

Equality Impact Assessment / Equality Analysis

(Version 4)

| Item name | Details |
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| Title of service or policy | Children's Social Care – Sufficiency Statement |
| Name of directorate and service | Children's Services |
| Name and role of officers completing the EqIA | Paula Sumner - Assistant Director- Children's Transformation |
| Date of assessment | 26 th February 2026 |

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 |
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| <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 Sufficiency Programme is designed to ensure that Bath & North East Somerset Council meets its statutory duty under Section 22G of the Children Act 1989 to secure, “so far as reasonably practicable,” sufficient accommodation for children in care within the local area.</p> <p>The programme comprises four workstreams—fostering, residential children’s homes, provision for disabled children (short breaks and direct payments), and 16+ accommodation/care leaver support—and seeks to:</p> <ul style="list-style-type: none"> ● Understand current and future placement needs across all cohorts of children in care. ● Improve the availability, quality, and stability of local placements. ● Strengthen recruitment and retention of foster carers and supported lodgings carers. |

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| | <ul style="list-style-type: none"> • <i>Enhance the accommodation and support offer for care-experienced young people.</i> • <i>Improve access to statutory short breaks and direct payments for disabled children and their families.</i> • <i>Reduce reliance on out-of-area and higher-cost placements.</i> <p><i>Delivery involves Children’s Services, the Sufficiency Board, commissioning, Housing, fostering services, and regional partners.</i></p> |
| <p><i>1.2 Provide brief details of the scope of the policy or service being reviewed, for example:</i></p> <ul style="list-style-type: none"> • <i>Is it a new service/policy or review of an existing one?</i> • <i>Is it a national requirement?).</i> • <i>How much room for review is there?</i> | <p>In scope:</p> <ul style="list-style-type: none"> • <i>Analysis of current placement use across fostering, residential and supported lodgings.</i> • <i>Development of business cases (housing adaptations for foster carers; Special Guardianship allowance alignment; in-house residential provision).</i> • <i>Review of current foster carer offer, including council tax reduction.</i> • <i>Strategic needs assessments across all four workstreams.</i> • <i>Reunification activity.</i> • <i>Partnership working with housing, regional fostering hubs, and providers.</i> <p>Out of scope:</p> <ul style="list-style-type: none"> • <i>National policy changes (e.g., Regional Care Cooperatives, fostering reform).</i> • <i>Adoption services (except where children are “placed with adopters”).</i> • <i>Universal services beyond Children’s Services.</i> |

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| <p>1.3 Do the aims of this policy link to or conflict with any other policies of the Council?</p> | <ul style="list-style-type: none"> • Corporate Parenting Strategy • Placement Sufficiency Duties (Children Act 1989) • SEND Strategy • Housing Strategy (relevant to care experienced young people) • Fostering Recruitment Strategy • Short Breaks Duty (Breaks for Carers of Disabled Children Regulations 2011) <p>No conflicts identified.</p> |
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2. Consideration of available data, research and information

| Key questions | Data, research and information that you can refer to |
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| <p>2.1 What equality focussed training have staff received to enable them to understand the needs of our diverse community?</p> | <p>Children's Services staff receive:</p> <ul style="list-style-type: none"> • Mandatory equality and diversity training • Trauma informed practice training • Cultural awareness training (including Unaccompanied Asylum Seeking Children specialisms) • Systemic practice training • Training and consultations with Stand Against Racism (SARI) • Research in Practice – Cultural Humility |

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| | <p><i>Additional training will be required for new models of support emerging through the programme.</i></p> |
| <p>2.2 <i>What is the equality profile of service users?</i></p> | <p><i>Based on the strategic needs assessment:</i></p> <ul style="list-style-type: none"> • 228 children in care, including: <ul style="list-style-type: none"> • 87 in foster care • 48 in kinship foster care • 49 in residential care • 28 in 16+ supported provision • 10% UASC (with indications of rising numbers among care leavers) • <i>Children with complex needs requiring specialist residential and fostering provision.</i> • <i>Disabled children eligible for short breaks and direct payments.</i> • <i>Care experienced young people aged 16–25 with varied accommodation and support needs.</i> |
| <p>2.3 <i>Are there any recent customer satisfaction surveys to refer to? What were the results? Are there any gaps? Or differences in experience/outcomes?</i></p> | <ul style="list-style-type: none"> • <i>Ofsted rated Children’s Services Good (2025), including placement quality and safety.</i> • <i>Feedback indicates strong relationships with foster carers and support teams.</i> • <i>A recent survey (Nov 2025 – Jan 2026) was sent to all in-house foster carers to gauge the interest and feasibility of housing alterations. These alterations would aim to optimise homes for fostering by increasing the number or size of bedrooms, therefore increasing the number of children that could be cared for. Insights include:</i> <ul style="list-style-type: none"> ○ <i>Many of the foster carers responding have been fostering for more than 2 years, which shows a level of commitment to both young people and to being an in-house foster carer.</i> |

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| | <ul style="list-style-type: none"> ○ <i>A significant majority (90%) of respondents indicated they would be interested in extending their homes to look after more children, or to learn more about it.</i> ○ <i>53% of respondents said they would commit to an extra 10 years of fostering, should B&NES fund an adaptation.</i> <ul style="list-style-type: none"> ● <i>Areas for improvement include:</i> <ul style="list-style-type: none"> ○ <i>Placement stability</i> ○ <i>Timeliness and quality of return-home (missing) interviews</i> ○ <i>Meeting needs of UASC (cultural match, integration support)</i> ○ <i>Access to specialist provision</i> ● <i>As part of the wider fostering project foster carers are being invited to speak to the project team to understand their experiences from initial contact through to recruitment, retention and deregistering as foster carers.</i> |
| <p>2.4 <i>What engagement or consultation has been undertaken as part of this EIA and with whom? What were the results?</i></p> | <ul style="list-style-type: none"> ● <i>Strategic needs assessment engagement with practitioners, young people, and foster carers.</i> ● <i>Ongoing engagement with regional partners on fostering reform.</i> ● <i>Internal collaboration across commissioning, housing, fostering, and social care teams.</i> |
| <p>2.5 <i>If you are planning to undertake any consultation in the future regarding this service or policy, how will you include equality considerations within this?</i></p> | <ul style="list-style-type: none"> ● <i>Targeted engagement with foster carers (existing and prospective).</i> ● <i>Engagement with disabled children and families on short breaks redesign.</i> ● <i>Consultation with care-experienced young people on accommodation planning.</i> ● <i>Ensuring accessible formats for families with SEND, language barriers, and digital exclusion.</i> |

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 |
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| <p>3.1 Issues relating to all groups and protected characteristics</p> | <p>Positive impacts:</p> <ul style="list-style-type: none"> • Increased access to local, stable placements reduces disruption. • Improved quality and sufficiency of provision. • Clearer pathways and improved support for care-experienced young people. | <p>Potential negative impacts:</p> <ul style="list-style-type: none"> • Transitional disruption during changes in processes, business cases, or policy updates. <p>Mitigation:</p> <ul style="list-style-type: none"> • Careful sequencing of workstreams and ongoing communication. |
| <p>3.2 Sex – identify the impact/potential impact of the policy on women and men.</p> | <p>Positive Impacts :</p> <ul style="list-style-type: none"> • Strengthened fostering, residential and missing-from-care practice supports girls and boys equally; domestic abuse considerations integrated into reunification planning. | <p>Risk:</p> <ul style="list-style-type: none"> • Disproportionate risks for adolescent girls in exploitation cohorts. <p>Mitigation:</p> <ul style="list-style-type: none"> • Targeted training and placement matching. |
| <p>3.3 Pregnancy and maternity</p> | <p>Relevant for:</p> | <p>Risk:</p> <ul style="list-style-type: none"> • Temporary disruption |

| 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 |
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| | <ul style="list-style-type: none"> • <i>Parent and child residential placements</i> • <i>Care-experienced young mothers</i> <p>Positive: <i>Better accommodation pathways and stability.</i></p> | <p>Mitigation:</p> <ul style="list-style-type: none"> • <i>Case-by-case planning.</i> |
| <p>3.4 Gender reassignment – <i>identify the impact/potential impact of the policy on transgender people</i></p> | <ul style="list-style-type: none"> • <i>Improved placement stability and trauma-informed care supportive of trans young people.</i> | <p>Risk:</p> <ul style="list-style-type: none"> • <i>Lack of specialist knowledge in some placement providers</i> <p>Mitigation:</p> <ul style="list-style-type: none"> • <i>Training and provider engagement</i> |
| <p>3.5 Disability – <i>identify the impact/potential impact of the policy on disabled people (ensure consideration of physical, sensory and mental health needs/differences)</i></p> | <p>Positive:</p> <ul style="list-style-type: none"> • <i>Dedicated workstream for short breaks and direct payments.</i> • <i>Strategic needs assessment strengthens compliance with statutory duty.</i> | <p>Risks:</p> <ul style="list-style-type: none"> • <i>Risk of gaps during transition.</i> <p>Mitigation:</p> <ul style="list-style-type: none"> • <i>Prioritise disabled children in planning and commissioning.</i> |
| <p>3.6 Age – <i>identify the impact/potential impact of the policy on different age groups</i></p> | <p>Positive:</p> | <p>Risks:</p> <ul style="list-style-type: none"> • <i>Transition points (16–18 and 18–25) particularly vulnerable.</i> |

| 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 |
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| | <ul style="list-style-type: none"> • <i>Improved sufficiency across all age groups (0–17).</i> • <i>Stronger accommodation planning for 16+ young pe</i> | <p>Mitigation:</p> <ul style="list-style-type: none"> • <i>Housing partnership and tailored pathways</i> |
| <p>3.7 Race – <i>identify the impact/potential impact on across different ethnic groups</i></p> | <p>Positive:</p> <ul style="list-style-type: none"> • <i>More culturally appropriate placements for UASC.</i> • <i>Regional fostering recruitment may widen diversity of carers.</i> | <p>Risks:</p> <ul style="list-style-type: none"> • <i>Risk of poor cultural match in placements.</i> <p>Mitigation:</p> <ul style="list-style-type: none"> • <i>Enhanced matching and targeted recruitment of carers.</i> |
| <p>3.8 Sexual orientation – <i>identify the impact/potential impact of the policy on lesbian, gay, bisexual, heterosexual, questioning people</i></p> | <p>Positive:</p> <ul style="list-style-type: none"> • <i>Stability improvements support LGBTQ+ young people</i> | <p>Risks:</p> <ul style="list-style-type: none"> • <i>Some providers may lack confidence supporting LGBTQ+ young people.</i> <p>Mitigation:</p> <ul style="list-style-type: none"> • <i>Provider training and standards</i> |
| <p>3.9 Marriage and civil partnership – <i>does the policy/strategy treat married and civil partnered people equally?</i></p> | <p><i>No negative impacts identified. The service treats all families equally.</i></p> | |

| 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 |
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| <p>3.10 Religion/belief – <i>identify the impact/potential impact of the policy on people of different religious/faith groups and also upon those with no religion.</i></p> | <p>Positive:</p> <ul style="list-style-type: none"> • <i>Cultural/faith considerations strengthened in placement matching.</i> | <p>Risks:</p> <ul style="list-style-type: none"> • <i>Ongoing need to improve access to culturally suitable placements.</i> <p>Mitigation:</p> <ul style="list-style-type: none"> • <i>Recruitment strategy includes diversity focus.</i> |
| <p>3.11 Socio-economically disadvantaged* – <i>identify the impact on people who are disadvantaged due to factors like family background, educational attainment, neighbourhood, employment status can influence life chances</i> (this is not a legal requirement, but is a local priority).</p> | <p>Positive:</p> <ul style="list-style-type: none"> • <i>Increased local placements reduce educational disruption and financial strain on families.</i> • <i>Support for SGO allowance alignment reduces inequality for kinship carers.</i> | <p>Risks:</p> <ul style="list-style-type: none"> • <i>Carers made face financial pressures during policy transitions.</i> <p>Mitigation:</p> <ul style="list-style-type: none"> • <i>Business cases addressing allowances and council tax reduction.</i> |
| <p>3.12 Rural communities* <i>identify the impact / potential impact on people living in rural communities</i></p> | | <p>Risks:</p> <ul style="list-style-type: none"> • <i>Reduced availability of placements in rural areas.</i> <p>Mitigation:</p> <ul style="list-style-type: none"> • <i>Targeted recruitment and localised provision planning where appropriate.</i> |

| 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 |
|---|--|---|
| <p>3.13 Armed Forces Community ** <i>servicing 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).</i></p> | | <p><i>No adverse impacts identified.</i></p> <p><i>Potential to improve accommodation access for children from military families.</i></p> |
| <p>3.14 Care Experienced *** <i>This working definition is currently under review and therefore subject to change:</i></p> <p><i>In B&NES, you are ‘care-experienced’ if you spent any time in your childhood in 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.</i></p> | <p>Positive:</p> <ul style="list-style-type: none"> • <i>Enhanced 16+ accommodation strategy.</i> • <i>Cohort analysis supports tailored planning.</i> • <i>Reinforced reunification where safe.</i> | <p>Risk:</p> <ul style="list-style-type: none"> • <i>Disruption during system changes.</i> <p>Mitigation:</p> <ul style="list-style-type: none"> • <i>Consistent personal adviser and placement stability planning.</i> |

**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 |
|---|---|-----------------------------------|--|---------------------------|
| <i>Transitional disruption during sufficiency reforms</i> | <i>Sequenced implementation plan with risk controls</i> | <i>Workstream plans finalised</i> | <i>Programme Board</i> | <i>2026</i> |
| <i>Gaps in short breaks access</i> | <i>Complete strategic needs assessment and commissioning plan</i> | <i>Assessment completed</i> | <i>Programme Team</i> | <i>Summer 2026</i> |
| <i>Insufficient cultural match for UASC</i> | <i>Targeted foster carer recruitment strategy</i> | <i>New campaign launched</i> | <i>Care Outcomes Service/Programme Team</i> | <i>Spring Summer 2026</i> |
| <i>Variation in financial support for carers</i> | <i>Business cases for SGO allowance alignment and council tax reduction</i> | <i>Cabinet approval sought</i> | <i>Commissioning Hub</i> | <i>2026</i> |
| <i>Consistency of accommodation for 16+ cohort</i> | <i>16+ accommodation strategy with Housing</i> | <i>Final strategy signed off</i> | <i>Care Outcomes Services/Programme Team</i> | <i>Summer 2026</i> |

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: Jean Kelly
Date: 2nd March 2026