

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 [public sector equality duty](#) 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:

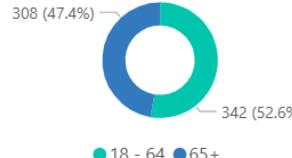
<https://www.gov.uk/government/publications/public-sector-equality-duty>

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

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Overall Information	Details of Full Equality Impact Analysis
Financial Year and Quarter	Q2 / 2025/6
Name and details of policy, strategy, function, project, activity, or programme	<p>Title of EIA: Direct Payment Support Service (DPSS) Procurement Strategy Short summary: The procurement strategy for the recommissioning of the Direct Payments Support Service contract. The Direct Payment Support Service provides residents who use direct payments with a range of services including advice and training. The strategy sets out a new vision for the service which will maximise the opportunities that DPs offer and support DP users to better meet their personal outcomes, enabling every resident to access high-quality, person-centred support that empowers every resident with increased choice in their care so they can live as independently as possible for as long as possible.</p>
Lead Officer	<p>Name: Lydia Sabatini Position: Programme Lead – Social Care Commissioning Email: Lydia.Sabatini@lbhf.gov.uk Telephone No: 07747 564694</p>
Date of completion of final EIA	27/10/2025

Section 02	Scoping of Full EIA		
Plan for completion	<p>Timing: Resources: BI data, previous EIAs,</p>		
Analyse the impact of the policy, strategy, function, project, activity, or programme	<p>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.</p>		
	Protected characteristic	Analysis	Impact: Positive, Negative, Neutral

	Age	<p>According to BI Dashboard:</p> <p>As the strategy plans to increase DP use and outcomes this will disproportionately affect residents as they disproportionately use DPs. This is disproportionate to the population where 10.3% in the census are recorded as being 65+. It will also increase DP take up in younger age groups, giving those residents more choice in their care.</p>  <table border="1"> <thead> <tr> <th>Age Band</th> <th>Count</th> <th>Percentage</th> </tr> </thead> <tbody> <tr> <td>18 - 64</td> <td>308</td> <td>47.4%</td> </tr> <tr> <td>65+</td> <td>342</td> <td>52.6%</td> </tr> </tbody> </table> <p>65+</p>	Age Band	Count	Percentage	18 - 64	308	47.4%	65+	342	52.6%	Positive
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18 - 64	308	47.4%										
65+	342	52.6%										
Disability	<p>We have no information about disability profile of DP users in H&F so conclusions cannot be drawn however DP users as people with care needs and as disproportionately older people are inherently more likely to identify as Disabled than the general population. Therefore this strategy which will maximise personal outcomes and independent living for users will have a positive impact on Disabled people specifically.</p> <p>In 2021, 7.4% of Hammersmith and Fulham residents were identified as Disabled. This figure decreased from 10.1% in 2011. These are age-standardised proportions.</p>	Positive										
Gender reassignment	<p>We have no information currently about gender reassignment status of DP users in H&F so conclusions cannot be drawn.</p> <p>The next service provider will be required to ask residents for voluntary equalities monitoring during service registration or feedback processes and use this data alongside proxy indicators (e.g. borough-level data, service user surveys) to make more informed assessments about how they can better reach and serve groups in the borough with protected characteristics. The next service</p>	Neutral- no change										

		will be instructed to work with local advocacy groups to understand barriers and needs for this characteristic.													
	Marriage and Civil Partnership	<p>We have no current information about marriage and civil partnership status of DP users in H&F so conclusions cannot be drawn.</p> <p>The next service provider will be required to ask residents for voluntary/anonymised equalities monitoring during service registration or feedback processes and use this data alongside proxy indicators (e.g. borough-level data, service user surveys) to make more informed assessments about how they can better reach and serve groups in the borough with protected characteristics. The next service will be instructed to work with local advocacy groups to understand barriers and needs for this characteristic.</p>	Neutral- no change												
	Pregnancy and maternity	<p>We have no information about pregnancy and maternity status of DP users in H&F so conclusions cannot be drawn.</p> <p>The next service provider will be required to ask residents for voluntary/anonymised equalities monitoring during service registration or feedback processes and use this data alongside proxy indicators (e.g. borough-level data, service user surveys) to make more informed assessments about how they can better reach and serve groups in the borough with protected characteristics. The next service will be instructed to work with local advocacy groups to understand barriers and needs for this characteristic.</p>	Neutral- no change												
	Race	<p>Census data for race in Hammersmith and Fulham.</p> <table> <thead> <tr> <th>Classification</th> <th>2021_Hammersmith and Fulham_%</th> </tr> </thead> <tbody> <tr> <td>Asian, Asian British or Asian Welsh</td> <td>10.5</td> </tr> <tr> <td>Black, Black British, Black Welsh, Caribbean or African</td> <td>12.3</td> </tr> <tr> <td>Mixed or Multiple ethnic groups</td> <td>6.7</td> </tr> <tr> <td>White</td> <td>63.2</td> </tr> <tr> <td>Other ethnic groups</td> <td>7.3</td> </tr> </tbody> </table>	Classification	2021_Hammersmith and Fulham_%	Asian, Asian British or Asian Welsh	10.5	Black, Black British, Black Welsh, Caribbean or African	12.3	Mixed or Multiple ethnic groups	6.7	White	63.2	Other ethnic groups	7.3	Neutral- no change
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	<p>We do not have information on the race or ethnicity of DP users in H&F so conclusions cannot be drawn. The next service provider will be required to ask residents for voluntary/anonymised equalities monitoring during service registration or feedback processes and use this data alongside proxy indicators (e.g. borough-level data, service user surveys) to make more informed assessments about how they can better reach and serve groups in the borough with protected characteristics.</p> <p>Cultural competence training will be mandated for provider staff as part of the specification. Equalities training will be offered to provider staff and PAs</p> <p>The specification and KPIs will require providers to report on service usage by protected groups and make a plan to proactively increase service use by groups that are disproportionately underrepresented. All complaints, including those touching on inclusion and equality issues, will be monitored and reported. Users will be surveyed regularly to ensure their satisfaction with the service and any equalities issues will be reported and picked up as part of contract monitoring.</p> <p>The service must be culturally competent and responsive to the needs of residents from diverse racial, ethnic, and religious backgrounds. Providers will be expected to demonstrate in the tender how they will ensure equitable access, culturally appropriate support, and sensitivity to religious practices in care planning and delivery.</p>	
	<p>Religion/belief (including non-belief)</p> <p>There are no specific DP user statistics so conclusions can't be drawn but generally in the borough: In 2021, 45.7% of people in Hammersmith and Fulham described themselves as Christian (down from 54.1%), while 11.6% described themselves as Muslim (up from 10.0% the decade before). Equalities training for staff will be required in the specification and equalities training offered to PAs</p> <p>The specification and KPIs will require providers to report on service usage by protected groups and make a plan to proactively increase service use by groups that are disproportionately underrepresented. All complaints, including those touching on inclusion and equality issues, will be monitored and reported. Users</p>	Neutral- no change

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	<p>Sex</p> <p>We have no information about sex of DP users in H&F so conclusions cannot be drawn.</p> <p>Equalities training for staff will be required in the specification and equalities training offered to PAs</p> <p>The next service provider will be required to ask residents for voluntary/anonymised equalities monitoring during service registration or feedback processes and use this data alongside proxy indicators (e.g. borough-level data, service user surveys) to make more informed assessments about how they can better reach and serve groups in the borough with protected characteristics.</p>	Neutral- no change
	<p>Sexual Orientation</p> <p>We have no information about sexual orientation status of DP users in H&F so conclusions cannot be drawn.</p> <p>Equalities training for staff will be required in the specification and equalities training offered to PAs</p> <p>The next service provider will be required to ask residents for voluntary/anonymised equalities monitoring during service registration or feedback processes and use this data alongside proxy indicators (e.g. borough-</p>	Neutral- no change

	<p>level data, service user surveys) to make more informed assessments about how they can better reach and serve groups in the borough with protected characteristics. The next service will be instructed to work with local advocacy groups to understand barriers and needs for this characteristic.</p>	
	<p>Care Leavers</p>	<p>We have no information about care leaver status of DP users in H&F so conclusions cannot be drawn.</p> <p>Equalities training for staff will be required in the specification and equalities training offered to PAs</p> <p>The next service provider will be required to ask residents for voluntary/anonymised equalities monitoring during service registration or feedback processes and use this data alongside proxy indicators (e.g. borough-level data, service user surveys) to make more informed assessments about how they can better reach and serve groups in the borough with protected characteristics. The next service will be instructed to work with local advocacy groups to understand barriers and needs for this characteristic.</p>
<p>Human Rights or Children's Rights</p> <p>If your decision has the potential to affect Human Rights or Children's Rights, please contact your Equality Lead for advice</p> <p>Will it affect Human Rights, as defined by the Human Rights Act 1998?</p> <p>No</p> <p>Will it affect Children's Rights, as defined by the UNCRC (1992)?</p> <p>No</p>		

<p>Section 03</p>	<p>Analysis of relevant data</p> <p>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.</p>
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Documents and data reviewed	BI ASC Services Dashboard, accessed 27/10/25 Census Data 2021, Office of National Statistics How life has changed in Hammersmith and Fulham: Census 2021 (ons.gov.uk)
New research	If new research is required, please complete this section

Section 04	Consultation
Consultation	Details of consultation findings (if consultation is required. If not, please move to section 06)
Analysis of consultation outcomes	N/A

Section 05	Analysis of impact and outcomes
Analysis	Analysis on each characteristic is in Section 2.

Section 06	Reducing any adverse impacts and recommendations
Outcome of Analysis	No adverse impact- neutral or positive only. Actions to be taken detailed below.

Section 07	Action Plan					
Action Plan	Note: You will only need to use this section if you have identified actions as a result of your analysis					
	Issue identified	Action (s) to be taken	When	Lead officer and department	Expected outcome	Date added to business/service plan

	Monitoring and Accountability	Add KPIs: uptake of services, satisfaction levels, complaints broken down by protected characteristics	When spec is being developed Nov 25-Dec25	Lydia Sabatini, Programme Lead, ASC Commissioning	Data will become available for monitoring equalities impacts and once service begins there will be increase in service use by groups that are disproportionately underrepresented	
	Diverse service providers	Outreach to Black Asian Multi Ethnic-led and faith-based organisations during tender promotion. Include a question in the tender about how providers will engage with and support diverse communities.	When ITT questions are being developed Nov 25-Dec 25	Lydia Sabatini, Programme Lead, ASC Commissioning	Winning tenderer will have a comprehensive plan to form partnerships including with groups that represent individuals with protected characteristics Culturally competent services that meet the needs of all users and increase use by underrepresented communities	
	Lack of data for some unrepresented groups can lead	Collect or request anonymised demographic	Included as part of spec and finalised during mobilisation	Lydia Sabatini, Programme Lead, ASC Commissioning	Data will increase ability of service to	

	<p>to potential barriers (e.g. language, mistrust of services, lack of awareness).</p>	<p>data from current DP users to better understand service reach and barriers. This will be reviewed quarterly at monitoring meetings so data collection process, data analysis and actions taken in response to underrepresentation can be monitored throughout the year. The provider will be responsible for acting on findings..</p> <p>Consider voluntary equalities monitoring during service registration or feedback processes.</p> <p>Use proxy indicators (e.g. borough-level</p>			<p>tailor services to people's needs</p>	
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		data, service user surveys) to make more informed assessments.				
		Cultural competence training for staff and Pas to include awareness of dietary, prayer, and holiday observances in care planning.	Will be included in spec and take place when service begins June 2026	Lydia Sabatini, Programme Lead, ASC Commissioning	Training will increase staff awareness of equalities issues and how to get direct payment users the services that meet all of their cultural needs	
		Ability to match service users with PAs who understand their cultural or religious needs.	Will be included in spec and take place when service delivery begins June 2026	Lydia Sabatini, Programme Lead, ASC Commissioning	Residents will meet more of their personal outcomes and increase their wellbeing when services are matched to their cultural needs	

Section 08	Agreement, publication and monitoring
Senior Managers' sign-off	Name: Johan van Wijgerden Position: Strategic Lead Email: johan.vanwijgerden@lbhf.gov.uk Telephone No: Considered at relevant DMT: Yes
Key Decision Report (if relevant)	Date of report to Cabinet/Cabinet Member: 10 / 11 / 25 Key equalities issues have been included: Yes
Equalities Advice (where involved)	Name: Yvonne Okiyo Position: Strategic Lead Equity, Diversity and Inclusion Date advice / guidance given: 17 th December 2025

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