

Appendix 2 - Steps to Work Equality Impact Analysis

Title of Project/Service/Policy	Steps to Work programme
Team/Department	Learning Disability Directly Provided Services
Directorate	Adult Social Care and Health (ASCH)
Provide a comprehensive description of your Project (Service/Policy, etc.) including its Purpose and Scope	Summary of changes to original proposal The original proposal was to close the Steps to Work service and to stop supporting the adults currently using the service. Those adults in paid or unpaid work would be able to carry on in their roles, whilst those accessing pre-employment training or actively seeking employment could be found employment support from the independent sector. As a result of the consultation processes, the original proposal has been reviewed and a revised proposal has been recommended. The change that is proposed is to retain four job coaches and align these posts to the ASCH Learning Disability Directly Provided (LDDPS) day services, in effect re-provisioning the employment support internally and still achieving the cost savings. Maintaining a supported employment provision internally would: • Reduce the disruption for adults and their parent/carers, ensuring continuity of support for those currently accessing Steps to Work • Maintain the choice available for adults requiring employment support with an ESCC provision complimenting supported employment services in the independent sector • Continue to contribute to the Council's objectives around employment as a social care outcome • Reduce the impact on Care Management resource. Risks identified for the original proposal included: • Alternative Supported Employment providers are unable to offer the support required due to capacity or location.

	• Adults accessing the service will not want the alternatives offered and not receive support to find employment. • Adults currently in work will struggle to maintain their employment without the on-going support provided by Steps to Work. These risks would be mitigated through retaining job coaches and aligning these with the LDDPS Day Services. This would ensure that adults currently receiving a service from Steps to Work could continue with this support and create capacity for adults requiring this support in the future. The impact of the revised recommendation will lessen disruption to people using the services and will mitigate issues identified. Original Proposal Steps to Work provides training to prepare adults for work, and support to find, and retain, employment, matching job coaches with people who use care and support to achieve this. There are 65 adults accessing support from Steps to Work, 40 of whom are 'active'. Referrals are received from the CLDT and NST with the criteria being for adults with a Learning Disability and/or and autism diagnosis. The service has a dedicated 'Employer engagement' role to identify and foster relationships with local employers to provide the employment opportunities. The Steps to Work service sits within ASCH Learning Disability Directly Provided Services (LDDPS). LDDPS support over 500 adults across East Sussex. This support is offered in a number of different service areas: including day services, community support services, respite services, Shared Lives and supported accommodation. As part of the ASCH savings plan a proposal was made to close the service. The original proposal suggested that adults could be found alternative employment support from the independent sector. As above the proposal being recommended to Cabinet has now been revised to recommend keeping some support for employment provision within LDDPS. Adults with Learning Disabilities and their Carers will be affected by the proposal.
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1. Update on previous EqlAs and outcomes of previous actions (if applicable)

What actions did you plan last time? (List them from the previous EqlA)	What improved as a result? What outcomes have these actions achieved?	What <u>further</u> actions do you need to take? (add these to the Action Plan below)
No previous EqlA available	N/A	N/A

2. Review of information, equality analysis and potential actions

Consider the actual or potential impact of your project (service, or policy) against each of the equality characteristics.

Protected characteristics groups under the Equality Act 2010	What do you know? Summary of data about your service-users and/or staff	What do people tell you? Summary of service-user and/or staff feedback	What does this mean? Impacts identified from data and feedback (actual and potential)	What can you do? All potential actions to: • advance equality of opportunity, • eliminate discrimination, and • foster good relations								
Age	According to the 2021 Census, the proportion of the population of East Sussex aged 65 and over now stands at 26.1%, up from 22.7% in 2011. Proportion of Population by age range (%): East Sussex <table><tr><td>0-19</td><td>20-44</td><td>45-64</td><td>65+</td></tr><tr><td>21</td><td>25</td><td>28</td><td>26</td></tr></table>	0-19	20-44	45-64	65+	21	25	28	26	Consultation respondents' ages ranged from 24 to 80 years, with an average of 46 years. Responses from those aged 25 to 34 formed the single largest group (9; 16%).	There is a smaller proportion of those aged 65+ compared to the population of the county and people receiving long term support overall. This is to be expected as this service is aimed at those of working age and life expectancy is considerably	No specific mitigations required for this characteristic.
0-19	20-44	45-64	65+									
21	25	28	26									

	England 23 33 26 18 <u>According to Age UK</u>, three out of ten people aged 65 to 74 and two-thirds of those aged 75 and over are not online. The age range of adults participating is: • 20-30 23 • 31-40 30 • 41-50 6 • 51-65 6 The number of young people with a learning disability who will be turning 18 and transitioning to ASC are: • this financial year (2024-2025): 10 (4 of these are 18 already, 6 are 17 years old), (2 of the 10 are external referrals so did not transfer from CDS) • 2025-2026: 14 • 2026-2027: 15		lower for people with a learning disability.	
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Disability	In the 2021 census, 20.3% of East Sussex residents were living with a long-term physical or mental health condition or impairment that affected their ability to carry out day-to-day activities in 2021, the same proportion as in 2011 (compares to 18% for England & Wales). 34.8% of households in East Sussex had at least one member identifying as disabled under the Equality Act in 2021. The number of working age adults with a Primary Support Reason of Learning Disability Support receiving community-based services during the year 2023/4 is 1068. According to Ofcom research, people with a learning disability are most likely to say that their use of TVs or computers is either limited or completely prevented due to their condition. Nearly two in ten (18%) said their use of TVs or computers was limited or prevented, while around one in ten said the same for the internet, landline, smartphones or simple mobile phones.	Over a third of respondents to the consultation have a physical or mental health condition or long-term illness (21; 38%). They told us that disruption and isolation caused if this proposal went ahead would cause distress and affect mental health. NHS Sussex told us that the direct impact to health and health services is assessed as low but noted the potential longer-term impact to wellbeing and demand for greater support in the absence of this service. One person using the service told us that “It will be confusing to use another service, and I won’t feel as confident. My life will be less happy.” Another told us “I wouldn’t be able to get a job. I wouldn’t have anything to do and my mental health would suffer.”	All adults accessing the services included in the proposals have a learning disability or have recognised additional needs. Some people have further complexities such as sensory impairment, physical disabilities and other health problems which may impact on them further. A change in how services are provided may cause people anxiety and less opportunity for social interaction and ongoing skills development. Any changes agreed could also cause adults emotional and/ or psychological distress. There may be an increased reliance on other services for example, health services.	By retaining a county wide supported employment offer provided by Learning Disability Directly Provided Services we can mitigate or remove the identified impacts on adults with disabilities and their carers. Ensure information is given in an appropriate and accessible format. Staff should be available to support those who need it to process the information. Advocacy services will be offered. Any additional support or service required due to disability will be picked up within the individual review that is proposed.
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	All adults have a learning disability, some with autism or a neurological condition. Nine adults have been diagnosed with autism (one with additional physical needs, one with a neurological disability, and one with aspergers), 3 with additional physical needs, 2 with a neurological disability, one with aspergers and another with downs syndrome. - 16 people who use care and support in total. One person cannot read or write.			
Gender reassignment	The 2021 East Sussex Lesbian Gay Bisexual Trans Queer + (LGBTQ+)¹ Comprehensive Needs Assessment estimates that there may be 5,572 Trans and Gender Diverse (TGD) people (1% of the population) living in East Sussex 2021 Census: 1640 residents declared their gender identity was different to that assigned at birth which is 0.4% of the population. Data tells us that there are no people with this protected characteristic	No responses were received in terms of impact upon those with this protected characteristic.	No people are recorded with this protected characteristic.	If there were adults with this protected characteristic, any support needs would be picked up during the individual reviews or assessment and appropriate support would be provided

Pregnancy and maternity	There are just under 5,000 births per year in East Sussex. Hastings has the highest overall birth rate as well as for women aged 15-19 years. Lewes and then Rother have the highest birth rates for women aged 35-44 years. Data tells us that there are no people with this protected characteristic	No responses were received in terms of impact upon those with this protected characteristic.	No adults are recorded with this protected characteristic.	If there were adults with this protected characteristic, any support needs would be picked up during the individual reviews or assessment and appropriate support would be provided.
Race (ethnicity) Including migrants, refugees and asylum seekers	88.3% of usual residents of East Sussex said that they belonged to the White: English, Welsh, Scottish, Northern Irish or British ethnic group. Black and minority ethnic groups including white minority groups (Irish, Gypsy or Irish Traveller, Roma, Other White) make up 11.7% of usual residents in East Sussex. This compares to 18.8% in England. In 2021, 93.9% (512,440) of usual residents in East Sussex identified their ethnic group within the high-level "White" category, a decrease from 96.0% (505,420) in the 2011 Census, but still significantly higher than the English national average (81.0%) and also	No responses were received in terms of impact upon those with this protected characteristic.	This data broadly reflects the County's population and overall ASC service user data.	Access Translation and Interpreting services if required, ensure staff are aware of the process. Culturally appropriate services to be considered as part of the individual review of needs as required.

	higher than the average for the South East region (86.6%). 4.6% were of another white background; 1.6% were Asian/ Asian British, 0.5% were Black/ Black British and 1.3% were from other ethnic backgrounds. Those selecting a non-UK identity only accounted for 5.5% of the overall population (29,880 people), which is an increase from 4.3% of the population (23,090 people) in 2011. The most common non-UK identities are Polish, Irish, Romanian, Portuguese and Italian. A higher percentage of the population in East Sussex identified as Gypsy or Irish Traveller than the national average (0.2% compared to 0.1%). Data available shows following people using the service: • White British 59 • Black/Black British – Caribbean 1 • Mixed - White And Black Caribbean 2 • White - Any Other Background 2			
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Religion or belief	In 2021, 45.9% (250,330) of usual residents of East Sussex identified as Christian, down from 59.9% (315,650) in 2011. The second most common religion in East Sussex after Christianity is Islam. The proportion of the population stating they were Muslim increased from 0.8% of the usual resident population (4,200) in 2011 to 1.1% (6,190) in 2021. This is low compared to both the South East Regional and the English national averages, with 3.3% of residents in the South East specified their religion as Islam, and 6.7% across the whole of England. Details of the impact upon religion and belief on ASC: Religion and Belief in Health and Social Care Assessments – We do not routinely collect this information for adults. However, where an adult requests a specific need to be supported with their religion this is recorded on their support plan.	No responses were received in terms of impact upon those with this protected characteristic.	No data is available on this protected characteristic.	Ensure any support requirements relating to religion or belief are identified via the review process and recorded on support plans.
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Sex	Of the population of East Sussex, 299,064 (52%) are female and 270,788 (48%) are male. Data tells us that: • 10 are female • 37 are male	No responses were received in terms of impact upon those with this protected characteristic.	Females are under represented compared to the County's population. This indicates that men would be disproportionately affected by the proposal.	This data reflects referrals so no specific mitigation required for this characteristic.
Sexual orientation	The 2021 East Sussex LGBTQI+ Comprehensive Needs Assessment estimates that there may be between 17,273 and 39,004 LGB+ people living in East Sussex (between 3.1% and 7% of the population) According to the 2021 Census 3.3% of East Sussex residents declared themselves as LGB+. Of the data available: • 7 recorded as heterosexual • 1 bisexual • 1 prefer not to say • 28 not recorded or unsure	No responses were received in terms of impact upon those with this protected characteristic.	Limited data is available for this protected characteristic.	Ensure any support requirements relating to sexual orientation are identified via the review process and recorded on support plans. Improve data collection for this characteristic.
Marriage and civil partnership	According to 2021 census data for East Sussex: • Single 29% • Married 46.5% • Civil Partnership 0.4%	No responses were received in terms of impact upon those with this protected characteristic.	There are no adults recorded with this protected characteristic.	N/A

	• Divorced 11% • Widowed 8% Twelve adults are recorded as single, data is unavailable for the remainder.			
Armed Forces	In 2021, 21,173 people in East Sussex reported that they had previously served in the UK armed forces (4.6% of usual residents aged 16 years and over). There were 19,917 households (8.3% of all households) in East Sussex with at least one person who had served in the UK armed forces. Whilst adults have not served in the Armed Forces, it is not known whether anyone in their households has.	No responses were received in terms of impact upon those with this protected characteristic.	No adults are recorded with this characteristic.	N/A
Impacts on community cohesion	The service works with local employers to build relationships and identify employment opportunities. It also runs the Shine car wash service at the Council's County Hall building in Lewes. Shine offers work experience and a range of transferable skills with the aim of helping people transition into paid employment.	Those responding to the consultation told us that people would lose confidence and become more isolated if the proposals are taken forward. It may also mean that less people with learning disabilities are represented amongst the working population.	The interaction with community organisations and employers will be lost. There will be an impact upon social skills, employability and qualifications.	By retaining a county wide supported employment offer provide by Learning Disability Directly Provided Services we can mitigate or remove the identified impacts on adults with disabilities and their carers. Alternative pre-employment training or employment support services can also

	This scheme provides an opportunity for adults to interact with and be visible in the community. Some gain qualifications.			be found through Department for Work and Pensions (DWP), Job Centre Plus or the voluntary and community sector. People with particular support needs may also be able to meet these in different ways such as through support from a Personal Assistant to maintain their employment. Our care management teams in adult social care would help people to access services as part of support planning.
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Additional categories

(identified locally as potentially causing / worsening inequality)

Characteristic	What do you know?	What do people tell you?	What does this mean?	What can you do?
Rurality	74% of the population in East Sussex lives in an urban area with the remaining 26% living in a rural area (2021 census). Adults live across the county, all in urban areas. A	No responses were received in terms of impact upon those with this characteristic.	Transport links and services are less available in some rural areas compared to larger towns, which may reduce the availability and choice of alternative services e.g. personal	The supported employment offer provided by ASCH Directly Provided Learning Disability Service will operate on a county wide footprint. Where necessary transport would be arranged by ASCH so that an adult

	map of home addresses is below:  LD%20STW%20map.docx		assistants, daytime opportunities should these be required. Any adults who live in rural areas may experience a sense of isolation and social contact.	could access the service as part of support planning.
Carers	There are over 10,000 persons claiming CA in East Sussex. (Source DWP Feb 2020). Care for the Carers estimates that there are 69,241 unpaid carers in East Sussex; it is difficult to know the actual number because many carers are hidden. Twenty adults live with carers or family, nine live alone, the remainder live in shared or residential accommodation. In total, 29 adults have unpaid carers.	Of those responding to the consultation, 12 (22%) care for a family member or friend. Carers and families told us they would be impacted by the changes and had a lack of resources to assist those adults into work themselves.	The proposals may cause additional stress on family environments and family life as a result of the change in how services are provided. Carers may also have other caring responsibilities for other family members e.g. children or other relatives..	By retaining a county wide supported employment offer provide by Learning Disability Directly Provided Services we can mitigate or remove the identified impacts for carers. Any carers affected will be offered assessments or reviews as appropriate.
Other groups that may be differently affected (including but not only: homeless people, substance users, care leavers)	East Sussex is fifth most deprived of 26 County Councils.13% of people aged 60 plus were living in poverty in 2019 (source	Wealden Citizens Advice told us during the consultation that they were concerned that this proposal would mean people benefitting from this	According to the Department for Work and Pensions, the employment rate for people with a learning disability is the lowest of any disability or	By retaining a county wide supported employment offer provide by Learning Disability Directly Provided Services we can mitigate or remove the identified

	Joint Strategic Needs Assessment). 10.3% of households were in fuel poverty in 2019 compared to 9.3 % in England. In East Sussex, of the adults who are in receipt of support for a learning disability, 5.7% are in paid employment, compared to 5.1% of people with a learning disability in England. This is significantly less than the 74% of all working adults and 54% of all disabled people.	service would be forced to go on benefits if they were no longer supported to find work.	health condition (25%). And analysis by the Trades Union Congress in November 2022 found that that the pay gap for disabled workers is currently at £2.05 an hour. Research by the British Association of Social Workers estimated that people with a learning disability spent more on things like transport, medication and energy than someone without a disability.	impacts on adults and their carers Learning Disability England has been running a cost of living hub . There is information on resources, campaigns, advice on staying warm & financial help in there.
Assessment of overall impacts and any further recommendations - include assessment of cumulative impacts (where a change in one service/policy/project may have an impact on another)				
The majority of independent sector employment support is in the east of the county and may not be a viable option for all adults currently engaged with Steps to Work. Adults may not receive support to find employment and there is therefore an ensuing risk that they will become de-skilled or isolated requiring higher levels of support. We received eighty-four responses to this consultation. The majority of people disagree with the proposal to close Steps to Work, including the Shine car wash. The service is immensely valued as a way of helping people get into work, and in building confidence. There is a view that no similar facility exists, with the service providing supported employment which other local providers do not. Key messages from the consultation were that people with learning disabilities looking for work will be negatively impacted, their mental health, social skills and levels of isolation will be affected. There were also concerns that there may not be suitable alternatives within the voluntary or private sector.				

If the original proposals are agreed, all adults who are affected would be offered an individual review to consider whether their support package, in light of service changes, continues to meet their assessed needs. The proposed reduction may also impact directly on carers' mental and physical health. As part of the individual service reviews mentioned above, carers would be offered a carer's assessment, or a review of their assessment, to determine whether support packages continue to meet their assessed need.

The revised option to retain job coaches through re-modelling the day service provision would retain the support available and mitigate the concerns raised.

We will communicate changes to adults and their parents/carers appropriately and will work with them to identify action needed. Communications' preferences will be met via the following options:

- All communication materials produced in 'Easy read' formats
- Any meetings about the changes for parents/carers will be scheduled to take place both during the day and in the evenings to provide flexibility for people who work during the day. Meetings will be held in a range of venues across the county.
- Easy read posters giving details of Advocacy support and scheduled Advocacy meetings
- Information in accessible format for those with sensory impairments

3. List detailed data and/or community feedback that informed your EqlA

Source and type of data (e.g. research, or direct engagement (interviews), responses to questionnaires, etc.)	Date	Gaps in data	Actions to fill these gaps: who else do you need to engage with? (add these to the Action Plan below, with a timeframe)
ESCC Public Consultation on the ESCC funding gap – (direct engagement) the public consultation took place during this time and feedback is included in the EqlA. The consultation report is included with the cabinet report.	03/10/2024-28/11/2024		

Inclusion Advisory Group and Disability Rights Reference Group (await outcomes)			
Disabled users access to and use of communication devices and services Research summary: Learning disability (Ofcom 2019)			
Public Health Learning Disability Profiles			
Spotlight on Poverty: People with Learning Disabilities BASW			
East Sussex in Figures – Data Observatory – Welcome to East Sussex in Figures			
Learning Disability - Health Inequalities Research Mencap			

4. Prioritised Action Plan

Impact identified and group(s) affected	Action planned	Expected outcome	Measure of success	Timeframe
All	Individual reviews of adult's support needs will be undertaken, where required, for everyone affected by the change in service provision.	Support plans updated to reflect changes in services.	Care and support needs continue to be met.	To reflect implementation of savings' proposals (all actions).
All	A transition plan is proposed to ensure that all adults experience a continuing level of support	As above.	As above.	
Disability	Consultation, information and guidance to be provided in accessible formats as required such as Easy Read and accessible to those with sensory impairments.	People who use our care and support have input into changes to services.	Support needs continue to be met.	
Carers	Carers reviews will also be undertaken as required.	Support plans updated to reflect changes in services.	Support needs continue to be met.	
All	Retain four job coaches and align these posts to the LD DPS day services, in effect re-provisioning the employment support internally	Reduce the impact upon people using the current service.	To be monitored via ongoing planned reviews	
Sexual orientation	Improve data collection on sexuality	Better information on sexual orientation of people with a learning disability	Better dataset on this characteristic	From March 2025