



Equality Impact Assessment Record Form 2012-16

This form is to be used for recording the Equality Impact Assessment (EIA) of Council activities. It should be used in conjunction with the guidance on carrying out EIA in **Annex 2** of the Equality Scheme. The activities that may be subject to EIA are set out in the guidance.

EIA is particularly important in supporting the Council to make fair decisions. The Public Sector Equality Duty requires the Council to have regard to the need to eliminate discrimination, harassment and victimisation, advance equality of opportunity and foster good relations.

Using this form will help Council officers to carry out EIA in an effective and transparent way and provide decision-makers with full information on the potential impact of their decisions. The purpose is to avoid inadvertent disadvantage or discrimination resulting from decisions.

EIA is not a fixed process – it will vary according to the scale and type of activity. The form and guidance are designed to cover all eventualities. Officers should not be discouraged by the form, but should use their discretion in using it flexibly according to the activity they are assessing.

EIA does not happen at a single point in time. It is an ongoing and integral part of the development of the activity or proposal. This EIA template should be kept open and live as a planning document, and updated as the activity or proposal progresses.

Section 1 – Service Details and Summary of EIA Activity

Title of activity:	Social Fund Localisation Transformation Project
Lead Officer responsible for this EIA:	Peter Akers
Telephone:	Ex2249
Service Group:	Corporate
Service or Team:	Transformation
Assistant Director accountable for this EIA	Chris Sivers
Who else will be involved in carrying out the EIA:	Anthony Sandys Helen Watson Mary Hall Deena Wallace Sarah Andrews Josh Slack Richard Gosling

What stage has the EIA reached?

This table provides a 'cover note' of progress to be maintained as the EIA is developed over time.

Stage categories 1-3 listed below refer to the funnel model. Note the stage reached and any consultation or engagement carried out. Simple activities may not need all these stages. Provide details of population/individuals affected in Section 2

Stage	Date	Summary of position
Stage 1: Initial Officer Assessment. Whole Population likely to be affected identified	10.1.12	Applications can be made by those over 18 but beneficiaries will often include children and young people.
Stage 2: Further Assessment. Target Population likely to be affected identified	31.3.12	The local Social Fund designed to support an applicant or a member of their family who has one of the following vulnerabilities: <ul style="list-style-type: none"> a) They have a serious physical health problem, which they are receiving treatment for b) They have dependent children who normally live with them and that child's health would be at immediate risk c) They are homeless, or at risk of homelessness d) They have a substance or alcohol misuse problem, which they are receiving treatment or support for e) They are on probation or receiving support relating to their

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		<p>offending history</p> <p>f) They are affected by, or at risk of domestic abuse</p> <p>g) They have a learning disability</p> <p>h) They have a physical or sensory impairment</p> <p>i) They have a mental health problem, which they are receiving treatment or support for</p> <p>j) They are an older person with support needs</p> <p>This criteria has been agreed based on detailed consultation with key local stakeholders about those who health is at greatest risk during a financial crisis.</p>
Stage 3: Further Assessment. Individuals likely to be affected identified	31.5.12	<p>Support through the service should be a one off event from someone in financial crisis who's health is at risk or who needs help to move back into or remain in the community. As a result of the ad-hoc nature of service usage the specific individuals who will use the service cannot be indentified.</p> <p>In response to the difficulty in identifying specific service users the EIA has focused on engaging with stakeholders as a proxy.</p> <p>Detailed user profile data will be collected as part of PI's for the service to improve future EIAs.</p>
Stage 4: Analysis of Findings	17.8.12	<p>Being pregnant, an army leaver or having a gambling addiction have not been included as direct qualifying criteria for receiving support</p> <p>Policy is not clear about how Disability Related Expenditure will be taken into account when completing a financial assessment. This may result in those with such expenditure failing to be identified as in financial crisis.</p> <p>People who are not already engaged with services will have greater difficulty evidencing their need and this may result in hard to reach groups receiving less support through the scheme</p> <p>Will individuals who cannot use phone, email or get to town hall be restricted in their ability to receive support?</p> <p>Crises that happen after 4.30 pm and before 8.30am or over weekends cannot be supported immediately.</p> <p>The policy does not offer support for the provision of specialist items. This may disproportionately impact disabled applicants with specialist support needs.</p> <p>Will assumed or real prejudices prevent applicants of certain sexual orientations, genders and faiths from accessing support if support provided by faith based agencies?</p>
Stage 5: Sign-Off		<p>Peter Akers</p> <p>Chris Sivers</p>
Stage 6: Reporting and Action Planning		<p>Social Fund Steering Group will continue to monitor EIA of service using key and will deliver relevant actions resulting from monitoring.</p>

Section 2 – The Activity and Supporting Information

<p>Details of the activity (including the main purpose and aims)</p>
<p>The local Social Fund service is designed to support the most vulnerable clients who are in financial need. Support is separated into:</p> <ul style="list-style-type: none"> (a) Crisis Support which aims to prevent a immediate determination to an applicant's health by providing short-terms access to food and limited supplies of clothing and baby consumables such as nappies and milk (b) Community Care Support aims to help applicants remain in the community or move back into the community after a period in supported or unsettled accommodation. It does this by providing access to a range of standard items such as beds, bedding, furniture and white goods.
<p>Who will be affected by the activity?</p> <p>See the guidance on carrying out equality impact assessment within the Equality Scheme 2012-16. Provide details of the groups and numbers of people affected below, updating the table as the EIA develops and the understanding of who will be affected emerges in more detail.</p>
<p>Whole population</p>
<p>105600</p>
<p>Target population</p>
<p>The local Social Fund designed to support an applicant or a member of their family who has one of the following vulnerabilities:</p> <p>All data has been provided by the Joint Strategic Needs Assessment 2010/11 unless otherwise stated.</p> <p>a) They have a serious physical health problem, which they are receiving treatment for As of March 2009 Darlington Adult Social Care Supported 3300 service users. As of March 2009 Darlington dealt with 1440 contacts from new clients. 79.4 % of Service users have physical disabilities.</p> <p>b) They have dependent children who normally live with them and that child's health is at immediate risk There are 21,827 children in Darlington between 0-18 years of age</p> <p>c) They are homeless, or at risk of homelessness 15 People accepted as being homeless and in Priority Need 0.34 Number per 1000 households</p> <p>d) They have a substance or alcohol misuse problem, which they are receiving treatment or support for It is estimated that there are up to 700 young people in Darlington who need specialist treatment for drug or alcohol Use. There are around 660 estimated problem drug users in Darlington</p> <p>e) They are on probation or receiving support relating to their offending history Durham police research shows that across County Durham and Darlington, the 18-24 age range committed 30% of crime; although they only represent 10% of the population.</p> <p>In 2009/2010 Darlington YOS dealt with a total of 199 young offenders who committed 461 offences. 156</p>

(78%) were male and 43 (22%) female.

f) They are affected by, or at risk of domestic abuse

It is estimated that between 1800 and 4500 women in Darlington are victims of domestic abuse each year.

g) They have a learning disability

In 2010 there were 390 children with SEN statements attending Darlington's schools (a decrease of 40 on the previous year).

There are estimated to be 1.2 million people in England with a mild or moderate learning disability, a rate of one person in every 40. This ratio would equate to approximately 2500 people with a learning disability in Darlington. These figures do not take into account those people with a learning disability whose condition is such that they do not come into contact with mainstream health or social care services, and therefore the exact numbers of people with a learning disability are unknown.

h) They have a physical or sensory impairment

2821 individuals with a physical or sensory impairment are receiving Adult Social Care services

Data from RAP return (Referrals, Assessments and Packages of Care) for the period April 2011 to March 2012.

i) They have a mental health problem, which they are receiving treatment or support for

Severe mental illness affects around 0.8% of Darlington's population (approximately 800 people).

j) They are an older person with support needs

2595 individuals over the age of 64 are receiving Adult Social Care services

Data from RAP return (Referrals, Assessments and Packages of Care) for the period April 2011 to March 2012.

Individuals

Support through the service should be a one off event from someone in financial crisis who's health is at risk or who needs help to move back into or remain in the community. As a result of the ad-hoc nature of service usage the specific individuals who will use the service cannot be identified.

In response to the difficulty in identifying specific service users the EIA has focused on engaging with stakeholders as a proxy.

Detailed user profile data will be collected as part of PI's for the service to improve future EIAs.

The DWP have provided very limited profiling data on the type of applicants for the Social Fund. Analysis of this data shows that the majority of applicants in Darlington for Crisis Loans (CL) are single, aged between 18-34 and have no children under the age of 16. Community Care Grants (CCG) have similar usage trends but with a slightly higher number of applicants who are lone parents or couples. See Appendix 1 for a full breakdown of the DWP profiling data provided.

What data, research and other evidence or information is available which is relevant to the EIA?

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DWP Local 2011-12 Social Fund Annual Report

DWP Community Care Grants: A qualitative view of attitudes and behaviours

DWP Social Fund use amongst older people

DWP Experiences and consequences of being refused a Community Care Grant

DWP Social Fund Localisation Data

Check: before proceeding to the officer assessment, have you obtained all the data and information that is currently available?

Section 3: Officer Assessment

Use this table to record your views on potential impact on Protected Characteristics. As the activity and the assessment develop your views may change – record them here. It is important to be searching and honest about this – many Council activities are planned to be of positive benefit to identified target groups but can often have the potential for inadvertent effects on other groups.

Protected Characteristics	Potential Impact Positive/Negative/ Not Applicable			Potential level of impact				Summary of Impact
	P	N	NA	H	M	L	nil	
Age	P	N	NA	H	M	L	nil	All applicants will be awarded support based on need.
Race	P	N	NA	H	M	L	nil	Impact assessment work noted that the requirement to evidence need may make it difficult for ethnicities who do not currently engage with services. All applicants will be awarded support based on need.
Sex	P	N	NA	H	M	L	nil	Impact assessment work identified that pregnancy was not identified as a qualifying vulnerability. All applicants will be awarded support based on need.
Gender Reassignment	P	N	NA	H	M	L	nil	There is a risk that assumed or real prejudices will prevent applicants who have or are in the process of receiving genders reassignment from accessing support if support provided by faith based agencies. All applicants will be awarded support based on need.
Disability (summary of detail on next page)	P	N	NA	H	M	L	nil	Specialist providers supporting those with disabilities from public, private and voluntary sector will be able to make referrals to the social fund. This referral will act as evidence that the applicant meets the qualifying criteria and will only require a financial assessment to receive support. It should be noted that a negative impact of the local scheme is that the DWP potentially considered awards for specialist equipment even if these had been refused by the relevant health of social care assessment teams. The local service will only provide standard items and the need for any specialist support or equipment will need to be assessed by the relevant health or social

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								<p>care teams.</p> <p>All applicants will be awarded support based on need.</p>
Religion or belief	P	N	NA	H	M	L	nil	<p>There is a risk that assumed or real prejudices will prevent applicants of different faiths from accessing support if support provided by faith based agencies.</p> <p>All applicants will be awarded support based on need.</p>
Sexual Orientation	P	N	NA	H	M	L	nil	<p>There is a risk that assumed or real prejudices will prevent applicants of different sexual orientations from accessing support if support provided by faith based agencies.</p> <p>All applicants will be awarded support based on need.</p>
Pregnancy or maternity	P	N	NA	H	M	L	nil	<p>Impact assessment work identified that pregnancy was not identified as a qualifying vulnerability.</p> <p>All applicants will be awarded support based on need.</p>
Marriage/ Civil Partnership	P	N	NA	H	M	L	nil	<p>Married couples and Civil Partnership will be able to access the service and the impact assessment work did not identified any disproportionately positive or negative impacts for these groups.</p> <p>All applicants will be awarded support based on need.</p>

Section 3: Officer Assessment - continued

The Council must have due regard to disabled people’s impairments when making decisions about ‘activities’. This list is provided only as a starting point to assist officers with the assessment process. It is important to remember that people with similar impairments may in reality experience completely different impacts. Consider the potential impacts and summarise in the Disability section on the previous page. Officers should consider how the ‘activity’ may affect a disabled person.

Mobility Impairment	P	N	NA	H	M	L	nil	<p>This has been reflected in the disability section overleaf.</p> <p>It should be noted that applications can be made of advocates or through home visits. This will help those with disabilities from calling the crisis line directly, on travelling to the town hall to receive a face to face assessment.</p> <p>Consideration has been made to ensure that all items of support can be delivered and installed (where required).</p>
Visual impairment	P	N	NA	H	M	L	nil	
Hearing impairment	P	N	NA	H	M	L	nil	
Learning Disability	P	N	NA	H	M	L	nil	
Mental Health	P	N	NA	H	M	L	nil	
Long Term Limiting Illness	P	N	NA	H	M	L	nil	
Multiple Impairments	P	N	NA	H	M	L	nil	
Other - Specify	P	N	NA	H	M	L	nil	

Cumulative Impacts

The officer responsible for this EIA should seek input from the Corporate Equalities Group on the potential for this activity to combine with other recent, current or proposed activities, both Council and in the external environment, to result in more severe impacts on people with Protected Characteristics through their cumulative effects. The Corporate Equalities Group will advise on the content for this section of the EIA.

Change activities	Potential cumulative impacts
MTFP proposal - Carers Support Review of services	'Disabled People', 'Age' and 'Carers' will have reduced access to benefit information. This may increase demand for the local social fund service at a time when the grant level has been reduced
MTFP proposal - Household waste	May impact low income households and so increase demand for local social fund service.
MTFP proposal - Financial Protection Service	Reduce income for disabled people so potential increase demand for local social fund service
MTFP proposal - Welfare Rights	40 people will no longer receive support at appeal and longer

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	waiting times. Likely to lead to increased demand for social fund.
MTFP proposal - Supported Buses	Cost of getting to doctors was identified at £14 per trip. If critical and individual on low income may be forced to apply to the social fund to prevent deterioration to health. Particularly relevant to age and disability.
MTFP proposal - Council Tax rise of 3.5%	Impact on low income household which may increase number of households in financial crisis.
Welfare Reforms	<p>Welfare reforms will lead to an reduction in yearly benefit payments in Darlington by £14m per year from April 2013. Those most effected by the benefit reductions are:</p> <ol style="list-style-type: none"> a. Children and young people; b. Disabled people and their carers; c. Older people; d. Lower income families, and e. Lone parents. <p>Each of these client groups are likely to experience a financial crisis as a result of the welfare reforms and as a result seek support from the local social fund.</p>

Section 4: Engagement Decision

The decision about who to engage with, and how and when to engage, is the key to effective EIA. Please see Annex 2 of the Equality Scheme for guidance on the engagement decision.

<p>Is engagement with affected people with Protected Characteristics required, now or during the further development of the activity?</p>	<p>Yes</p>
<p>If YES, proceed to the next section. If NO, briefly summarise below the reasons why you have reached this conclusion.</p>	
<p>Support through the service should be a one off event from someone in financial crisis who's health is at risk or who needs help to move back into or remain in the community. As a result of the ad-hoc nature of service usage the specific individuals who will use the service cannot be indentified.</p> <p>In response to the difficulty in identifying specific service users the EIA has focused on engaging with stakeholders as a proxy.</p> <p>Detailed user profile data will be collected as part of PI's for the service to improve future EIAs.</p>	

If you have come to the conclusion that engagement is not required, seek ratification from the Corporate Equalities Group through your service Equalities Co-ordinator.

If engagement is not required but the officer assessment has identified changes that should be made to the activity, please complete Sections 7 and 8. If not the assessment can be signed-off at Section 9.

Any reports to decision-makers during the development of the activity, for example feasibility or options appraisal reports, should include content on the latest thinking and findings of the EIA even though, like the activity, further development of the EIA may be required before final reporting.

The findings of the officer assessment should be included in any reports to decision-makers. These may be feasibility or options appraisal reports where the activity is at an early stage of development, but it is essential that any equality findings are taken into account in formal decisions at all stages of development of the activity.

Section 5 – Involvement and Engagement Planning

Has the assessment shown that the activity will treat any groups of people with Protected Characteristics differently from other people? Yes
If yes, please state which groups and how The standard assessment routes for applicants will be through a referral agencies or through using the crisis phone number and eform. However Applications can be made face to face at the town hall, by advocates or through home visits for those with disabilities that prevent them using one of the standard assessment routes.

From the above, prepare a simple plan using the template overleaf for involving and engaging with the organisations, groups and individuals likely to be affected by the activity.

There may be several stages of involvement and engagement, particularly for more complex activities. Initially it may be possible to identify and engage only with stakeholder and representative organisations for the people with Protected Characteristics who may be affected. Further development of the activity may be required before the individuals who will be affected can be identified.

The Involvement and Engagement Plan should evolve accordingly, with new engagement proposals added as they are identified.

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Involvement and Engagement Plan			
Which organisations, groups and individuals do you need to involve or engage and how?			
Date of plan entry	Organisation, Group or Individuals	Date of event or activity	Type of activity – venue, channels, method and staffing
9.1.12	<ul style="list-style-type: none"> • Darlington Association on Disability; • Darlington Borough Council's Leaving Care Team; • Darlington Borough Council's Housing Options Team; • Age UK; • Family Help; • Darlington CAB; • Darlington Association on Disability; • Darlington Borough Council Housing Benefits Team; • 700 Club; • Housing Tenancy Support; • Housing Tenancy Management, and • First Stop Darlington. 	27.2.12	<p>Wider welfare reforms engagement event. Purpose to raise awareness reforms and understand how Social Fund fits within local context.</p> <p>Dolphin Centre. Presentation and workshops. Led by People Strategy and Performance.</p>
20.2.12	<ul style="list-style-type: none"> • 700 Club • Dimensions • Hanover Housing • RSACC • AbbeyField • DISC • Harbour • Sancutuary • Age UK • ED Walker Homes • Housing 21 • Shelter • Allied Care • Endeavour Housing • Job Centre • St Hildas • Anchor Housing 	10.4.12	<p>Purpose to work with support providers evaluate impact of current DWP and identify key design principles for the localised service.</p> <p>4 Workshops at Dolphin Centre led by Transformation Team.</p>

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	<ul style="list-style-type: none"> • Evolution • Keyring • Three Rivers HIA • CAB • Fabrick • Kings Church • Town Mission Guild • Carewatch • Family Help • Mencap • UBU • Carr Gomm • Family Nurse Partnership • Mind • United Response • Creative Support • First Stop • NHS • WRVS • Credit Union • Foundation • Potensial • YMCA • DAD • FRADE • Railway Housing • DBC • Gold • Richmond Fellowship 		
10.4.12	<ul style="list-style-type: none"> • 700 Club • First Stop • Sanctuary Support • Family Help • Sure Start (Parents Group) • YMCA • Age UK • DAD • DAD Young Leaders • LD Partnership Board • Carers Steering Group Support Service • Mencap • MIND • Connexions • Town Mission • Credit Union • CAB • Welfare Rights • FRADE 	29.5.12	<p>Purpose to evaluate proposed delivery options</p> <p>Workshop with providers at DBC committee room and visits to providers to engage service users. Led by Equalities and Communities Team.</p>

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	<ul style="list-style-type: none"> • BME Network • Community Partnerships • West Park Hospital • Reflections • NECA • DAAT • Tenant's Board • Probation Service 		
9.7.12	<ul style="list-style-type: none"> • 700 Club • First Stop • Sanctuary Support • Family Help • Sure Start (Parents Group) • YMCA • Age UK • DAD • DAD Young Leaders • LD Partnership Board • Carers Steering Group Support Service • Mencap • MIND • Connexions • Town Mission • Credit Union • CAB • Welfare Rights • FRADE • BME Network • Community Partnerships • West Park Hospital • Reflections • NECA • DAAT • Tenant's Board • Probation Service 	17.8.12	Purpose to evaluate detailed policy, processes and assessment criteria. Workshop at Dolphin Centre led by Equalities and Communities Team.

Engagement to identify impacts works best in face-to-face and small group settings

Section 6: Engagement Findings

Drawing on the engagement findings and your understanding of the effects of the activity, indicate how it will contribute, if at all, to the three strands of the Public Sector Equality Duty.

<p>a) How will the proposal help to eliminate discrimination, harassment and victimisation?</p>
<p>By engagement of key service providers as specialist referral agencies the local service will improve accessibility and awareness of the service for groups with low usage of the current DWP service</p> <p>The local service will be open to all based on need whatever there protected characteristic(s)</p>
<p>b) How will the proposal help to advance equality of opportunity?</p>
<p>The aim of the local scheme is to ensure vulnerable groups do not suffer serious deteriorations to their health or independence as a result of a financial crisis.</p>
<p>c) How will the proposal help to foster good relations?</p>
<p>N/A</p>

<p>During the engagement process were there any suggestions on how to avoid, minimise or mitigate any negative impacts? If so, please give details.</p>
<p>Suggestion</p> <p>Change policy so that those with gambling addictions and those who are pregnant or army leavers are included within the qualifying criteria.</p> <p>Response</p> <p>Policy revised to include those who are pregnant as directly meeting the qualifying criteria. Army leavers and those with gambling addictions were not included as qualifying criteria designed to highlight those who's health is at greatest risk during a financial crisis and there is no reason to assume army leavers and those with gambling addictions are a greater risk than the general population. Both army leavers and those with gambling addictions will be supported if they meet another of the qualifying criteria and financial assessment.</p> <p>Suggestion</p> <p>Change policy to ensure disability related expenditure is taken into account when completing the financial assessment.</p> <p>Response</p>

Adopted

Suggestion

Change policy to offer support to purchase specialist items such as adjustable beds, grab rails etc.

Response

No change to policy as health and social care responsible for identifying specialist items required to support an individual to live independently. Local social fund must not overlap with existing assessments.

Suggestion

Provide out of hours and weekend crisis support

Response

Administration budget provided by the DWP for the local service cannot fund an out-of-ours and weekend crisis support. Work will continue to provide effective signposting for answer machine service and potential to provide small number of food vouchers to specialist service providers that are open over the weekend.

Suggestion

Offer a range of providers for each items or service offered by the local Social Fund to improve accessibility.

Response

Multiple providers will be available for each item or service. All providers will be expected to meet the LA equalities standards.

This completes the assessment, but there will be further work to do to contribute to the reporting and implementation stages of the activity. First though, it is important to draw a line under the assessment to maintain a separation between assessment of impacts and any proposals to manage those impacts. The assessment should therefore be signed-off at this stage.

Section 7 - Sign-off when assessment is completed

Officer Completing the Form:		
Signed	Name:	
	Date:	
	Job Title:	
Assistant Director:		
Signed	Name:	
	Date:	
	Service:	

Section 8 – Reporting of Findings and Recommendations to Decision Makers

The findings of the EIA may be reported to decision-makers at several stages during the development of an activity. For example, the initial officer assessment findings may be included in a feasibility report or options appraisal to be considered by the Transformation Board or Chief Officers' Executive.

Any report for formal decisions by Cabinet or Council should include the latest findings of the EIA, even if these are at a relatively early stage. The report recommending final approval of the activity should await and include the findings of the completed EIA. The report should present clearly the impacts that have been identified through the engagement process, including potential cumulative impacts.

The report may include recommendations based on the findings of the EIA, but these should be separate from the reporting of impacts. Recommendations will be developed separately from the EIA and arise from considering equalities impacts combined with other aspects of the activity such as finance, the benefits of the activity, and so on.

Based on the EIA findings, the report may consider the options in the table below, but the report must contain a clear statement of the impacts so that decision-makers can understand the effects of the decision that is being recommended.

What does the review of the information show?	
a)	No negative impact on people because of their Protected Characteristics - continue with the activity and monitor progress on implementation
b)	Negative impact identified – recommend continuing with the activity; clearly specify the people affected and the impacts, and providing reasons and supporting evidence for the

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decision to continue	
c)	Negative impact identified - adjust the activity in light of the identified impact to avoid, minimise or mitigate the impact
d)	Negative impact identified - stop activity and provide an explanation why

Section 9 – Action Plan and Performance Management

The report to decision-makers, and the decision made may require actions to be taken to avoid, minimise or mitigate the negative impacts of the activity. Option C in the table in Section 8, combined with mitigation measures that may have been highlighted during engagement and listed in Section 6 (if adopted) will require action planning to implement them.

Any actions to address equalities impacts should be listed below, with performance management review proposals, to complete the full EIA.

What is the negative impact?	Actions required to reduce/eliminate the negative impact (if applicable)	Who will lead on action	Target completion date
A number of actions have been taken to resolve negative impact as outlined in section 6.			
Ongoing consultation and performance monitoring will continue to take place to monitor impact of local service.	Detailed PI data collected analysed and reported to local Social Fund steering group.	Anthony Sandys	Monthly from April 2013
	Twice yearly engagement with key stakeholders to discuss impact of local Social Fund service.	Anthony Sandys	Twice yearly from October 2013
	Assessment of Social Fund service as part of contract monitoring with Supporting People providers	Helen Watson	Monthly from April 2013

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Performance Management	
Date of the next review of the EIA	Every 6 months
How often will the EIA action plan be reviewed?	
Who will carry out this review?	Anthony Sandys Helen Watson