

# **Equality Impact Assessment / Equality Analysis**

**(Version 4)**

<b>Item name</b>	<b>Details</b>
<b>Title of Commissioned service</b>	Learning Disabilities, Autism and Neurodiversity Services Recommissioning
<b>Name of directorate and service</b>	Adult Social Care, Strategic Commissioning Hub
<b>Name and role of officers completing the EqIA</b>	Katie Smith, Live Well Commissioning and Projects Manager
<b>Date of assessment</b>	01/12/2025

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
<p>1.1 Briefly describe purpose of the service/policy e.g.</p> <ul style="list-style-type: none"> <li>● How the service/policy is delivered and by whom</li> <li>● If responsibility for its implementation is shared with other departments or organisations</li> <li>● Intended outcomes</li> </ul>	<p>This EQIA is related to the recommissioning of services to support adults with care and support needs who have learning disabilities and/or autism and neurodiversity (LDAN) in Bath &amp; North East Somerset (B&amp;NES). These services include:</p> <ul style="list-style-type: none"> <li>● Community-based day opportunities: Structured activities promoting skills, social inclusion, and wellbeing.</li> <li>● Supported living (accommodation-based and outreach): Tailored support for individuals in their own or shared accommodation to promote independence.</li> <li>● Supported housing: Short-term housing with on-site or visiting support for those transitioning to independent living.</li> <li>● Care homes: 24/7 personal care, support, and respite.</li> </ul> <p>The recommissioning of LDAN services, by the Strategic Commissioning Hub, will establish a long-term, sustainable commissioning model designed to enhance accessibility, safety, and flexibility for a diverse population with evolving health and social care needs.</p>

	<p>The intended outcomes are:</p> <ul style="list-style-type: none"> <li>• Co-production of new models of support, care, and housing.</li> <li>• Embed personalisation, choice and control, and co-production into service delivery (e.g., by using Individual Service Funds)</li> <li>• An increase in the number of people supported by community-based support and living in mainstream housing.</li> <li>• An increase in in-area/local supported living options enhanced by enablement and assistive technology.</li> <li>• An increase in the number of people supported in extra-care housing at the right time for them (instead of residential care).</li> <li>• A move away from spot purchasing arrangements to long-term commissioning frameworks which deliver best value.</li> </ul>
<p>1.2 Provide brief details of the scope of the policy or service being reviewed, for example:</p> <ul style="list-style-type: none"> <li>• Is it a new service/policy or review of an existing one?</li> <li>• Is it a national requirement?).</li> <li>• How much room for review is there?</li> </ul>	<p>The recommissioning of the existing LDAN services will give the opportunity to identify what matters most to people using services and address gaps in current provision. The aim is to promote innovative care models and responsive support, while addressing market gaps and adapting to changing requirements.</p> <p>The services are and will continue to be governed by a range of national statutory frameworks, including:</p> <ul style="list-style-type: none"> <li>• Care Act 2014</li> <li>• Mental Capacity Act 2005</li> <li>• Equality Act 2010</li> <li>• Health and Social Care Act 2008</li> <li>• Human Rights Act 1998</li> <li>• Modern Slavery Act 2015</li> <li>• Counter-Terrorism and Security Act 2015</li> <li>• Data Protection Act 2018 and GDPR</li> </ul>

	<p>These legal obligations ensure the services promote equality, safeguards vulnerable individuals, and meets national standards for care and support.</p> <p>The LDAN services will be recommissioned, creating a strategic window to evaluate performance, integrate lessons learned, and align future design with stakeholder priorities and emerging best practice.</p> <p>Once services are operational, services specifications and contractual obligations will allow for ongoing performance monitoring, annual reviews, and co-production with stakeholders, enabling iterative improvements and responsiveness to local needs.</p>
<p>1.3 Do the aims of this policy link to or conflict with any other policies of the Council?</p>	<p>There will be no conflict with any other policies within the Council.</p> <p>The LDAN recommissioning will be informed by national frameworks including The Good Lives Framework: Building Change Together (Learning Disabilities England) and Commissioning Services for People with a Learning Disability (Skills for Care), and align with other Council and B&amp;NES, Swindon and Wiltshire (BSW) Integrated Care Board (ICB) strategies, including:</p> <ul style="list-style-type: none"> <li>• B&amp;NES Joint Health and Wellbeing Strategy</li> <li>• B&amp;NES Adult Social Care Strategy</li> <li>• BSW Mental Health Strategy</li> <li>• BSW Dementia Delivery Plan</li> <li>• B&amp;NES Digital Strategy (in development)</li> <li>• B&amp;NES Autism Strategy (in development)</li> <li>• B&amp;NES Dementia Strategy (in development)</li> </ul>

## 2. Consideration of available data, research and information

Key questions	Data, research and information that you can refer to
<p><b>2.1</b> What equality focussed training have staff received to enable them to understand the needs of our diverse community?</p>	<p>All council employees are required to have mandatory Equalities training.</p> <p>It will be a contractual requirement for providers to ensure all staff within the commissioned services have Equalities and Diversity training.</p>
<p><b>2.2</b> What is the equality profile of service users?</p>	<p>The services which support adults with LDAN in B&amp;NES are designed to support a diverse population, including individuals with complex needs and those from vulnerable or marginalised groups. Services are designed to help people live independently, participate in their communities, and reach personal goals. Supported living and outreach enable individuals to stay in their own homes with tailored support. Day opportunities build skills and social inclusion. Care homes and respite services provide essential support for those with higher needs. High demand and effective use of support show the positive impact of these services on wellbeing and community involvement. There is a strong commitment to equality, diversity, and inclusion, ensuring services are accessible to all eligible adults, culturally sensitive and responsive to the needs of those with learning disabilities and/or autism and neurodiversity.</p> <ul style="list-style-type: none"> <li>• B&amp;NES has an estimated 5572 residents with learning disabilities and/or autism. This represents 3% of the B&amp;NES population<sup>1</sup>.</li> <li>• National research highlights the health inequalities people with learning disabilities and autism face. The median age of death was 62.9 years for people with a learning disability and 55 years for autistic people with a learning disability<sup>2</sup>. In the general population in B&amp;NES, life expectancy is 84.8 years for females and 80.3 years for males<sup>3</sup></li> <li>• There is also a higher prevalence of certain health conditions, including epilepsy, mental health disorders, and cardiovascular disease.</li> <li>• In B&amp;NES, just over 500 adults with learning disabilities and/or autism receive long term social care and support.</li> <li>• The majority who are supported are aged between 18-64. The average age of those receiving a service who have a learning disability is 41 years old. The average age of those receiving a service with autism is 32 years old.</li> </ul>

	<ul style="list-style-type: none"> <li>• Approximately 90% of individuals accessing learning disabilities and/or autism services identify as White.</li> <li>• Services predominantly support men, with 58% of individuals with a learning disability being male, 72% of those with autism being male, and 73% of those with both a learning disability and autism being male.</li> <li>• The numbers of adults with learning disabilities and autism in B&amp;NES are predicted to increase by 5% in the next 10 years and 11% in next 20 years.<sup>1</sup></li> </ul> <p><sup>1</sup> Projected Adult Needs Service, Institute of Public Care  <sup>2</sup> King's College London, <a href="#">LeDeR Annual Report Learning from Lives and Deaths: People with a Learning Disability and Autistic People 2022</a>, November 2023  <sup>3</sup> B&amp;NES Council Strategic Evidence Base, <a href="#">Demography and Life Expectancy</a></p>
<p><b>2.3</b> Are there any recent customer satisfaction surveys to refer to? What were the results? Are there any gaps? Or differences in experience/outcomes?</p>	<p>Commissioners seek customer feedback during planned quality assurance and contract monitoring activity.</p> <p>Providers are expected to undertake customer surveys yearly (at a minimum), with mechanisms in place to record the outcome, lessons learned, and changes in practice because of feedback received.</p>
<p><b>2.4</b> What engagement or consultation has been undertaken as part of this EIA and with whom? What were the results?</p>	<p>Co-production will be an integral part of the recommissioning LDAN services.</p>
<p><b>2.5</b> If you are planning to undertake any consultation in the future regarding this service or policy, how will you include equality considerations within this?</p>	<p>As part of the LDAN services recommissioning, services will be developed collaboratively with providers, people who use services, their families, and carers through workshops, focus groups, and ongoing feedback mechanisms. The co-production, engagement and consultation approach will be multi-faceted, inclusive, accessible and equitable. This approach will ensure that the services designed are person-centred, address equality consideration and grounded in the principle that those who use services are best placed to shape them.</p> <p>In addition, consultation and engagement will take place with:</p> <ul style="list-style-type: none"> <li>• B&amp;NES internal colleagues such as Finance, Legal, and Procurement</li> </ul>

	<ul style="list-style-type: none"> <li>• Practitioners and other care professionals such as social workers, reablement workers, BSW ICB and health colleagues</li> <li>• Other Local authorities, to identify best practice, local benchmarking, and innovative working that might be replicated in B&amp;NES.</li> </ul>
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### 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 will do 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><b>3.1 Issues relating to all groups</b> and protected characteristics</p>	<p>The recommissioning of LDAN services will be co-produced with people with lived experience and their carers. The aim is to create a process that actively engages a diverse range of voices, ensuring representation from varied backgrounds and communities. To achieve this, we will offer multiple, accessible ways for people to contribute, making participation as inclusive and meaningful as possible.</p> <p>New services will be designed to meet the needs of everyone while addressing any disparities in outcomes.</p>	<ul style="list-style-type: none"> <li>• Difficulties engaging individuals using service or who will need services in the future.</li> <li>• Expectation that individuals with complex needs can actively engage.</li> <li>• Mitigation: Commissioning of independent organisations to facilitate co-production.</li> </ul>

	Regular data monitoring ensures that any differences in access or outcomes are identified and addressed.	
<b>3.2 Sex</b> – identify the impact/potential impact of the policy on women and men.	LDAN services will continue to be available to both men and women, ensuring equitable access for all individuals and actively addressing disparities in outcomes. See 2.2 for B&NES data in reference to men and women.	<ul style="list-style-type: none"> <li>• Prevalence of learning disability and/or autism is greater in males.</li> <li>• Mitigation: Personalised care planning will reflect gender preferences, and gender-specific needs (e.g., bathing, dressing) will be respected.</li> </ul>
<b>3.3 Pregnancy and maternity</b>	<p>LDAN service delivery will support, and signpost to relevant health services, individuals' people who are pregnant or parenting who have support needs eligible for support under the Care Act.</p> <p>The ability to carry out caring responsibilities for a child is a statutory outcome and will be taken into consideration in determining support needs. LDAN services will liaise with Children's Services to ensure that pregnant or new parents are offered person centred support.</p> <p>LDAN services will consider the additional impact of pregnancy and maternity and additional care that the individual requires.</p>	<ul style="list-style-type: none"> <li>• Lack of tailored support for pregnant individuals in complex care situations.</li> <li>• Mitigation: Work alongside providers to ensure services address support needs for these individuals.</li> </ul>

<p><b>3.4 Gender reassignment</b> – identify the impact/potential impact of the policy on transgender people</p>	<p>LDAN service delivery will ensure a person-centred approach will be respectful of individuals gender identities and their pronouns will be used appropriately. Research has shown that autistic individuals are more likely to identify as transgender or gender-diverse compared to the general population (<a href="#">Transgender and gender-diverse individuals are more likely to be autistic and report higher autistic traits   University of Cambridge</a>)</p>	<ul style="list-style-type: none"> <li>• Risk of misgendering or lack of understanding from professionals.</li> <li>• Mitigation: LGBTQ+ awareness training and inclusive language policies.</li> </ul>
<p><b>3.5 Disability</b> – identify the impact/potential impact of the policy on disabled people (ensure consideration of physical, sensory and mental health needs/differences)</p>	<p>The recommissioning of LDAN services will identify and address any issues relating to disabilities with individuals raise during the co-production and engagement.</p> <p>A person-centred approach will aim to enable individual needs to be identified and a plan created to promote inclusion and empowerment.</p>	<ul style="list-style-type: none"> <li>• Inaccessible environments or communication.</li> <li>• Bias or assumptions may disadvantage some disabled people.</li> <li>• Mitigation: Co-produced services, and accessible communication formats.</li> </ul>
<p><b>3.6 Age</b> – identify the impact/potential impact of the policy on different age groups</p>	<p>The LDAN services will be available for adults of all ages including working age adults, older adults and young adults transitioning from children’s services.</p>	<ul style="list-style-type: none"> <li>• Service gaps where provision isn’t available.</li> <li>• Mitigation - Part of the recommissioning will be the development of a long-term plan to develop the LDAN provider market in B&amp;NES to ensure there is sufficient provision to accommodate people of all ages.</li> </ul>

<p><b>3.7 Race</b> – identify the impact/potential impact on across different ethnic groups</p>	<p>The recommissioning of LDAN services will promote equality by ensuring services are culturally sensitive and address the specific needs of people from all racial and ethnic backgrounds.</p> <p>Translation and Interpretation services will be used on request or whenever a need is known. This will support inclusion for non-English speaking people and people with sensory impairment.</p>	<ul style="list-style-type: none"> <li>• Cultural insensitivity.</li> <li>• Underrepresentation in workforce.</li> <li>• Mitigation: Inclusive service delivery, policies and training.</li> </ul>
<p><b>3.8 Sexual orientation</b> – identify the impact/potential impact of the policy on lesbian, gay, bisexual, heterosexual, questioning people</p>	<p>LDAN service delivery will respect individuals’ sexual orientation and be inclusive of LGBTQ+ individuals.</p> <p>Services are designed to address challenges such as discrimination, stigma, or mental health concerns in relation to maximising their health and wellbeing outcomes.</p>	<ul style="list-style-type: none"> <li>• Fear of discrimination or lack of understanding.</li> <li>• Mitigation: LGBTQ+ inclusive service delivery, policies and training.</li> </ul>
<p><b>3.9 Marriage and civil partnership</b> – does the policy/strategy treat married and civil partnered people equally?</p>	<p>The recommissioning of LDAN services will address any issues relating to marriage and civil partnerships raised during the co-production and engagement.</p> <p>It will be ensured that commissioned services do not discriminate based on marital or partnership status and that all families are treated equitably.</p>	<ul style="list-style-type: none"> <li>• No negative or differential impact currently identified.</li> </ul>
<p><b>3.10 Religion/belief</b> – identify the impact/potential impact of the policy on</p>	<p>LDAN service delivery will respect individuals’ religion/beliefs.</p>	<ul style="list-style-type: none"> <li>• Lack of awareness of religious practices.</li> </ul>

<p>people of different religious/faith groups and also upon those with no religion.</p>		<ul style="list-style-type: none"> <li>• Mitigation: Cultural competency training and culturally sensitive service delivery.</li> </ul>
<p><b>3.11 Socio-economically disadvantaged*</b> – identify the impact on people who are disadvantaged due to factors like family background, educational attainment, neighbourhood, employment status can influence life chances <b>(this is not a legal requirement but is a local priority).</b></p>	<p>The recommissioning of LDAN services will address any issues relating to socio-economically disadvantage people, raised during the co-production and engagement.</p> <p>Access to services is not impacted by economic status and individuals assessed under the Care Act are means-tested for a financial contribution.</p>	<ul style="list-style-type: none"> <li>• B&amp;NES includes areas of deprivation, which may impact experiences of health and social care. In particular, life expectancy in Twerton and Southdown wards is lower than England.</li> <li>• Individuals living in areas of deprivation may also find it harder to access services and may experience intersectionality, where various social identities intersect to create overlapping and unique experiences of discrimination and privilege.</li> </ul>
<p><b>3.12 Rural communities*</b> identify the impact / potential impact on people living in rural communities</p>	<p>The recommissioning or LDAN services will promote the development and access to services needed by people living in rural areas. This includes addressing issues such as geographical isolation, limited local resources, and travel barriers to accessing services.</p> <p>Monitoring and addressing the impact of rural isolation on well-being and service access is key to maximising health and wellbeing.</p>	<ul style="list-style-type: none"> <li>• Service gaps - Support services are currently concentrated in towns and cities.</li> <li>• Travel barriers can impact access to day opportunities and outreach services.</li> <li>• Mitigation - Part of the recommissioning will be the development of a long-term plan to develop the LDAN provider market in B&amp;NES to address service gaps and increase spread of services across B&amp;NES.</li> </ul>
<p><b>3.13 Armed Forces Community **</b> serving members; reservists; veterans and their families, including the</p>	<p>The recommissioning of LDAN services will address any issues relating to armed</p>	<p>No negative or differential impact currently identified.</p>

<p>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).</p>	<p>forces communities raised during the co-production and engagement.</p>	
<p><b>3.14 Care Experienced ***</b>  This working definition is currently under review and therefore subject to change:</p> <p>In B&amp;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.</p>	<p>The recommissioning of LDAN services will identify and address any issues relating to care experience individuals raised during the co-production and engagement.</p>	<p>Care leavers with LD&amp;A transitioning from children’s service to adult social care will have their eligible care and support needs identified through Care Act Assessments and person-centred transition planning.</p>

\*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 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. 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 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
<p>Ensuring that services are co-produced in collaboration with individuals who have lived experience and their families or advocates, engaging as many people as possible in the process.</p>	<ul style="list-style-type: none"> <li>• Commissioning specialist providers to facilitate a focused period of engagement and co-production with people who use services, their families and advocates. This will inform the design of the services.</li> <li>• Ongoing co-production and engagement throughout the recommissioning.</li> <li>• Offer different ways in which individuals can contribute and make it as accessible as possible.</li> </ul>	<ul style="list-style-type: none"> <li>• Develop and resource co-production plan</li> <li>• Start co-production engagement</li> <li>• Update plan following feedback</li> </ul>	<p>Kate Smith and Claire Hannan</p>	<p>Focused engagement by April 2026</p> <p>Ongoing co-production and engagement during 2026</p>

<p>Gaps in existing service provision, including location of services, services suitable for all ages.</p>	<ul style="list-style-type: none"> <li>• Development of long-term recommissioning plan to develop a provider market with services that address gaps identified.</li> </ul>	<ul style="list-style-type: none"> <li>• Continue market engagement and benchmarking</li> <li>• Update LDAN market position statement in response</li> <li>• Design commissioning framework and long-term commissioning plan</li> </ul>	<p>Claire Hannan</p>	<p>During 2026</p>
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## 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](mailto:equality@bathnes.gov.uk)), who will publish it on the Council's website. Keep a copy for your own records.

**Signed off by:** Natalia Lachkou, Assistant Director of Commissioning  
(Divisional Director or nominated senior officer)

**Date:** 30<sup>th</sup> January 2026