

H&F Equality Impact Analysis Tool

Conducting an Equality Impact Analysis

An EIA is an improvement process which helps to determine whether our policies, practices, or new proposals will impact on, or affect different groups or communities. It enables officers to assess whether the impacts are positive, negative, or unlikely to have a significant impact on each of the protected characteristic groups.

The tool is informed by the <u>public sector equality duty</u> which came into force in April 2011. The duty highlights three areas in which public bodies must show compliance. It states that a public authority must, in the exercise of its functions, have due regard to the need to:

- 1. Eliminate discrimination, harassment, victimisation, and any other conduct that is prohibited under the Equality Act 2010
- 2. Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it
- 3. Foster good relations between persons who share a relevant protected characteristic and persons who do not share it

Whilst working on your Equality Impact Assessment, you must analyse your proposal against these three tenets.

General points

- 1. In the case of matters such as service closures or reductions, considerable thought will need to be given to any potential equality impacts. Case law has established that due regard cannot be demonstrated after the decision has been taken. Your EIA should be considered at the outset and throughout the development of your proposal, it should demonstrably inform the decision, and be made available when the decision is recommended.
- 2. Wherever appropriate, the outcome of the EIA should be summarised in the Cabinet/Cabinet Member report and equalities issues dealt with and cross referenced as appropriate within the report.
- 3. Equalities duties are fertile ground for litigation and a failure to deal with them properly can result in considerable delay, expense, and reputational damage.
- 4. Where dealing with obvious equalities issues e.g. changing services to disabled people/children, take care not to lose sight of other less obvious issues for other protected groups.
- 5. If you already know that your decision is likely to be of high relevance to equality and/or be of high public interest, you should contact the Strategy & Communities team for support.

Further advice and guidance can be accessed online and on the intranet:

https://www.gov.uk/government/publications/public-sector-equality-duty

https://officesharedservice.sharepoint.com/sites/Governance/SitePages/Reports.aspx

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| Overall Information | Details of Full Equality Impact Analysis |
|-------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Financial Year and | FY25/26 Q2 |
| Quarter | |
| Name and details of | Title of EIA: Speech and Language Therapy, Clinical Commissioning Group Ongoing Contribution |
| policy, strategy, | |
| function, project, activity, or programme | This paper seeks approval for the Local Authority's continued financial contribution to the long-standing Speech and Language Therapy (SALT) contract held by the North West London Integrated Care Board (NW ICB), delivered by Central London Community Healthcare NHS Trust (CLCH). It includes funding for statutory SALT services for children and young people with Education, Health and Care Plans (EHCPs), as well as an additional contribution to support an integrated Speech Therapist post within the Council's Joint Communication Team. The paper outlines the strategic importance of this provision in meeting statutory duties, promoting early intervention, and improving access to services, particularly for children who may not meet EHCP thresholds. |
| Lead Officer | Name: Hannah Parrott Position: Commissioning and Contracts Officer Email: hannah.parrott@lbhf.gov.uk |
| Date of completion of final EIA | 08/09/25 (pre-procurement) |

| Section 02 | Scoping of Full EIA | |
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| Plan for completion | Timing/Resources: | |
| | | |
| | This paper seeks to confirm the Local Authority's contribution towards joint SALT services between 2025 and 20230. | |

Analyse the impact of the policy, strategy, function, project, activity, or programme Analyse the impact of the policy on the protected characteristics (including where people / groups may appear in more than one protected characteristic). You should use this to determine whether the policy will have a positive, neutral, or negative impact on equality, giving due regard to relevance and proportionality.

| Protected characteristic | Analysis | Impact: Positive, Negative, Neutral |
|--------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------|
| Age | This proposal is expected to have a positive impact on the protected characteristic of age, particularly for children and young people with Special Educational Needs and Disabilities (SEND). Access to timely and appropriate Speech and Language Therapy (SALT) is critical to supporting their communication development and educational progress. Without this provision, young people are at greater risk of falling behind their peers, which can have long-term implications for their learning, confidence, and life outcomes. The continuation of this contract ensures equitable access to essential support, enabling all children, regardless of need, to participate fully in education and achieve their ambitions. | Positive |
| Disability | This proposal will have a positive impact on the protected characteristic of disability, as it directly supports children and young people with SEND, particularly those with speech, language and communication needs. The continuation of this contract ensures access to specialist Speech and Language Therapy SALT services, which are essential for enabling these individuals to communicate effectively, engage in learning, and participate fully in school and community life. By maintaining and enhancing this provision, the Council is helping to reduce barriers to education and promote equity, ensuring that Disabled children and young people receive the tailored support they need to thrive. | Positive |
| Gender reassignment | The service is universally accessible and non-discriminatory, therefore no impacts are expected upon Gender Reassignment, Marriage and Civil Partnership or Pregnancy and Maternity. | Neutral |
| Marriage and Civil Partnership | | |

| Pregnancy and maternity | | Neutral |
|-------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------|
| Race | This proposal is expected to have a positive impact on the protected characteristic of race, particularly for children and young people from global majority backgrounds who also have SEND. These individuals often face compounded barriers to accessing support due to the intersection of racial inequality and identifying as Disabled. SALT, especially when delivered through an early intervention model, plays a critical role in addressing communication challenges that may otherwise hinder educational progress and social inclusion. By ensuring equitable access to SALT services, the Council is helping to reduce disparities in outcomes and promote inclusion for children from diverse backgrounds. This approach supports culturally responsive practice and helps ensure that all children, regardless of ethnicity or need, can thrive in education and beyond. | Positive |
| Religion/belief (including non- belief) Sex Sexual Orientation | The service is universally accessible and non-discriminatory; therefore no impacts are expected upon Religion/belief, Sex or sexual orientation. | Neutral |

Human Rights or Children's Rights

If your decision has the potential to affect Human Rights or Children's Rights, please contact your Equality Lead for advice

Will it affect Human Rights, as defined by the Human Rights Act 1998? Yes / No

Will it affect Children's Rights, as defined by the UNCRC (1992)? Yes/No

| Section 03 | Analysis of relevant data Examples of data can range from census data to customer satisfaction surveys. Data should involve specialist data and information and where possible, be disaggregated by different equality strands. |
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| Documents and data reviewed | The ICB regularly review SEND data and service access data across the Nort West London region to ensure equitable access to SALT provision. This data forms part of their contract monitoring arrangements and is used to inform service development and engagement. |
| New research | No new research |

| Section 04 | Consultation |
|-----------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Consultation | As part of the ICB's contract management for SALT services, qualitative user feedback is gathered via survey's in order to inform service development and improve equity of access to SALT provision. |
| Analysis of consultation outcomes | N/A |

| Section 05 | Analysis of impact and outcomes |
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| Analysis | The continuation of funding for Speech and Language Therapy (SALT) services is expected to have a broadly positive impact across several protected characteristics, particularly age, disability, and race. The service supports children and young people with SEND, ensuring equitable access to education and helping prevent them from falling behind their peers. It provides tailored support for those with communication needs, promoting inclusion and improving long-term outcomes. The early intervention model, delivered through the Joint Communication Team, enhances accessibility by removing barriers such as the need for an EHCP. This is especially beneficial for children from global majority backgrounds who may face additional systemic challenges, ensuring culturally responsive and inclusive provision. Overall, the proposal strengthens the Council's commitment to equity, inclusion, and improved life chances for all children and young people. |

| Section 06 | Reducing any adverse impacts and recommendations |
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| Outcome of Analysis | No adverse impacts identified. |
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| Section 07 | Action Plan |
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| Action Plan | Monitor service access by race and SEND status annually during contract monitoring meetings. |
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| Section 08 | Agreement, publication and monitoring | |
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| Senior Managers' sign- | Name: Sarah Sanderson | |
| off | Position: Operational Director of Children and Young people | |
| | Email: sarah.sanderson@lbhf.gov.uk | |
| Key Decision Report | Date of report to Cabinet Member: TBC | |
| (if relevant) | Key equalities issues have been included: Yes/ No | |
| Equalities Advice | Yvonne Okiyo | |
| (where involved) | Strategic Lead Equity, Diversity and Inclusion | |
| | Yvonne.Okiyo@lbhf.gov.uk | |
| | 15.09.25 | |