

EQUALITY IMPACT ASSESSMENT FORM INCLUDING SOCIO-ECONOMIC DUTY

(Revised March 2021)

Please refer to the current Equality Impact Assessment guidance when completing this document. If you would like further guidance please contact the Diversity and Inclusion Team on 01443 444529.

An equality impact assessment **must** be undertaken at the outset of any proposal to ensure robust evidence is considered in decision making. This documentation will support the Council in making informed, effective and fair decisions whilst ensuring compliance with a range of relevant legislation, including:

- Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011
- Socio-economic Duty – Sections 1 to 3 of the Equality Act 2010.

This document will also contribute towards our duties to create a More Equal Wales within the

- Well-being of Future Generation (Wales) Act 2015.

The [‘A More Equal Wales – Mapping Duties’](#) guide highlights the alignment of our duties in respect of the above-mentioned legislation.

SECTION 1 – PROPOSAL DETAILS

Lead Officer: **Jill Bow**
 Service Area: **Adult Services**
 Date: **22th October 2023**

1.a) What are you assessing for impact?

Strategy/Plan	Service Re-Model/Discontinuation of Service	Policy/Procedure	Practice	Information/Position Statement
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

1.b) What is the name of the proposal?

Future Delivery of Day Services for Older people.

1.c) Please provide an overview of the proposal providing any supporting links to reports or documents.

The outcome of previous consultations and Cabinet decisions, and the further supporting information included in the report, have informed the proposals for the revised future service delivery model for the Council's Day Services for Older People. These proposals, which are in line with current policy direction and current and future need, are summarised below:

The integration of Trecynon Day Centre and Cwmni Dda into one day service provision. This would include relocation of service users and staff to be based within Cwmni Dda day centre in Trecynon.

The relocation of Tonyrefail service users and staff to the Day Centre to be based within Cwrt Yr Osaf, Extra Care facility in Pontypridd. This would also include the relocation of service users and staff.

Rhondda Cynon Taf County Borough Council Commissioned Practice Solutions Ltd. to undertake an independent review into residential care homes and day services for older people. The review was undertaken between January and March 2018

The review involved an initial stage of research, followed by field work, which involved visiting all the Care Homes and Day Services managed by the Council. The findings, information and evidence gathered from data collected was then analysed to develop the report for presentation to the Council.

The review identified that Day Service provide vital support for those assessed as needing this care, as well as providing respite to carers.

The review also identified that the average number of people registered at day services has fallen significantly over the past 10 years. All day centres are underutilised and therefore not an efficient spend on the Council's pressured budget.

Combining two of our day centre services for a wider client group will enable a varied programme to be delivered for all service users; Basing the new combined services at Cwmni Dda and relocation to Cwrt Yr Orsaf will provide users with access to facilities and services that are not currently available in Trecynon and Tonyrefail day centres.

1.d) Please outline where delivery of this proposal is affected by legislation or other drivers such as code of practice.

In considering this proposal, the Council will need to meet its requirements under the Social Services and Wellbeing (Wales) Act 2014 and accompanying Part 4 code of practice.

1.e) Please outline who this proposal affects:

- Service users
- Employees
- Wider community

SECTION 2 – SCREENING TEST – IS A FULL EQUALITY IMPACT ASSESSMENT REQUIRED?

Screening is used to determine whether the initiative has positive, negative or neutral impacts upon protected groups. Where negative impacts are identified for protected groups then a full Equality Impact Assessment is required. Please provide as much detail as possible of how the proposal will impact on the following groups, this may not necessarily be negative, but may impact on a group with a particular characteristic in a specific way.

Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011 - All social care staff undertake Equality and Diversity training as part of the Social Care Wales Induction Framework.

The Public Sector Equality Duty requires the Council to have “due regard” to the need to eliminate unlawful discrimination, harassment and victimisation; advance equality of opportunity between different groups; and foster good relations between different groups. Please take an intersectional approach in recognising an individual may have more than one protected characteristic.

<u>Protected Characteristics</u>	Does the proposal have any positive, negative or neutral impacts	Provide detail of the impact	What evidence has been used to support this view?
Age (Specific age groups i.e. young people or older people)	<p>Negative (in respect of immediate residents through the potential of being relocated to another day centre)</p> <p>Positive – Future provision – state of the art facilities, better services/provision, more choice for older people, will effectively meet complexity of individual’s needs.</p>	<p>The proposal will impact on older people as the day centres provides a day service for older people, including several people who have dementia.</p> <p>Service users and their families during previous consultations have raised some concerns over the impact of moving to an alternative environment.</p> <p>Adult Social Care will need to take the individual health and wellbeing of each service user, as well as the needs of families and carers, into account as part of its arrangements for supporting service users to relocate, should the proposals be agreed by Cabinet.</p> <p>We will assist in ensuring that the risks which can be associated with a move are</p>	<p>We have successfully relocated service users from Bronllwyn day centre to other Council run day centres with no detrimental effect. We will draw on previous experience and utilise best practice to support this process.</p> <p>We will ensure all service users in day care services will have a personal support plan review to ensure we are providing the service needed, so that there are no negative impacts for this client group.</p> <p>55 service users will be affected by the proposal to amalgamate Trecynon and Cwmni Dda.</p>

<u>Protected Characteristics</u>	Does the proposal have any positive, negative or neutral impacts	Provide detail of the impact	What evidence has been used to support this view?
		<p>kept to a minimum. This is based on thorough assessments, including risk to health and wellbeing, and ensuring that all factors are fully considered in the process of identifying where a service user moves to and ensuring the move itself is properly handled.</p> <p>Follow best practice guidance.</p> <p>Involvement and engagement with service users, their families / carers.</p> <p>Development of transitional plans.</p> <p>Staff from current day centres will relocate with the service users to support a seamless transition and provide continuity of care.</p> <p>However, the proposed reconfiguration of day services will ensure, if agreed, that older people, including those with disabilities will have better quality care in a more appropriate environment that is more suited to their individual needs and</p>	<p>64 service users will be affected by the proposal to relocate Tonyrefail day centre to Cwrt Yr Orsaf, extra care facility, should the decision be agreed by cabinet a further EIA will be undertaken to reflect the decision.</p> <p>Our service records indicate that a proportion of service users have some significant age-related needs. – Age profile of residents is 50 -99 years of age</p> <p>Previous consultations</p> <p>New models of day services have been developed over recent years in the county borough and they have delivered positive outcomes for older people, including those with dementia and their carers and families, (an Outreach</p>

<u>Protected Characteristics</u>	Does the proposal have any positive, negative or neutral impacts	Provide detail of the impact	What evidence has been used to support this view?
		<p>wishes; thereby improving the lives of adults that utilise day care service.</p> <p><u>Council's Day Services Staff:</u></p> <p>Age and gender demographics of staff as follows:</p> <p>Total – 38 staff</p> <p>Male: 5 staff = 13%</p> <p>Female: 33 = 87%</p> <p>Age range of staff:</p> <p>16 – 25: 4 (10%)</p> <p>26 – 35: 1 (3%)</p> <p>36 – 45: 3 (8%)</p> <p>46 – 55: 13 (34%)</p> <p>56 – 65: 17 (45%)</p> <p>The age profile of staff ranges from 21 to 63.</p> <p>45% of staff are over 56 years of age.</p>	<p>support day service has been developed).</p> <p>Day centre service users are regularly assessed so that changing needs can be identified - Social Workers would be involved in any change of service required.</p> <p>Provision of day services is aimed at enabling vulnerable people to maintain their independence and provides respite for families and carers and helps to sustain family networks.</p> <p>Investment and modernisation will support changes in the demographics of the elderly population and will meet the needs of both frail and more active older people and provide a day service provision that meets the aspirations of the</p>

<u>Protected Characteristics</u>	Does the proposal have any positive, negative or neutral impacts	Provide detail of the impact	What evidence has been used to support this view?
		<p>To mitigate any changes to the operation of day services at Trecynon and Tonyrefail may impact on staff directly employed within the day centres. Should any proposals be developed, that would impact upon staff, consultation and engagement with staff and the recognised Trade Unions would be undertaken in line with the Council's well-established policies relating to the management of change.</p>	<p>current elderly community and of future generations.</p> <p>38 staff will be potentially affected by the proposal.</p> <p>Staffing profile from ITrent</p> <p>All staff affected by the proposal will be supported via the Management of Change protocol.</p>
<p>Disability (people with visible and non-visible disabilities or lo-term health conditions)</p>	<p>Immediate Negative – as above</p> <p>Future Positive – as above</p>	<p>The frail nature of some of the service users and the fact that a number also have dementia means that in terms of disability, the proposals could result in a negative impact for people affected who might be deemed to be disabled as well as elderly.</p> <p>Dementia can impact upon on a persons' capacity to make an informed decision, and those who lack capacity to make this decision would need to be supported by relatives, people with power of attorney</p>	<p>Previous consultations.</p> <p>An <u>Easy Read</u>, accessible format of the information booklet and questionnaire was created and supplied during the meetings. This will enable individuals' to fully engage in the process.</p> <p>Full assessments will be completed, and relatives / advocates will be consulted to</p>

<u>Protected Characteristics</u>	Does the proposal have any positive, negative or neutral impacts	Provide detail of the impact	What evidence has been used to support this view?
		<p>or independent advocates where required/appropriate in accordance with mental capacity law.</p> <p>A number of service users require support with their mobility and/or have sensory impairments.</p> <p>Adult Social Care will need to take the individual health and wellbeing of each resident, as well as the needs of families and carers, into account as part of its arrangements for supporting individuals 'to relocate, should the proposals be agreed by Cabinet.</p> <p>We will assist in ensuring that the risks which can be associated with a move are kept to a minimum. This is based on thorough assessments, including risk to health and wellbeing, and ensuring that all factors are fully considered in the process and ensuring the move itself is properly handled.</p> <p>However, proceeding with the proposal would have a positive impact on existing</p>	<p>ensure location and facilities of their choice fully meets the service users' needs.</p>

<u>Protected Characteristics</u>	Does the proposal have any positive, negative or neutral impacts	Provide detail of the impact	What evidence has been used to support this view?
		and future day service individuals, as the proposal indicates that existing and future service users will have increased opportunities of socialisation, horticultural activities, and enhanced use of outdoor space.	
Gender Reassignment (anybody who's gender identity or gender expression is different to the sex they were assigned at birth including non-binary identities)	Immediate Neutral Future - Positive	It is considered that the proposal will have no direct impact on people who share this characteristic.	There is no evidence to suggest that the proposal will have an impact on people that share this characteristic.
Marriage / Civil Partnership (people who are married or in a civil partnership)	Neutral	It is considered that the proposal will have no direct impact on people who share this characteristic.	There is no evidence to suggest that the proposal will have an impact on people that share this characteristic.
Pregnancy and Maternity (women who are pregnant/on maternity leave)	Neutral	It is considered that the proposal will have no direct impact on people who share this characteristic.	There is no evidence to suggest that the proposal will have an impact on people that share this characteristic.
Race (ethnic and racial groups i.e. minority ethnic groups, Gypsy, Roma and Travellers)	Future – positive	It is considered that the proposal will have no direct impact on people who share this characteristic.	The service employs staff from ethnic minority groups and will continue to support employment and admissions

<u>Protected Characteristics</u>	Does the proposal have any positive, negative or neutral impacts	Provide detail of the impact	What evidence has been used to support this view?
			for individuals that share this characteristic.
Religion or Belief (people with different religions and philosophical beliefs including people with no beliefs)	Neutral	It is considered that the proposal will have no direct impact on people who share this characteristic.	<p>There is no evidence to suggest that the proposal will have an impact on people that share this characteristic.</p> <p>Services will be able to cater for specific dietary requirements including those required for religious observations.</p>
Sex (women and men, girls and boys)	Negative – staffing perspective. Workforce is predominately female.	It is considered that the proposal will have no direct impact on people who share this characteristic.	<p>Women are more prominent within care sector workforce.</p> <p>Female service users are more significant than men.</p>
Sexual Orientation (bisexual, gay, lesbian, straight)	Future - Positive	<p>It is considered that the proposal will have no direct impact on people who share this characteristic.</p> <p>Should officers be made aware of any potential impacts related to this protected characteristic, this EIA will be updated accordingly.</p>	There will be a requirement on all services to demonstrate robust policy and training arrangements for Equality and Diversity to support inclusive practice.

<u>Protected Characteristics</u>	Does the proposal have any positive, negative or neutral impacts	Provide detail of the impact	What evidence has been used to support this view?
<p>Armed Forces Community (anyone who is serving, has served, family members and the bereaved)</p>	<p>Negative</p> <p>Future – positive</p>	<p>Veterans could be indirectly impacted through the proposed changes to day services.</p> <p>Evidence suggests that veterans in RCT are older and likely to have disabilities or long-term health or mobility conditions. There may therefore be veterans that use day services.</p>	<ul style="list-style-type: none"> • 3.2% of people in RCT have previously served in the UK regular armed forces • 0.7% of people in RCT have previously served in the UK reserve armed forces • 0.2% of people in RCT have previously served in both regular and reserve UK armed forces <p>(Census 2021, Population Maps)</p> <p>Adult services will link in with the Regional Armed Forces Covenant Liaison Officer to assist with the identification of any veterans using our services to gain advice specifically for the communication and support to veterans</p> <p>Armed Forces Veterans are supported within our day service provision and the service will continue to support individuals that share this characteristic</p>

<u>Protected Characteristics</u>	Does the proposal have any positive, negative or neutral impacts	Provide detail of the impact	What evidence has been used to support this view?
<p>Carers (anyone of any age who provides unpaid care)</p>	<p>Neutral</p>	<p>The proposal would have a neutral impact on carers, as the Council is continuing to provide a day service provision with care to people with an assessed need. However, proposals may have an impact on carers in terms of ease of access to support their family members to a day centre.</p> <p>Transport links to any alternative day centre and the ability of carers to continue to transport them will be important in any planning process.</p> <p>Service users attended days will not change due to the proposal and those assessed as requiring/ receiving transport in line with their care and assessed need would continue as normal.</p>	<p>Previous consultations</p> <p>New models of day service provision with care developed over recent years in the county borough have delivered positive outcomes for older people, and their carers and families.</p> <p>There will be assessment of impact on carers during and following consultation stage.</p>

If the initial screening test has identified negative impacts, then a full equality impact assessment (section 4) **must** be undertaken. However, if after undertaking the above screening test you determine a full equality impact assessment is not relevant, please provide an adequate explanation below:

Not applicable

Are you happy you have sufficient evidence to justify your decision?

Yes

No

Name: Jill Bow

Position: Head of Accommodation Services

Date: 22th October 2023

SECTION 3 – SOCIO-ECONOMIC DUTY (STRATEGIC DECISIONS ONLY)

The Socio-economic Duty gives us an opportunity to do things differently and put tackling inequality genuinely at the heart of key decision making. Socio-economic disadvantage means living on a low income compared to others in Wales, with little or no accumulated wealth, leading to greater material deprivation, restricting the ability to access basic goods and services.

Please consider these additional vulnerable groups and the impact your proposal may or may not have on them:

<ul style="list-style-type: none">• Single parents and vulnerable families• Pensioners• Looked after children.• Homeless people• Students• Single adult households	<ul style="list-style-type: none">• People living in the most deprived areas in Wales.• People with low literacy and numeracy• People who have experienced the asylum system.• People misusing substances.• People of all ages leaving a care setting• People involved in the criminal justice system
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All individuals are means tested prior to admission. Most of our current day centre service users care costs are funded via this method.

<u>Socio-economic disadvantage</u>	Does the proposal have any positive, negative or neutral impacts	Provide detail of the impact	What evidence has been used to support this view?
<p>Low Income/Income Poverty <i>(cannot afford to maintain regular payments such as bills, food, clothing, transport etc.)</i></p>	Neutral	<p>It is not envisaged that there would be any financially adverse impact on affected residents as a result of any decision(s) made in respect of the proposals.</p> <p>Transport links to any alternative day centre and the ability (including cost implications) of family and friends to continue to family member will be important in any planning process.</p>	<p>All current service users' will have been financially assessed to determine any contribution required.</p> <p>There will be assessment of impact during and following consultation stage.</p>
<p>Low and / or No Wealth <i>(enough money to meet basic living costs and pay bills but have no savings to deal with any unexpected spends and no provisions for the future)</i></p>	Neutral	<p>It is not envisaged that there would be any financially adverse impact on affected service users as a result of any decision(s) made in respect of the proposals.</p> <p>Transport links to any alternative day centre and the ability (including cost implications) of family and friends to continue to transport them will be important in any planning process.</p>	<p>All current service users will have been financially assessed to determine any contribution required.</p> <p>There will be assessment of impact during and following consultation stage.</p>
<p>Material Deprivation <i>(unable to access basic goods and services i.e. financial products like life insurance, repair/replace broken electrical goods, warm home, hobbies etc.)</i></p>	Neutral	<p>It is not envisaged that there would be any financially adverse impact on affected residents as a result of any decision(s) made in respect of the proposals.</p>	<p>All current service users will have been financially assessed to determine any contribution required.</p>

<u>Socio-economic disadvantage</u>	Does the proposal have any positive, negative or neutral impacts	Provide detail of the impact	What evidence has been used to support this view?
			There will be assessment of impact during and following consultation stage.
<u>Area Deprivation</u> (where you live (rural areas), where you work (accessibility of public transport))	Negative	<p>It is not envisaged that there would be any financially adverse impact on affected residents as a result of any decision(s) made in respect of the proposals.</p> <p>Transport links to any alternative day centre and the ability (including cost implications) of family and friends to continue to transport their family member will be important in any planning process.</p> <p>There will be implication for some employee's who may not be able to continue walking to work. The new geographical location may benefit other employees who live nearer the new centre.</p> <p>Accessibility to public transport will be much improved for some staff as the new centre is in a town centre location with a bus & train station.</p>	<p>All current service users will have been financially assessed to determine any contribution required in line with fairer charging protocol.</p> <p>There will be assessment of impact during and following consultation stage.</p>

<u>Socio-economic disadvantage</u>	Does the proposal have any positive, negative or neutral impacts	Provide detail of the impact	What evidence has been used to support this view?
Socio-economic background <i>(social class i.e. parents education, employment and income)</i>	Neutral	It is not envisaged that there would be any financially adverse impact on affected residents as a result of any decision(s) made in respect of the proposals.	All current service users will have been financially assessed to determine any contribution required. There will be assessment of impact during and following consultation stage.
Socio-economic disadvantage <i>(What cumulative impact will the proposal have on people or groups because of their protected characteristic(s) or vulnerability or because they are already disadvantaged)</i>	Neutral	It is not envisaged that there would be any financially adverse impact on affected service users as a result of any decision(s) made in respect of the proposals. Transport links to any alternative day centre and the ability (including cost implications) of family and friends to continue to transport their family member will be important in any planning process. There may be a negative impact on some individuals as their journey time to day centre will increase. If transport is provided by family, this will have a negative impact in terms of journey times and increased fuel costs.	All current service users will have been financially assessed to determine any contribution required. There will be assessment of impact during and following consultation stage.

<u>Socio-economic disadvantage</u>	Does the proposal have any positive, negative or neutral impacts	Provide detail of the impact	What evidence has been used to support this view?
		However, there is some individuals who will benefit from reduced journey times.	

SECTION 4 – FULL EQUALITY IMPACT ASSESSMENT

You should use the information gathered at the screening stage to assist you in identifying possible negative/adverse impacts and clearly identify which groups are affected.

- 4.a) In terms of disproportionate/negative/adverse impacts that the proposal may have on a protected group, outline the steps that will be taken to reduce or mitigate the impact for each group identified.

An action plan to reduce/mitigate these impacts will be collated during and following the consultation process. Proposed mitigation, subject to public consultation, if agreed by Cabinet, includes:

- The welfare of service users would be the primary consideration in the event of any service change agreed by Cabinet. It would be approached in a planned and carefully managed way, in line with best practice guidance. This would include the involvement of residents, families, friends, advocates, and staff from the day centre services.
- Adult Social Care has experience of achieving this with previous day centre closure. It is acknowledged that there are risks with moving any person, including planned moves. Adult Social Care has a lot of experience of moving people to alternative services in line with their assessed needs as it is part of core business, for example, as care needs change,
- Where a resident could not make an informed choice or has no family, an independent advocate would be made available with decisions required in selecting and moving to a suitable alternative day service provision.

- 4.b) If ways of reducing the impact have been identified but are not possible, please explain why they are not possible.

Any changes to the operation of day services may impact on staff directly employed within the day centres. Should any proposals be developed, that would impact upon staff, consultation and engagement with staff and the recognised Trade Unions would be undertaken in line with the Council's well-established policies relating to the management of change.

- 4.c) Give sufficient detail of data or research that has led to your reasoning, in particular, the sources used for establishing the demographics of service users/staff.

The outcome of previous consultations and Cabinet reports, together with supporting information from local adult social care records and analysis of previous and current service provision have informed the proposals. Along with National policy and national and local strategy developments.

- 4.d) Give details of how you engaged with service users/staff on the proposals and the steps taken to avoid any disproportionate impact on a protected group. Explain how you have used feedback to influence your decision.

To be actioned following Cabinet's approval to consult on the service proposals.

- 4.e) Are you satisfied that the engagement process complies with the requirements of the Statutory Equality and Socio-economic Duties?

Yes

No

SECTION 5 – MONITORING, EVALUATING AND REVIEWING

- 5a) Please outline below how the implementation of the proposal will be monitored:

Following the consultation, the impact assessment will be updated, and Cabinet will receive a further report on the outcome of the consultation.

Implementation of a robust transition plan.

Service satisfaction will be monitored through the quality assurance framework and regular review of service users and staff.

EIAs to be continually updated in line with decision making and further consultation.

Individual service users will receive individual reviews which will support additional monitoring about the Day Care Provision amalgamation / relocation of services has taken place.

The service area will continue to work with all service users to monitor the continuity of day care provided.

5b) When is the evaluation of the proposal due to be reviewed?

To be determined following Cabinet's final decision.

5c) Who is responsible for the monitoring and review of the proposal?

Director of Adult Services.

5d) How will the results of the monitoring be used to develop future proposals?

To be determined following Cabinet's final decision.

SECTION 6 – REVIEW

For all policy proposals, whether it is a Significant Key Decision or not, you are required to forward this assessment to Diversity and Inclusion team – equality@rctcbc.gov.uk and the Consultation and Engagement team – consultation@rctcbc.gov.uk in the first instance for some initial guidance and feedback.

As part of the Welsh Language, Equalities and Socio Economic Duty Impact Assessment Process all proposals that fall within the definition of Significant Key Decision should present at the Officer Review Panel. This panel is made up of officers from across Council Services and acts as a critical friend before your report is finalised and published for SLT/Cabinet approval.

If this proposal is a Key Strategic Decision please forward your completed impact assessment, policy proposal/report and consultation report to CouncilBusiness@rctcbc.gov.uk for an Officer Review Panel to be organised to discuss your proposal. See our guidance document for more information on what a Significant Key Decision is.

It is important to keep a record of this process so that we can demonstrate how we have considered and built in equality/Socio economic considerations wherever possible. Please ensure you update the relevant sections below in collaboration with the relevant departments.

Diversity and Inclusion team Comments	Date Considered	Brief description of any amendments made following Officer Review Panel considerations
	November 2022	The comments of the Diversity and Inclusion team have been incorporated into the EIA.
Consultation Comments	Date Considered	Brief description of any amendments made following consultation
N/A		
Officer Review Panel Comments	Date Considered	Brief description of any amendments made following Officer Review Panel considerations
		An officer Review Panel will take place during the week commencing 13th November 2023 and the feedback will be presented to Cabinet prior to its meeting

SECTION 7 – SUMMARY OF IMPACTS FOR THE PROPOSAL

Provide below a summary of the impact assessment. This summary should be included in the equality and socio-economic impact section of the Cabinet report template. The impact assessment should be published alongside the report.

Proceeding with the proposals would have an impact on existing and future Care Home residents. There would be a disproportionate impact on older people and people with a range of disabilities.

The Council will take account of the challenges which the people affected by the proposals in this report face, both in terms of participation in the consultation and in ensuring that the impact of any changes is mitigated as detailed in the impact assessment, if they are to be implemented.

Subject to Cabinet agreeing to initiate a consultation on the proposed preferred options, the impact assessment will be reviewed and updated to include any further mitigated risks following the consultation process.

SECTION 8 – AUTHORISATIONS

Lead Officer:

Name: Jill Bow

Position: Head of Accommodation Services

Date: 13th November 2023

I recommend that the proposal:

- Is implemented with no amendments
- Is implemented taking into account the mitigating actions outlined
- Is rejected due to disproportionate negative impacts on protected groups or socio-economic disadvantage

Head of Service/Director Approval:

Name: **Neil Elliott**

Position: **Director of Social Services**

Date: **14th November 2023**

Please submit this impact assessment with any SLT/Cabinet Reports.