living etc.?

If 'No' explain why you are sure there will be no equality impact, then skip steps 2-4 and request review by Equality and Inclusion Team.

If 'Yes' complete the rest of this assessment, or if you plan to complete the assessment at a later stage please state this clearly here and request review by the Equality and Inclusion Team.

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	[please select]
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1.1 2.1 What data or evidence is there which tells us who is, or could be affected?

Please use this section to demonstrate an understanding of who could be affected by the proposal. Include general population data where appropriate, and information about people who will be affected with particular reference to protected and other relevant characteristics: <https://www.bristol.gov.uk/people-communities/measuring-equalities-success>.

Use one row for each evidence source and say which characteristic(s) it relates to. You can include a mix of qualitative and quantitative data e.g. from national or local research, available data or previous consultations and engagement activities.

Outline whether there is any over or under representation of equality groups within relevant services - don't forget to benchmark to the local population where appropriate. Links to available data and reports are here [Data, statistics and intelligence \(sharepoint.com\)](#). See also: [Bristol Open Data \(Quality of Life, Census etc.\)](#); [Joint Strategic Needs Assessment \(JSNA\)](#); [Ward Statistical Profiles](#).

For workforce / management of change proposals you will need to look at the diversity of the affected teams using available evidence such as [HR Analytics: Power BI Reports \(sharepoint.com\)](#) which shows the diversity profile of council teams and service areas. Identify any over or under-representation compared with Bristol economically active citizens for different characteristics. Additional sources of useful workforce evidence include the [Employee Staff Survey Report](#) and [Stress Risk Assessment Form](#)

Data / Evidence Source [Include a reference where known]	Summary of what this tells us
<ul style="list-style-type: none"> • Bristol Population Survey 2019 • Bristol Equality Profile Disabilities (Data from 2011 Census) • Adult Social Care Tier 3 Power BI Dashboard 	<p>Ethnicity</p> <p>Of all disabled people in Bristol, 11% belong to a Black or minority ethnic (BME) group (this figure from the Equality Profile encapsulates all 'non white' groups). This compares to 16% BME in the population as a whole. The BME population generally has a younger age profile than the population as a whole and this would explain the lower levels of disability in these groups.</p> <p>In the PFA group reported on Power BI, those in the 'BME' (non-white) group represent 23%, suggesting a significant overrepresentation. Evidence suggests that autism and learning disabilities are disproportionately higher amongst some Black and minoritised groups. Therefore, comparing uptake against the 2011 census may require a more sophisticated modelling analysis to understand local prevalence within the city. This will be highlighted to our Public Health team.</p> <p>Disability</p> <p>Of the PFA cohort reported on Power BI, the significant majority (77%) are identified as having a primary support reason of Learning Disability. However, as a Local Authority, historically we do not code autism. New processes have been put in place (2020) to capture this as a primary or secondary need, but care management practitioners have been slow to complete this within their assessment and support planning processes</p> <p>Of the 39 service users without a learning disability, 5% are identified as 'Black, African, Caribbean, Black British'. In the group identified as having a Learning Disability, 10% are identified as 'Black, African, Caribbean, Black British'. This discrepancy contrasts with the group identified as 'white' which remains constant at 61% in both groups. This suggests an overrepresentation of black service users in the Learning-Disabled subset of the PFA cohort, if we are to benchmark against the 2011 census and not take into consideration the evidence suggesting higher prevalence rates within our modelling practices.</p> <p>There are significant differences in the ethnic makeup of the three localities in Bristol: North & West, Central & East, and South, with the Black, Asian and minority ethnic population making up roughly 3% in the North and South localities and 19.7% in the Central & East locality.</p> <p>Sex / Gender</p> <p>The PFA cohort is 70% male and 30% female, indicating a significant overrepresentation of males. Autism is evidenced to be higher in males.</p> <p>Sexual Orientation</p>

	There is an under-reporting or under-recording of sexual orientation in our 18-25 services. Figures from our internal data collection do not match what would be expected from the Bristol Population Survey.
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Additional comments:

1.2 2.2 Do you currently monitor relevant activity by the following protected characteristics?

<input checked="" type="checkbox"/> Age	<input checked="" type="checkbox"/> Disability	<input type="checkbox"/> Gender Reassignment
<input type="checkbox"/> Marriage and Civil Partnership	<input type="checkbox"/> Pregnancy/Maternity	<input checked="" type="checkbox"/> Race
<input checked="" type="checkbox"/> Religion or Belief	<input checked="" type="checkbox"/> Sex	<input checked="" type="checkbox"/> Sexual Orientation

1.3 2.3 Are there any gaps in the evidence base?

Where there are gaps in the evidence, or you don't have enough information about some equality groups, include an equality action to find out in section 4.2 below. This doesn't mean that you can't complete the assessment without the information, but you need to follow up the action and if necessary, review the assessment later. If you are unable to fill in the gaps, then state this clearly with a justification.

For workforce related proposals all relevant characteristics may not be included in HR diversity reporting (e.g. pregnancy/maternity). For smaller teams diversity data may be redacted. A high proportion of not known/not disclosed may require an action to address under-reporting.

There is a lack of reliable data recorded on Sexual Orientation. There is no data on marriage and civil partnership, pregnancy and maternity, and gender reassignment. There is around a 10% gap in the recording of Ethnicity and around a 5% gap in the reporting of Disability (Primary Support Reason).

In addition, during our needs assessment processes, we need to develop our skills to model population need against prevalence rates and other sources of secondary data and research to inform actual prevalence rates, so that we can ensure that all citizens with protected characteristics have equitable access and support from commissioned services. Public Health has a system leadership role in developing the joint strategic needs assessment and coordinating the health and wellbeing boards, they are aware of this gap in intelligence and will work to address this soon.

There are gaps in overall diversity data at a local and national level for some characteristics e.g. gender reassignment – especially where this has not historically been included in statutory reporting. As council we rarely monitor marriage and civil partnership. There is a corporate approach to diversity monitoring for service users and our workforce, however the quality of available evidence across various council service areas is variable.

1.4 2.4 How have you involved communities and groups that could be affected?

You will nearly always need to involve and consult with internal and external stakeholders during your assessment. The extent of the engagement will depend on the nature of the proposal or change. This should usually include individuals and groups representing different relevant protected characteristics. Please include details of any completed engagement and consultation and how representative this had been of Bristol's diverse communities. See <https://www.bristol.gov.uk/people-communities/equalities-groups>.

Include the main findings of any engagement and consultation in Section 2.1 above.

If you are managing a workforce change process or restructure please refer to [Managing change or restructure \(sharepoint.com\)](#) for advice on consulting with employees etc. Relevant stakeholders for engagement about workforce changes may include e.g. staff-led groups and trades unions as well as affected staff.

The proposals outlined in this document are at an early stage and the final delivery model will be co-produced with stakeholder advocacy and representation organisations, for example Challenging Behaviour Foundation, Bristol Disability Commission. Specific interventions offered to pilot participants will be developed in partnership

with those service users, their families, their circles of support and local community organisations to ensure that our approach aligns with our personalisation agenda.

1.5 2.5 How will engagement with stakeholders continue?

Explain how you will continue to engage with stakeholders throughout the course of planning and delivery. Please describe where more engagement and consultation is required and set out how you intend to undertake it. Include any targeted work to seek the views of under-represented groups. If you do not intend to undertake it, please set out your justification. You can ask the Equality and Inclusion Team for help in targeting particular groups.

This pilot will be subject to continual evaluation seeking feedback from the pilot participants, their carers, associated equalities groups.

Analysis of impacts must be rigorous. Please demonstrate your analysis of any impacts of the proposal in this section, referring to evidence you have gathered above and the characteristics protected by the Equality Act 2010. Also include details of existing issues for particular groups that you are aware of and are seeking to address or mitigate through this proposal. See detailed guidance documents for advice on identifying potential impacts etc. [Equality Impact Assessments \(EqIA\) \(sharepoint.com\)](#)

1.6 3.1 Does the proposal have any potentially adverse impacts on people based on their protected or other relevant characteristics?

Consider sub-categories (different kinds of disability, ethnic background etc.) and how people with combined characteristics (e.g. young women) might have particular needs or experience particular kinds of disadvantage.

Where mitigations indicate a follow-on action, include this in the 'Action Plan' Section 4.2 below.

GENERAL COMMENTS (highlight any potential issues that might impact all or many groups)

No significant negative impacts from this proposal have been identified. However, we are aware of existing issues for people based on their characteristics which this proposal should seek to address.

The commissioned service provider (whether in house, a current partner like Sirona or an external expert organisation) will be required to demonstrate through the ongoing pilot evaluation and quality assurance that they will operate in accordance with the Equality Act 2010 and the s.149 Public Sector Equality Duty; that as an employer that equality of opportunity is integral to vacancy advertising, recruitment, retention, promotion, training and grievances; and that services will be tailored and regularly reviewed to include understanding of the various service user needs, backgrounds and their differing requirements.

PROTECTED CHARACTERISTICS

Age: Young People	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	The focus of this pilot will likely be the PFA/CDS cohorts between the ages of 16-25. As such, there is the potential that any conclusions drawn omit the specific and different needs of much older individuals.
Mitigations:	The scope of this work will be limited to younger adults and the conclusions drawn from this pilot specifically will not be extrapolated to the design and delivery of services for older people without further investigation.
Age: Older People	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	These proposals do not include any work with older people. As such, if further exploration of the pilot principles are not conducted with specifically older individuals the target group, there is a risk that older people in Bristol will not have their support needs met appropriately. This would have adverse effects upon their health and wellbeing.
Mitigations:	This proposal seeks to pilot ways of working that can eventually contribute to a larger evidence base and delivery framework that can meet the needs of people of all ages with behaviours that are seen to challenge services.
Disability	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>

Potential impacts:	These proposals will have a significant impact for people with learning disabilities and/or autism. If the correct service is not identified and put in place, there is a risk that learning-disabled people in Bristol will not have their support needs met. This would have adverse effects upon their health and wellbeing.
Mitigations:	This proposal seeks to procure a commissioned service that will more effectively meet the needs of learning-disabled citizens in Bristol than services that are currently offered
Sex	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	THE EQIA has identified a significant overrepresentation of males in the pool of potential participants. There are different ways that learning disabilities, autism and associated behaviours manifest between the sexes
Mitigations:	The pilot will work with a representative number of males and females based on broader population estimates.
Sexual orientation	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	There is a lack of profile data on sexual orientation. There is no evidence that the proposals would have an adverse impact.
Mitigations:	None.
Pregnancy / Maternity	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	There is a lack of profile data on pregnancy and maternity. There is no evidence that the proposals would have an adverse impact.
Mitigations:	None.
Gender reassignment	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	There is a lack of profile data on gender reassignment. There is no evidence that the proposals would have an adverse impact.
Mitigations:	None.
Race	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	There is an overrepresentation of Black, Asian and Minority Ethnic service users in the potential pilot cohort in comparison to the general population.
Mitigations:	The proposed service specification will seek to procure services that accurately represent and appropriately meet the varying needs of the different ethnicities they support. Accurate and up to date demographic data will be used to specify the most appropriate type of service in each of the three Bristol localities. Diversity monitoring will be conducted and any diversity of outcomes will inform the development of any future services
Religion or Belief	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	There is no evidence that these proposals would have an adverse impact, however we need to ensure that providers are able to meet the religious and cultural needs of service users including through having strong links with other community organisations.
Mitigations:	None.
Marriage & civil partnership	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	There is a lack of profile data on marriage and civil partnership. There is no evidence that the proposals would have an adverse impact.
Mitigations:	None.
OTHER RELEVANT CHARACTERISTICS	
Socio-Economic (deprivation)	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	Data suggests that economically disadvantaged individuals are more likely to exhibit the kinds of behaviours that challenge services that would make them suitable for this pilot.
Mitigations:	This proposal seeks to procure a commissioned service that will meet the needs of economically disadvantaged people in Bristol.
Carers	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	These proposals will have a significant impact on the carers people with learning disabilities and/or autism. If the correct service is not identified and put in place, there

	is a risk that the carers learning-disabled people in Bristol will not have their support needs met. This would have adverse effects upon their health and wellbeing.
Mitigations:	This proposal seeks to procure a commissioned service that will effectively meet the needs of the carers of pilot participants, as well as the participants themselves. Cares will be key stakeholders and their own experience and outcomes will be evaluated throughout the pilot.
Other groups [Please add additional rows below to detail the impact for other relevant groups as appropriate e.g. Asylums and Refugees; Looked after Children / Care Leavers; Homelessness]	
Potential impacts:	None
Mitigations:	n/a

1.7 3.2 Does the proposal create any benefits for people based on their protected or other relevant characteristics?

Outline any potential benefits of the proposal and how they can be maximised. Identify how the proposal will support our Public Sector Equality Duty to:

- ✓ Eliminate unlawful discrimination for a protected group
- ✓ Advance equality of opportunity between people who share a protected characteristic and those who don't
- ✓ Foster good relations between people who share a protected characteristic and those who don't

The proposals aim to increase the availability and quality of care and support services which has clear benefits young people with learning disabilities / autism and behaviours that challenge. These services are designed to help people to stay well and live meaningful lives in a place of their choosing.

1.8 4.1 How has the equality impact assessment informed or changed the proposal?

What are the main conclusions of this assessment? Use this section to provide an overview of your findings. This summary can be included in decision pathway reports etc.

If you have identified any significant negative impacts which cannot be mitigated, provide a justification showing how the proposal is proportionate, necessary, and appropriate despite this.

Summary of significant negative impacts and how they can be mitigated or justified:

We have not identified any significant negative impact from the proposal however we will aim to address and mitigate existing disparities through ensuring there is accessible and inclusive service provision.

Summary of positive impacts / opportunities to promote the Public Sector Equality Duty:

The EQIA has highlighted the need for this pilot to:

- Ensure we commission providers that are representative and can meet the needs of the local population.
- Ensure that diversity of outcomes for people from ethnic minority backgrounds are recorded and go on to inform the development of future services.
- Ensure that diversity of outcomes for males and females are recorded and evaluated, and efforts are taken to ensure that the pilot effectively meets the needs of both sexes.
- Ensure our service specifications specify that needs assessments take account any needs in relation to the Protected Characteristics
- Consider whether equalities service standards and targets should be used in the contract specification or Performance Management Frameworks.
- Ensure that any evaluation of the pilot is clear about the highly specific targeting of the cohort and is not extrapolated to make claims or develop services aimed at different groups.
- Work alongside Public Health (who have a systems leadership role around data and intelligence across the city to inform our commissioning intentions and service delivery
- Work alongside culturally appropriate community-based services to ensure that the cultural needs of citizens who access the pilot are taken into consideration

1.9 4.2 Action Plan

Use this section to set out any actions you have identified to improve data, mitigate issues, or maximise opportunities etc. If an action is to meet the needs of a particular protected group, please specify this.

Improvement / action required	Responsible Officer	Timescale
Work alongside Public Health to identify local prevalence rates for citizens who do or do not access our commissioned services	Christina Gray	One Year
Work alongside local Black and Minority communities to ensure that our offer (including the pilot) is culturally appropriate	Penny Germon	Over the period of the pilot
As part of the evaluation better understand how iPBS improves the quality of life and outcomes for Black and Minority citizens	Helen Pitches	As above

1.10 4.3 How will the impact of your proposal and actions be measured?

How will you know if you have been successful? Once the activity has been implemented this equality impact assessment should be periodically reviewed to make sure your changes have been effective your approach is still appropriate.

The impact of this proposal and the actions will be measured through ongoing contract management and quality assurance of the contracts. In addition, the impact of the project will be measured using BCC's internal business intelligence platform to ascertain whether it has achieved its benefits.

The Equality and Inclusion Team need at least five working days to comment and feedback on your EqIA. EqIAs should only be marked as reviewed when they provide sufficient information for decision-makers on the equalities impact of the proposal. Please seek feedback and review from the Equality and Inclusion Team before requesting sign off from your Director¹.

Equality and Inclusion Team Review: Equalities Team	Director Sign-Off: 
Date: 15/11/21	Date: 16/11/2021

¹ Review by the Equality and Inclusion Team confirms there is sufficient analysis for decision makers to consider the likely equality impacts at this stage. This is not an endorsement or approval of the proposal.