

**Equality Impact Assessment / Equality Analysis  
(Version 4)**

<b>Item name</b>	<b>Details</b>
<b>Title of service or policy</b>	Adult Social Care, Care Quality Commission Improvement Plan
<b>Name of directorate and service</b>	Adult Social Care (ASC)
<b>Name and role of officers completing the EqlA</b>	Suzanne Westhead, Director of Adult Social Services Nicola Pope, ASC Assurance Lead
<b>Date of assessment</b>	December 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 (EqlAs) 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"> <li>• How the service/policy is delivered and by whom</li> <li>• If responsibility for its implementation is shared with other departments or organisations</li> <li>• Intended outcomes</li> </ul>	<p>The Health and Care Act 2022 gave the Care Quality Commission (CQC) new powers to assess how Local Authorities meet their duties under Part 1 of the Care Act 2014.</p> <p>From April 2024 to September 2024 B&amp;NES ASC directorate underwent it’s CQC Local Authority Assessment under a 2 stage inspection approach, with the onsite element of the assessment process taking place from 10th September to 12th September 2024.</p> <p>The CQC published their report for B&amp;NES ASC on 30th January 2025, assigning a rating of Requires Improvement.</p> <p>Due to the Requires Improvement rating B&amp;NES ASC has been assigned a Care and Health Improvement Advisor (CHIA) from Partners in Care and Health (Southwest Region) who partner with the Local Government Association and Association of Directors of Adult Social Services. Partners in Care and Health are responsible for feeding back to the Department of Health and Social Care the progress Adult Social Care is making against the Improvement Plan and giving assurance.</p> <p>The ASC CQC Improvement Plan was developed January- March 2025. The Improvement Plan is broken down into the 4 Assessment Themes defined by CQC:</p> <ul style="list-style-type: none"> <li>• Theme 1: How the Local Authority Works with people</li> <li>• Theme 2: Providing Support</li> </ul>

	<ul style="list-style-type: none"> <li>• Theme 3: How the Local Authority ensures safety within the system</li> <li>• Theme 4: Leadership</li> </ul> <p>Each project has a senior responsible officer, and a lead- either a project manager or Head of Service, who is responsible for ensuring progress is made to deliver the Improvement Priorities. Each project collaborates with different teams across the council, as required, to ensure the project progresses and any barriers are overcome.</p> <p>This ASC Improvement Plan describes the steps we will take throughout 2025-2026 to further enhance our services. It reflects our own assessment of priority areas for improvement, alongside the key findings and areas for improvement against quality statement scores from the 2025 CQC Local Authority Assessment Report for B&amp;NES. ASC is driving forward a vision for a more responsive, effective, and sustainable Adult Social Care service.</p> <p>This EQIA is a working document and has been undertaken to provide assurance that projects delivering the Improvement Priorities have no adverse effects on individuals with protected characteristics.</p> <p>This EQIA demonstrates we are paying due regard to our Public Sector Equalities Duty as we progress work within the Improvement Plan. This EQIA is a working document, and we aim for this to be updated if there are any changes to the Improvement Priorities or projects delivering them. Should there be any changes made to these, we aim to consider whether there is likely to be any impact on individuals with protected characteristics.</p>
1.2 Provide brief details of the scope of the policy or service being reviewed, for example:	This is the first time ASC has been required to develop and implement Improvement Plan for 2025-26. This Improvement Plan is necessary to demonstrate to the Department of Health and Social Care (DHSC) that

<ul style="list-style-type: none"> <li>• Is it a new service/policy or review of an existing one?</li> <li>• Is it a national requirement?).</li> <li>• How much room for review is there?</li> </ul>	<p>progress is being made on the areas of Improvement identified before the CQC Inspection took place and incorporates feedback from the CQC Assessment Report.</p> <p>As per the Partner for Care and Health and DHSC guidelines, ASC currently provides quarterly progress updates to the DHSC. There have been four submissions to date: 13<sup>th</sup> February 2025, 30<sup>th</sup> April 2025, 30<sup>th</sup> July 2025 and 30<sup>th</sup> October 2025. The next submission is due in January 2026. The exact length of time that progress reports are required to be submitted to the DHSC is currently unknown. At the time of writing this EQIA, the future CQC Local Authority inspection framework is being reviewed. Local Authorities are awaiting further guidance on the CQC Assessment methodology for re inspection; this is expected in February 2026.</p> <p>The Improvement Plan applies to all adults aged 18 years and above who access commissioned care and support or a Direct Payment (DP), as well as some 17 years olds who are transitioning into Adult Social Care from Children's services.</p> <p>The Care Act 2014 legislates what services the Local Authority should provide as part of an individual's care package:  <a href="https://www.gov.uk/government/publications/care-act-statutory-guidance/care-and-support-statutory-guidance">https://www.gov.uk/government/publications/care-act-statutory-guidance/care-and-support-statutory-guidance</a></p>
<p>1.3 Do the aims of this policy link to or conflict with any other policies of the Council?</p>	<p>The overall aim for the ASC Improvement Plan is to improve outcomes for people who draw on care and support, and for all residents that may need to access ASC in the future, which is aligns with the Local Authorities' core purpose of 'Improving People's Lives'.</p> <p>There are no known conflicts with other council policies at this time.</p>

## 2. Consideration of available data, research and information

Key questions	Data, research and information that you can refer to
<p><b>2.1</b> What equality focussed training have staff received to enable them to understand the needs of our diverse community?</p>	<p>All B&amp;NES officers are required to undertake mandatory Equality, Diversity and Inclusion Training.</p> <p>The project leads, many of whom are registered Social Workers have much experience in working within the Equalities Act, promoting anti-discriminatory and anti-oppressive practice, as per the <u>Professional Standards</u> out by the British Association of Social Workers.</p>
<p><b>2.2</b> What is the equality profile of service users?</p>	<p>The B&amp;NES Council Strategic Evidence Base provides the equality profile for the B&amp;NES Population: <a href="https://www.bathnes.gov.uk/sites/default/files/SEB%20Population%20%26%20Demography%20Apr25.pdf">https://www.bathnes.gov.uk/sites/default/files/SEB%20Population%20%26%20Demography%20Apr25.pdf</a></p>
<p><b>2.3</b> Are there any recent customer satisfaction surveys to refer to? What were the results? Are there any gaps? Or differences in experience/outcomes?</p>	<p>To date, no customer satisfaction surveys have been conducted by ASC, specifically on the ASC Improvement Plan itself, however, some projects in place to deliver the Improvement Plan priorities have progressed and have developed surveys for residents. The surveys do not all relate to customer satisfaction, however they are all designed to get feedback and information about residents' thoughts and experiences. ASC, in collaboration with Healthwatch, launched a resident survey on Technology and Digital, in September 2025. The aim of this was to hear residents' ideas and views on digital and technology-enabled care (TEC) both to support staff giving care and to give residents more control over the care they receive. This survey has now closed, and the results are being analysed to inform the new Digital and Technology Strategy.</p> <p>Alongside this, the Audit Framework that was implemented in February 2025, continues to be adhered to. Each audit incorporates a follow-up telephone call to service users or their representatives in order to obtain feedback regarding their experiences with ASC. It should be noted that this activity operates in parallel with, rather than within, the ASC Improvement Plan, as part of our business-as-usual work. Thus far, 35 telephone calls have been completed, and of the individuals/ representatives who were able to rate their experience of their interaction with ASC (75%), 92.5% was positive and 7.5% was neutral.</p>

<p><b>2.4</b> What engagement or consultation has been undertaken as part of this EIA and with whom? What were the results?</p>	<p>The governance arrangements for the ASC Improvement Plan are designed to foster comprehensive engagement beyond the immediate ASC environment, thereby establishing a robust framework for oversight and constructive challenge.</p> <p>The ASC Improvement Board is chaired by the Executive Director for Operations. The Board convenes on a monthly basis to monitor progress against the improvement plan and is attended by representatives from various departments within the Local Authority, including the Equality, Diversity and Inclusion officer, finance, legal, communications and marketing, public health, and IT services. This broad participation helps share information on a wide scale, promotes sharing of different perspectives from across the system, and enables effective collaboration in addressing challenges, and assessing and mitigating risks. This approach ensures a holistic delivery of new initiatives, minimises the potential for implementation issues, and proactively reduces the likelihood of negative outcomes associated with the improvement plan.</p>
<p><b>2.5</b> If you are planning to undertake any consultation in the future regarding this service or policy, how will you include equality considerations within this?</p>	<p>Each individual project underpinning the delivery of the improvement priorities is supported by a dedicated project, work, or action plan. As work progresses to deliver each Improvement Priority, project/ work plans are updated and will specify appropriate or required consultation necessary for successful completion. Some of the actions needed to deliver the Improvement Priorities will necessitate internal engagement with council departments, while others will require engagement, feedback, and co-production with individuals who use services.</p> <p>As projects are progressing to deliver the Improvement Priorities, it is not yet clear which projects will need consultation on, because there is still necessary work to do before we get to that stage.</p> <p>This EQIA overarches the whole of the Improvement Plan. Each project that is contributing to the Improvement Plan, that delivers a change to the current operating procedures will be subject to its own Equalities Impact Assessment, which will be completed before the changes are implemented. Due consideration will be given to any perceived negative impacts that projects will have on residents and the necessary steps to prevent or minimise the impact will be taken.</p> <p>As part of the overall resourcing strategy for the Improvement Plan, in Improvement Priority 2.3 the creation of a 'Service User and Engagement Lead' position has been identified. The new Service User and Engagement Lead began in post in October 2025 and is responsible for ensuring robust and ongoing</p>

	community engagement with Adult Social Care, both as an integral element of the Improvement Plan and as part of ASC's continuous service development.
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### 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
<b>3.1 Issues relating to all groups</b> and protected characteristics	<p>The nine Improvement Priorities listed in the ASC Improvement Plan will improve outcomes for all the people who draw on care and support in B&amp;NES. Any changes to practice, policy or process will be carried out in line with the Care Act 2014 principles of:</p> <ul style="list-style-type: none"> <li>• empowerment</li> <li>• prevention</li> <li>• proportionality</li> <li>• protection</li> <li>• partnership</li> <li>• accountability</li> </ul> <p>Each project that delivers a change to the current operating procedures will be</p>	<p>Any changes made to the delivery of services, as a result of the Improvement Plan, will be made on the basis of individuals receiving a better experience of ASC and better outcomes for all individuals.</p> <p>Equality analysis will form an integral and ongoing part of the actions within the implementation Plan. Negative or adverse impacts will be considered and wherever possible mitigating action will be taken. Further to this, Improvement Priority 4.1 focusses on data analysis to help us understand more about our population and to inform our practice.</p>

	<p>subject to its own Equalities Impact Assessment.</p> <p>All services are offered based on the presenting needs of the individual and eligibility, regardless of if they have a protected characteristic. The new Practice Framework and Practice Standards, developed under Improvement Priority 1.3 lays out how ASC operational staff will conduct their day to day work, and what residents of B&amp;NES can expect during their interactions with ASC.</p> <p>The Improvement Plan incorporates innovative approaches to supporting individuals, encompassing the provision and accessibility of information, advice, and guidance, the development of a robust practice framework, and the empowerment of individuals by recognising and building upon their strengths, assets, and networks. Furthermore, the Plan emphasises the delivery of co-produced, person-centred care. These measures enhance our capacity not only to engage more effectively with groups that have previously experienced limited interaction, but also to positively influence their lives and improve the overall quality of available services.</p>	
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	There are robust governance arrangements in place to foster accountability across the service through our existing framework for assuring quality.	
<b>3.2 Sex</b> – identify the impact/potential impact of the policy on women and men.	The priorities of the improvement plan will consider how to develop and implement practice, policies or processes that create improved outcomes for men and women.	<p>Any assessment, support or services offered to men and women during the time the Improvement Plan is progressing, and following any changes to the delivery of services, will continue to be done in line with the Care Act 2014 eligibility criteria and existing Social Work and Occupational Therapy (OT) processes.</p> <p>The Improvement Plan is in place with an aim to reduce or eliminate adverse impacts for men and women.</p>
<b>3.3 Pregnancy and maternity</b>	The priorities of the improvement plan will consider how to develop and implement practice, policies or processes that create improved outcomes for individuals who are pregnant or on maternity leave.	<p>The ability to carry out caring responsibilities for a child is a statutory outcome which is assessed during assessments or reviews, and will be taken into consideration in determining whether the local authority provides care and support.</p> <p>Specific needs related to pregnancy and maternity will be considered throughout all actions of the projects delivering the Improvement Plan.</p>

		<p>The Improvement Plan is in place with an aim to reduce or eliminate adverse impacts for individuals who are pregnant or on maternity leave.</p>
<p><b>3.4 Gender reassignment</b> – identify the impact/potential impact of the policy on transgender people</p>	<p>The priorities of the improvement plan will consider how to develop and implement practice, policies or processes that create improved outcomes for individuals based on their gender identity.</p>	<p>Specific needs related to gender will be considered throughout all actions of the projects delivering the Improvement Plan.</p> <p>Actions within the improvement projects will be considerate of gender identity and this will be monitored.</p> <p>The Improvement Plan is in place with an aim to reduce or eliminate adverse impacts for individuals based on their gender identity.</p> <p>B&amp;NES council is awaiting the updated version of the Code of Practice before taking required legal action or advice based on the Supreme Court Ruling (April 2025). The Improvement Plan will reflect necessary actions.</p>
<p><b>3.5 Disability</b> – identify the impact/potential impact of the policy on disabled people (ensure consideration of physical, sensory and mental health needs/differences)</p>	<p>The priorities of the improvement plan will consider how to develop and implement practice, policies or processes that create improved outcomes for disabled people, including those supported by:</p> <ul style="list-style-type: none"> <li>• Older People's Services</li> <li>• Physical Disability and Sensory Services</li> <li>• Mental Health Services</li> <li>• Learning Disability Services</li> </ul>	<p>Specific needs related to an individual's disability will be considered throughout all actions of the projects delivering the Improvement Plan.</p> <p>The Improvement Plan is in place with an aim to reduce or eliminate adverse impacts for disabled people.</p>

	<ul style="list-style-type: none"> <li>Occupational Therapy Services</li> </ul>	
<b>3.6 Age</b> – identify the impact/potential impact of the policy on different age groups	<p>The priorities of the improvement plan will consider how to develop and implement practice, policies or processes that create improved outcomes for individuals aged 17 and above.</p>	<p>Specific needs related to an individual's age will be considered throughout all actions of the projects delivering the Improvement Plan.</p> <p>The Improvement Plan is in place with an aim to reduce or eliminate adverse impacts for individuals aged 17 and above.</p>
<b>3.7 Race</b> – identify the impact/potential impact on across different ethnic groups	<p>The priorities of the improvement plan will consider how to develop and implement practice, policies or processes that create improved outcomes for all ethnicities.</p> <p>Translation services will be used to meet individual requests or where a need is already known.</p>	<p>Specific needs related to an individual's race will be considered throughout all actions of the projects delivering the Improvement Plan.</p> <p>The Improvement Plan is in place with an aim to reduce or eliminate adverse impacts for individuals of all ethnicities.</p>
<b>3.8 Sexual orientation</b> – identify the impact/potential impact of the policy on lesbian, gay, bisexual, heterosexual, questioning people	<p>The priorities of the improvement plan will consider how to develop and implement practice, policies or processes that create improved outcomes for people of all sexual orientations.</p>	<p>Specific needs related to an individual's sexual orientation will be considered throughout all actions of the projects delivering the Improvement Plan.</p> <p>The Improvement Plan is in place with an aim to reduce or eliminate adverse impacts for individuals of all sexual orientations.</p>
<b>3.9 Marriage and civil partnership</b> – does the policy/strategy treat married and civil partnered people equally?	<p>The priorities of the improvement plan will consider how to develop and implement practice, policies or processes that create</p>	<p>Specific needs related to an individual's marital status will be considered</p>

	improved outcomes for married and civil partnered individuals.	<p>throughout all actions of the projects delivering the Improvement Plan.</p> <p>The Improvement Plan is in place with an aim to reduce or eliminate adverse impacts for married and civil partnered individuals.</p>
<b>3.10 Religion/belief</b> – identify the impact/potential impact of the policy on people of different religious/faith groups and also upon those with no religion.	The priorities of the improvement plan will consider how to develop and implement practice, policies or processes that create improved outcomes for individuals of all religions/ beliefs.	<p>Specific needs related to an individual's religion/belief will be considered throughout all actions of the projects delivering the Improvement Plan.</p> <p>The Improvement Plan is in place with an aim to reduce or eliminate adverse impacts for individuals of all religions/ beliefs.</p>
<b>3.11 Socio-economically disadvantaged*</b> – identify the impact on people who are disadvantaged due to factors like family background, educational attainment, neighbourhood, employment status can influence life chances <b>(this is not a legal requirement, but is a local priority).</b>	The priorities of the improvement plan will consider how to develop and implement practice, policies or processes that create improved outcomes for individuals who are socio-economically disadvantaged.	<p>Specific needs related to an individual's socio-economic status will be considered throughout all actions of the projects delivering the Improvement Plan.</p> <p>The Improvement Plan is in place with an aim to reduce or eliminate adverse impacts for individuals who are socio-economically disadvantaged.</p>
<b>3.12 Rural communities*</b> identify the impact / potential impact on people living in rural communities	The priorities of the improvement plan will consider how to develop and implement practice, policies or processes that create improved outcomes for individuals who live in rural communities.	Specific needs related to an individual who live in a rural community, will be considered throughout all actions of the projects delivering the Improvement Plan.

		<p>The Improvement Plan is in place with an aim to reduce or eliminate adverse impacts for individuals who live in rural communities.</p> <p>An integral component of the Improvement Plan is the systematic collection of feedback from individuals who access Adult Social Care for support. This appointment of the Service User Engagement Lead, places ASC in the strongest position to date to engage effectively with rural communities and seldom-heard groups who need to access ASC.</p>
<p><b>3.13 Armed Forces Community **</b> 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).</p>	<p>The priorities of the improvement plan will consider how to develop and implement practice, policies or processes that create improved outcomes for individuals who are from an armed forces community.</p>	<p>Specific needs related to an individual who is part of an Armed Forces Community, will be considered throughout all actions of the projects delivering the Improvement Plan.</p> <p>The Improvement Plan is in place with an aim to reduce or eliminate adverse impacts for individuals who are from an armed forces community.</p>
<p><b>3.14 Care Experienced ***</b> This working definition is currently under review and therefore subject to change:  In B&amp;NES, you are 'care-experienced' if you spent any time in your childhood in</p>	<p>The priorities of the improvement plan will consider how to develop and implement practice, policies or processes that create improved outcomes for individuals who are care experienced.</p>	<p>Specific needs related to an individual who is care experienced, will be considered throughout all actions of the projects delivering the Improvement Plan.</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.	The Practice Framework that will be launched in January 2026 describes how practitioners will work with people in a holistic and family approach to their work with individuals. The Practice Framework is subject to its own EQIA.	The Improvement Plan is in place with an aim to reduce or eliminate adverse impacts for individuals who are care experienced.
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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.

<b>Issues identified</b>	<b>Actions required</b>	<b>Progress milestones</b>	<b>Officer responsible</b>	<b>By when</b>
Each project that delivers a change to current practice or process will be required to	Project leads and senior responsible officers will give due consideration to whether	As projects progress to deliver the changes sought as part of the ASC Improvement Plan, the	Suzanne Westhead, Ann Smith,	Before changes are

complete an Equalities Impact Assessment	and Equalities Impact Assessment (EQIA) is required for the work they undertake as part of the Improvement Plan	project lead and senior responsible officer will update an EQIA where necessary. The equality analysis of the work will inform practice.	Natalia Lachkou, Claire Thorogood,	delivered into BAU
Equality Impact Assessments will be reviewed and updated.	Review and updated all published EQIAs on a regular basis or where there is a change to practice.	Evidence of updated EQIA.	All involved in the delivery of Improvement Plan	Ongoing.

## 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](mailto:equality@bathnes.gov.uk)), who will publish it on the Council's website. Keep a copy for your own records.

**Signed off by:**  
**Date:**

(Divisional Director or nominated senior officer)