

Equality Impact Assessment / Equality Analysis

(Version 4)

Item name	Details
Title of service or policy	Independent Reviewing Service
Name of directorate and service	Children's Services and Education, Children's Quality Assurance and Safeguarding
Name and role of officers completing the EqIA	Sarah Hogan, Head of Service, Children's Quality Assurance and Safeguarding
Date of assessment	November 2025

Equality Impact Assessment (or ‘Equality Analysis’) is a process of systematically analysing a new or existing policy or service to identify what impact or likely impact it will have on people and different groups within our community. The main aim is to identify any adverse impacts (i.e. discriminatory or negative consequences for a particular group or sector of the community, and to identify areas where equality can be better promoted). Equality impact Assessments (EqIAs) can be carried out in relation to services provided to customers and residents as well as employment policies/strategies that relate to staffing matters.

This toolkit has been developed to use as a framework when carrying out an Equality Impact Assessment (EqIA) or Equality Analysis. **Not all sections will be relevant – so mark N/A any that are not applicable.** It is intended that this is used as a working document throughout the process, and a final version will be published on the Council’s website following relevant service lead approval.

1.1 Identify the aims of the policy or service and how it is implemented

Key questions	Answers / notes
<p>1.1 Briefly describe purpose of the service/policy e.g.</p> <ul style="list-style-type: none"> ● How the service/policy is delivered and by whom ● If responsibility for its implementation is shared with other departments or organisations ● Intended outcomes 	<p>The Independent Reviewing Service works directly with children placed in the care of the Local Authority and is a statutory requirement as set out in the Adoption and Children Act 2002. Since 2004 all Local Authorities have been required to appoint an Independent Reviewing Officer (IRO) to look after children. In 2010 the IRO handbook was introduced which provides statutory guidance for IRO’s.</p> <p>The IRO Service sits under the Director for Children’s Services and Education, the functions of the Service are to ensure the care planning for children placed in the care of the Local Authority are sufficiently meeting the child’s needs.</p>
<p>1.2 Provide brief details of the scope of the policy or service being reviewed, for example:</p> <ul style="list-style-type: none"> ● Is it a new service/policy or review of an existing one? 	<p>The Manager of the IRO Service has responsibility for completing an annual report for the Director of Children’s Services, the Lead Member for Children and the Corporate Parenting Group, providing information about the children and young people placed in the care of the Local</p>

<ul style="list-style-type: none"> • Is it a national requirement?). • How much room for review is there? 	Authority. This report is a statutory requirement as set out in the IRO handbook.
1.3 Do the aims of this policy link to or conflict with any other policies of the Council?	The IRO Service reviews and monitors the care planning for children in care and the quality of social work practice within children's social care.

2. Consideration of available data, research and information

Key questions	Data, research and information that you can refer to
2.1 What equality focussed training have staff received to enable them to understand the needs of our diverse community?	All IRO's hold a Social Work Qualification where issues of equality, discrimination and oppression are a significant focus. Social Workers participate in continued professional development as a requirement of their registration with Social Work England. IRO's access equalities and diversity training as offered by the council and share their learning and knowledge with colleagues. Issues of diversity and equality feature within supervision and team meetings, IRO's work with children who have experienced a great deal of adversity within their childhood and must be sensitive to and consider in their work the effect this has on children now and as they grow and develop.
2.2 What is the equality profile of service users?	The IRO Service works with children from birth to 17 years old who cannot remain living with their family. These children will have been exposed to varying degrees of neglect or abuse. Two thirds of the children placed in the care of the Local Authority are White British, there is an over representation of children and young people who are from a Black, Asian Ethnic Minority Group, this is not unique to Bath and North East Somerset.
2.3 Are there any recent customer satisfaction surveys to refer to? What were the results? Are there	The service has received some feedback from parents, carers and professionals about the service provided by IRO's in this reporting period, this has all been positive. Two formal complaints were made which highlighted the importance of communication with parents and

any gaps? Or differences in experience/outcomes?	children in care. The service is seeking to introduce QR codes on all correspondence to provide opportunity for anyone coming into contact with the service to provide feedback.
2.4 What engagement or consultation has been undertaken as part of this EIA and with whom? What were the results?	This EQIA has been completed by the manager of the IRO service, who is relying upon their knowledge, expertise and oversight of the service. The manager supervises all IRO's within Bath and North East Somerset and as Head of Service for Children's Quality Assurance and Safeguarding has good grasp of the presenting issues for children in care.
2.5 If you are planning to undertake any consultation in the future regarding this service or policy, how will you include equality considerations within this?	It is intended that feedback will inform service delivery, how feedback is sought will take into consideration the diverse needs of the service users of the IRO service.

3. Assessment of impact: 'Equality analysis'

Based upon any data you have considered, or the results of consultation or research, use the spaces below to demonstrate you have analysed how the service or policy:

- Meets any particular needs of equalities groups or could help promote equality in some way.
- Could have a negative or adverse impact for any of the equality groups

Key questions	Examples of what the service has done to promote equality	Examples of actual or potential negative or adverse impact and what steps have been or could be taken to address this
3.1 Issues relating to all groups and protected characteristics	A child who is placed in the care of the Local Authority is required to be allocated an IRO within five working days of their entry into care. The role of the IRO is set out within statutory guidance and	There is no scope for a care experienced young person to have input from an IRO as the IRO's duties end once a child turns 18. IRO's however consider all plans for children approaching adulthood

	<p>underpinned by legislation. Any child in the care of the Local Authority will be allocated an IRO irrespective of their age, disability, gender, religion or belief, sex and sexual orientation</p> <p>It is imperative that children form a positive relationship with their IRO, where there are identified difficulties in this relationship which cannot be resolved, the manager of the IRO service will look to reallocate and consider what the child may want from their IRO to support appropriate matching.</p> <p>Children over the age of 7 can have an advocate to support them in understanding the decisions being made about them and to capture their wishes and feelings. Advocates are available to all children in care seven years and over, for children with a disability advocates are experienced in finding ways to best communicate with them and on their behalf.</p>	<p>and will escalate any concerns relating to plans for a child post 18 with children's social care colleagues and where relevant adult social care.</p>
<p>3.2 Sex – identify the impact/potential impact of the policy on women and men.</p>	<p>The IRO report considers the breakdown of males and females in care of the Local Authority. Across England, as of 31st March 2025, 56% of children in care were male and 44% female. In Bath and North East Somerset the gender breakdown is</p>	

	<p>relatively aligned with 54% of children in care being male and 46% female.</p> <p>Children coming into the care of the Local Authority is a result of assessments and decisions made by children's social care colleagues, there is no greater chance of coming into care whether you are male or female, it is based on whether the child is deemed to be safe.</p>	
3.3 Pregnancy and maternity	<p>Given the remit of the IRO service, there would be no Unborn Baby's allocated to an IRO. If a child in care were to become pregnant then IRO's would ensure that appropriate support and planning was in place for mother, father and baby, this would include plans for baby once born.</p> <p>A child in care would be supported to parent their baby, remaining in their foster placement or moving to a more specialist provision where there are levels of support, advice and guidance that meet the needs of mother and / or father and baby.</p>	<p>The service provided to a pregnant child in care would not differ to any other child in care.</p> <p>Should a baby be placed in care and not alongside their parent, the IRO would ensure the parent was actively involved in any meetings the IRO led and had the opportunity to contribute to care planning.</p>
3.4 Gender reassignment – identify the impact/potential impact of the policy on transgender people	<p>The IRO service and statutory guidance that underpins the work of the IRO does not differentiate based on gender identity. IRO's are very alert to issues of gender and the confusion some children have</p>	

	<p>with their identity. The IRO service will seek to ensure care planning considers a child's identity and support they may require. Specialist support will form part of the recommendations from a child in care review where areas of need for a child require additional input from those with the relevant expertise.</p>	
<p>3.5 Disability – identify the impact/potential impact of the policy on disabled people (ensure consideration of physical, sensory and mental health needs/differences)</p>	<p>Children in the care of the Local Authority that have a disability have often entered care with their parents' consent. Children with disabilities have the same level of contact with their IRO as other children who don't have a disability. IRO's are sensitive to the vulnerabilities of children in care who have a disability. remaining alert to their care experiences, being curious about their experiences and being creative in how they obtain the wishes and feelings of this cohort.</p> <p>IRO's are expected to continually develop their knowledge and skills and review national and local learning reviews that highlight how best to work with children who are deemed to have a disability.</p> <p>The annual report includes data around the number of children in care that have a diagnosed disability and the legal status that underpins their placement in care.</p>	<p>The views, wishes and feelings of Children with a disability is an area of challenge, IRO's are reliant upon those familiar to the child to convey their wishes and feelings, which the IRO will take into consideration when reviewing aspects of care planning.</p>

<p>3.6 Age – identify the impact/potential impact of the policy on different age groups</p>	<p>The IRO service works with children from birth until 17 years old, with IRO's having oversight of the care plans being devised for these children. IRO's must provide a view on the final care plan devised for a child; in doing so they will consider the child's age, level of needs and issues related to identity and culture.</p> <p>IRO's will challenge a care plan that does not provide the child with age appropriate permanence, such as a care plan for a child under two years old being foster care as opposed to adoption or family placement.</p> <p>The age in which a child comes into care does not determine the level of contact or input the child receives from an IRO. The IRO however will need to consider different aspects of care planning, a young baby will have very different needs to an adolescent.</p>	
<p>3.7 Race – identify the impact/potential impact on across different ethnic groups</p>	<p>IRO's consider a child's race and culture when reviewing and monitoring the care plan. IRO's will ensure that children have care arrangements where their ethnicity and race are promoted and considered, ensuring children are placed in areas that they feel connected to and where they feel they are represented.</p> <p>IRO's ensure the use of translators and that documents for children and their parents are</p>	<p>Placement sufficiency can create challenges in matching children to carers where there is a community in which the child can feel connected to. Although in this reporting period, the Local Authority has managed to place a higher percentage of unaccompanied young people in the local area or neighbouring authorities.</p>

	<p>translated. IRO's will make recommendations at a child's review that promote the child's ethnicity, race and culture.</p> <p>Unaccompanied Asylum Seeking Children's journey to the UK will have been traumatic and often these children have lost parents, siblings and family members and face an uncertain future when arriving in the UK. IRO's expect work with these children to focus on their experiences at home, reflecting on their journey to the UK and will want to see that action is being taken by the Local Authority to secure the child's future stay in the UK.</p>	<p>IRO's always seek to ascertain the views, wishes and feelings of children in care and consider this when reviewing the plans in place for them. Where IRO's identified concerns about placement matching, they would explore this further with the social worker, if concerns were to such a level the IRO felt immediate action was necessary, they would raise directly with the social worker and their manager. IRO's would utilise the dispute resolution protocol if concerns remained about care planning.</p>
<p>3.8 Sexual orientation – identify the impact/potential impact of the policy on lesbian, gay, bisexual, heterosexual, questioning people</p>	<p>The statutory nature of the IRO service means that the service provision to a child in care should not alter based on any issues of equality. IRO's in working with children in care will be alert to presenting areas of need and ensure these are considered within a child's care plan.</p> <p>IRO's receive monthly supervision, any challenges they face or have identified in their work with children in care will be reflected upon and plans agreed to promote any issues of equality.</p>	
<p>3.9 Marriage and civil partnership – does the policy/strategy treat married and civil partnered people equally?</p>	<p>N/A given age of service users.</p>	

<p>3.10 Religion/belief – identify the impact/potential impact of the policy on people of different religious/faith groups and also upon those with no religion.</p>	<p>IRO's are accountable in ensuring all aspects of a child's needs are being met.</p>	<p>The IRO report does not specify matters related to religion or belief; however this is an area that IRO's in their work with children focus on and review. IRO's would expect to see reference to how a child's religion, beliefs and culture were going to be met and promoted whilst in care.</p>
<p>3.11 Socio-economically disadvantaged* – identify the impact on people who are disadvantaged due to factors like family background, educational attainment, neighbourhood, employment status can influence life chances (this is not a legal requirement, but is a local priority).</p>	<p>IRO's become appointed to children and young people at the point in which they become looked after by the Local Authority.</p> <p>A child coming into care will be expected to have a final care plan devised by their second child in care review, when they have been in care for approximately four months.</p> <p>IRO's will review and monitor the care plans being devised and will expect to see that all family members have been explored as a long term care option before Local Authority care or Adoption. IRO's will highlight any gaps in service provision or assessment.</p> <p>As part of their responsibilities, IRO's are expected to consider the child's needs in respect of physical health, education, mental health, relationships, care arrangement, connections within their local community, relationship with their social worker, permanency planning.</p> <p>IRO's will want assurances that intervention has been provided to the child's parents in order to address any safeguarding concerns or gaps in knowledge, IRO's would utilise the</p>	

	dispute resolution protocol if they had concerns that a child and/or their family were not receiving services that could improve the family dynamics and parenting capacity.	
3.12 Rural communities* identify the impact / potential impact on people living in rural communities	Carers are expected to support children and promote their needs and independence, taking into consideration how a child may experience living in a rural area and what they may need to navigate this in an age appropriate way.	
3.13 Armed Forces Community ** serving members; reservists; veterans and their families, including the bereaved. Public services are required by law to pay due regard to the Armed Forces Community when developing policy, procedures and making decisions, particularly in the areas of public housing, education and healthcare (to remove disadvantage and consider special provision).	There should be no differential treatment for a child who has links to Armed Forces. Good social work practice and care planning would see full exploration of a child's family and networks, with any support and intervention identified being assessed as necessary for the family and delivered in a way families can freely access.	
3.14 Care Experienced *** This working definition is currently under review and therefore subject to change: In B&NES, you are 'care-experienced' if you spent any time in your childhood in	The IRO service works with children until they leave care, the IRO role ends when a child leaves care. When children leave care in a planned way, the IRO will have overseen the	

<p>Local Authority care, living away from your parent(s) for example, you were adopted, lived in residential, foster care, kinship care, or a special guardianship arrangement.</p>	<p>progress of the plans for this and will seek to ensure the child's wishes and feelings and those of their family are central to the plans developed for a child leaving care. IRO's will hold a final child in care review ahead of a child leaving care, ensuring the assessment of needs informing the child's plan to leave inform the plans for the child once no longer a child in care.</p> <p>The IRO's role for a child leaving care in an unplanned way ends immediately upon the child leaving care, however IRO's will seek to gain assurance as to the support available upon leaving care. IRO's offer a post care review where this is felt necessary or wanted by the child and their family, this cannot be enforced given the statutory role of an IRO ends when the child leaves care.</p>	
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*There is no requirement within the public sector duty of the Equality Act to consider groups who may be disadvantaged due to socio economic status, or because of living in a rural area. However, these are significant issues within B&NES and have therefore been included here.

** The Equality Act does not cover armed forces community. However, the Armed Forces Bill (which came in on 22 Nov 2022) introduces a requirement to pay 'due regard' to make sure the Armed Forces Community are not disadvantaged when accessing public services.

***The Equality Act does not cover care experienced people. B&NES adopted this group as a protected characteristic in March 2024 alongside over 80 other Local Authorities. Although we have data for care leavers and children/young people who are currently in the care of B&NES we do not have wider data on disadvantage experienced through being in care.

4. Bath and North East Somerset Council Equality Impact Assessment Improvement Plan

Please list actions that you plan to take as a result of this assessment/analysis. These actions should be based upon the analysis of data and engagement, any gaps in the data you have identified, and any steps you will be taking to address any negative impacts or remove barriers. The actions need to be built into your service planning framework. Actions/targets should be measurable, achievable, realistic and time framed.

Issues identified	Actions required	Progress milestones	Officer responsible	By when
Feedback from children, their families, carers and professionals working with them has been an area that remains a challenge, the service does not have a designated resource to support the development and implementation of a feedback strategy. Some progress has been made in this reporting period and during 2025-2026 the service will introduce QR codes to allow anyone having an interface with the service to provide feedback.	Feedback mechanisms to be embedded within the service and included in all correspondence.		Sarah Hogan	2025-2026

5. Sign off and publishing

Once you have completed this form, it needs to be 'approved' by your Divisional Director or their nominated officer. Following this sign off, send a copy to the Equality Team (equality@bathnes.gov.uk), who will publish it on the Council's website. Keep a copy for your own records.

Signed off by:

(Divisional Director or nominated senior officer)

Date: