

City of Edinburgh Council

Record of Equality and Rights Impact Assessment

Part 1: Background and Information

(a) Background Details - Please list ERIA background details:

ERIA Title and Summary Description	<p>Economic Development Review of Subsidised Childcare:</p> <p>The City of Edinburgh Council has developed a Commissioning Strategy which highlights the priority areas for Council investment, including the provision of a childcare subsidy.</p> <p>The requirement for Economic Development to comply with the Commissioning Strategy and service planning provides an opportunity to review “employability focused” subsidised childcare. This review seeks to define impacts of current usage of funding and determine any gaps for households with children who are on low incomes.</p> <p>It also provides the opportunity to evaluate current funding arrangements, consult with service users and define a model that will ensure maximum impact of the subsidy and value for money. The review will then produce recommendations which will inform the future procurement of services.</p>		
Service Area	Division	Head of Service	Service Area Reference No.
Economic Development	Employability and Skills	Greg Ward	2017P48

(b) What is being impact assessed?

Describe the different policies or services (i.e. decisions, projects, programmes, policies, services, reviews, plans, functions or practices that relate to the Corporate ERIA Title):

Policies and Services	Date ERIA commenced
1. Economic Development Review of Subsidised Childcare	March 2013
2.	
3.	
4.	
5.	

(c) ERIA Team - Please list all ERIA Team Members:

Name	Organisation / Service Area
1. Vivienne Robinson	CEC, Employability and Skills, ED
2. Judith Fenton	CEC, Employability and Skills, ED
3. Ken Shaw	CEC, Employability and Skills, ED
4. Ricky Dover	CEC, Children and Families
5. Amanda Godsell	CEC, Children and Families
6. Jane Ramage	CEC, Children and Families
7. Gary Turner	CEC, Cooperative Development Unit
8. Neil Fraser	CEC, Procurement
9. Iain Rourke	Capital City Partnership
10. Nina Martyka	EVOG
11. Greg Ward	Director of Economic Development
12. Laura McIntyre	CEC, Equalities Officer

Part 2: Evidence and Impact Assessment

(a) Evidence Base – Please record the evidence used to support the ERIA. Any identified evidence gaps can be recorded at part 3(i). Please allocate an abbreviation for each piece of evidence.

Evidence – <i>show end service user perspective</i>	Abbreviation
<p>1. Detailed Desk Research</p> <p>Extensive and thorough review and analysis of current research on the subjects of child poverty; affordability of childcare; and parent views was undertaken to establish a sound baseline of knowledge.</p> <p>The following research documents were given particular consideration:</p> <ul style="list-style-type: none"> • Grierson study assessed the impact and effectiveness of the tax and benefit system in supporting the ability of Edinburgh’s low income parents to access childcare. The report concluded that there is a significant shortfall in lower cost childcare places to support the city’s known low income families and that this gap will remain a significant barrier in overcoming the problem of childhood poverty in Edinburgh. • The follow up report to this study, published in February 2006, proposed a partnership framework which could support the sustainability and development of all social childcare centres and improved financial recording within a “cost centre” framework to facilitate a strategic partnership with CEC. • Children in Scotland - costs of childcare in Scotland study, February 2011 highlighted the increasing costs of childcare in relation to average incomes. Overall average childcare costs for 25 hours a week are £84 in Scotland, which are more than half the gross average part time weekly earnings of £160. • Making Work Pay – report by Save the Children, September 2011, focused on the additional costs to be incurred by low income household parents as the rate of the Childcare Tax Credit within Working Tax Credit, was reduced from 80 to 70%. [referenced the Daycare Trust, costs of childcare survey]; adding case studies and evidence from parents confirming that a third of families living on less than £12,000 per year had gone into debt due to care costs. 	DR

<p>2. Local Parent Focus Groups</p> <p>To investigate the opinions and views of parents 6 local focus groups were held with parents who are currently use childcare as well as those who are not currently using any childcare.</p> <p>26 parents were consulted via this process (all female). The focus groups also covered specific areas including disability, vulnerable parents, and areas that do not currently have access to subsidised childcare to ensure a broad perspective was captured.</p>	FG
<p>3. Parent / Carer Survey</p> <p>The survey was undertaken over a four week period from early April 2013 to late May 2013 and used both paper and electronic questionnaires, with a target to complete 150.</p> <p>A poster advertising the survey, some postcards with links to the electronic survey and blog, together with a number of paper questionnaires were sent by post to 50 childcare providers across the city. A total of 236 surveys were completed.</p>	P/CS
<p>4. Visits to existing parent groups</p> <p>Though similar to the focus groups outlined above, the visits provided an opportunity to carry out the surveys in a group setting, enabling discussion around the questions asked, and the opportunity to collate qualitative information from the parents who attended. A total of 8 parent groups were visited, where a total of 58 parents were engaged with (all female).</p>	PG
<p>5. Business Intelligence Evidence</p> <p>To provide a baseline of evidence of current impact of the subsidy, we mapped the current provision availability in correlation to the areas affected by the highest levels of child poverty (based on the uptake of child tax credits to capture both on-work and out-of-work poverty).</p> <p>This evidence helped support the need for review, and proposed change to a means tested approach to enable more parents from more areas to access subsidised childcare.</p>	BI
<p>6. Open Consultation</p> <p>Once the data was gathered, 3 open consultation dates were held to get feedback on the options appraisal, with a total of 9 parents attending (all female). It provided the opportunity to feed real life situations through the different models proposed to assess their effectiveness, suitability, and appropriateness with regard to meeting the client need.</p>	OC
<p>7. External Stakeholder Interviews</p> <p>Staff from the Employability Hubs in the both the East and North of Edinburgh and a representative of the Scottish Childminder Association were consulted.</p>	EXI

(b) Rights Impact Assessment – Summary - Please describe all the identified enhancements and infringements of rights against the following ten areas of rights. Please also consider issues of poverty and health inequality within each area of rights:

Life	Health	Physical Security	Legal Security	Education and Learning	Standard of Living	Productive and Valued Activities	Individual, Family and Social Life	Identity, Expression and Respect	Participation, Influence and Voice
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Please indicate alongside each identified enhancement or infringement the relevant policy or service (see Section 1b) and relevant evidence (see Section 2a).

<p>Summary of Enhancements of Rights</p> <p>Education and Learning The review of subsidised childcare will enhance the ability and equity of opportunity to education and training for families in poverty through the provision of subsidised childcare.</p> <p>The provision of such will enable families to take up and sustain education / learning opportunities.</p> <p>Standard of Living / Individual, Family and Social Life The purpose of this review is to assist families towards economic wellbeing. The cost of childcare is evidenced as prohibitive to many low income households, acting as a barrier for parents who would otherwise engage with job focused activity, with the prospect of making the transition in to sustainable employment which, in turn, has a positive impact on the household in financial terms.</p> <p>In addition, links between long term unemployment and poor physical and / or mental health are well documented. The review of subsidised childcare seeks to ensure equity of access to subsidised childcare for eligible families to support them towards an improved standard of living.</p> <p>Productive and Valued Activities Through engaging with job focused activities, parents enhance the level of productive and valued activities in their lives.</p> <p>The review of subsidised childcare recognizes that childcare can be a barrier and seeks to address this.</p> <p>Participation, Influence and Voice Speaking to people who will benefit from services and offering the opportunity to voice their thoughts through focus groups; attending 1:1s; completing the research survey; attending consultation events.</p> <p>Summary of Infringement of Rights. Can these infringements be justified? Are they proportional? None</p>
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(c) Equality Impact Assessment – Summary - Please consider all the protected characteristics when answering questions 1, 2 and 3 below. Please also consider the issues of poverty and health inequality within each protected characteristic:

Age	Disability	Gender Identity	Marriage / Civil partnership	Pregnancy Maternity	Race	Religion/ Belief	Sex	Sexual Orientation
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1. Please describe all the positive and negative impacts on the duty to eliminate unlawful discrimination, harassment or victimisation. Please indicate alongside each identified impact the relevant policy or service (see Section 1b) and relevant evidence (see Section 2a).

Positive Impacts
No
Negative Impacts
No

2. Please describe all the positive and negative impacts on the duty to advance equality of opportunity (i.e. by removing or minimising disadvantage, meeting the needs of particular groups that are different from the needs of others and encouraging participation in public life)? Please indicate alongside each identified impact the relevant policy or service (see Section 1 b) and relevant evidence (see Section 2 a).

Positive Impacts
<p>In the context of the Economic Development Review of Subsidised Childcare, increasing the access of opportunity for all parents/carers who are in the lowest income households in the city and could benefit from childcare subsidy to support their economic well being, will improve the equality of opportunity for these households. In short, it will minimize their disadvantage to households with higher incomes.</p> <p>It is likely that given the proportion and number of female lone parents who have a low household income that this review will potentially have a greater impact on women, this is evident from the childcare survey: 135 respondents gave their personal details (out of a total of 235). Of these 135 respondents, 10 were male (7%).</p>
Negative Impacts
<p>It is likely that there will be stricter criteria applied to a families' eligibility for subsidised childcare, and that this could impact families currently accessing childcare at a subsidised rate. We would seek to minimise the impact on families affected in this way through a clearly communicated and negotiated transition plan.</p>

3. Please describe all the positive and negative impacts on the duty to foster good relations (i.e. by tackling prejudice and promoting understanding)? Please indicate alongside each identified impact the relevant policy or service (see Section 1 b) and relevant evidence (see Section 2 a).

Positive Impacts

We are actively seeking views of parents through a variety of community approaches and engagement activities as follows.

Questionnaires have been posted out to 51 organisations made up of childcare providers, community organizations, and council services including libraries and special schools. In addition, 200 postcards and 50 posters advertising how parents can contribute to the review have been circulated to encourage feedback from both parents who currently use childcare, and parents who do not.

The method of completion of the questionnaire has also been considered. 1:1 sessions with parents have been done via visits to local centres and community groups, and a postal questionnaire circulated. Finally, parents and carers were also able to complete the questionnaire online. A total of 240 (individual) parents have been consulted with via one or more of the means outlined.

Finally, as the review moved to consider options for how to manage Economic Development's future spend in this area, three public consultations took place in May at the following locations where a total of 9 people attended:

- An Options Consultation Session at Café Camino, York Place (parents across the city)
- An Options Consultation Session at Hays Business Centre (East Edinburgh)
- An Options Consultation Session at the National Museum of Scotland (working parents)

Negative Impacts

People referring to cuts, impacts etc

Within the survey responses, negative impacts of the Review of Subsidised Childcare were not expressed by any of those who responded. The same can be said with regard to the parent groups and focus groups where participants were focusing on childcare availability, flexibility, etc and not on the Review of Subsidised Childcare itself. However, some parents did consider that changes to the way in which the childcare subsidy is distributed, may result in them no longer being eligible for the subsidy. Whilst parents reflected that they would accept this, we did reflect that any changes must be implemented in a phased way to help support parents.

Part 3: Evidence Gaps, Recommendations, Justifications and Sign Off

(i) Evidence Gaps - Please list all relevant evidence gaps and action to address identified gaps.

Evidence Gaps	Action to address gaps
1. The Childcare Review working group felt that not enough feedback from single fathers has been received.	Consult with Lone Dads Group convened by One Parent Family Scotland and Gilmerton Child and Family Centre
2. Colleagues within Children and Families felt that we should consult with internal / CEC staff	Schedule Internal Stakeholder Consultation
3. The open consultations have had a poor turn out which does not provide us with sufficient representation	Develop a plan for ongoing consultations and updates for parents
4. The external stakeholder consultation does not have sufficient reach	Schedule external stakeholder consultation
5. Internal stakeholders and members of the childcare review felt that parents with a disability were not well represented within the consultation.	Consult with Childcare for All and other services delivering support for parents who have a child with additional support needs.
6. Our internal stakeholders felt that a transitional approach towards the implementation of any 'new' or changed service to ensure current service users are supported.	Ensure a transitional period is embedded in to any proposed changes
7. There was a general concern that if the Review paper is approved, Service Users should be informed, particularly of any future changes or alternations to the service they currently receive.	Plan a mail out and briefing note for current providers to share with their service users
8. To ensure that current families are supported through any changes and to implement any changes in a phased and supportive way.	Plan support for existing service users

(ii) Recommendations – Please record SMART recommendations to (i) eliminate unlawful practice or infringements of absolute rights, (ii) justify identified infringements of rights or (iii) mitigate identified negative equality impacts.

Recommendation	Responsibility of...	Timescale
1. Consult with Lone Dad's Group: Invitations to the 3 consultation sessions in May included an invite to the Lone Dad's Group. Contact was achieved with the group worker who works closely with the Dad's Group to encourage responses to the on-line survey.	Independent Consultant	June 2013

<p>2. Internal Stakeholder Event:</p> <p>In June, an event was held to consult with CEC employees on the review so far, key findings and visions for future service. Attendees were invited to input their ideas and suggestions in to the process. Their feedback was collated and circulated and helped form the paper for council.</p>	<p>Vivienne Robinson Judith Fenton</p>	<p>June 2013</p>
<p>3. Develop a plan for ongoing consultations and updates for parents :</p> <p>Reviewed the approach with Children and Families, Early Years Team in context of the development of the Joint Specification for future delivery of subsidised services and Affordable Childcare approach. Agreed to set up 4 Childcare Focus Groups to run in May 2014 to maintain ongoing consultation on views about childcare services.</p>	<p>Vivienne Robinson Judith Fenton</p>	<p>October 2013</p>
<p>4. Schedule External Stakeholder Event:</p> <p>Following recommendation, a further consultation exercise was carried out on 13/08/13 to consult with external stakeholders on the review so far, key findings and visions for future service. Attendees were invited to input their ideas and suggestions in to the process. Their feedback was collated and circulated and helped form the paper for council.</p>	<p>Vivienne Robinson</p>	<p>August 2013</p>
<p>5. Consult with Childcare for All and other services delivering support for parents who have a child with additional support needs.:</p> <p>Representatives from Childcare for All and Capability Scotland were invited to attend a Specification Scoping Workshop in January 2014; notes on this reflected the wide range of needs to be considered when planning future services.</p>	<p>Vivienne Robinson</p>	<p>November 2013</p>
<p>6. A transitional approach to a new service:</p> <p>This has been incorporated in to the process for the implementation to a 'new' or changed service to ensure current service users, providers and wider network are well supported. This will include advice on budgeting, benefits and income maximisation to ensure that a service user who is no longer eligible for the subsidy is able to plan</p>	<p>Vivienne Robinson Jane Ramage Lynette Robertson</p>	<p>November 2013</p>

ahead for the changes.		
7. Briefing note for Service Users: A briefing meeting was held with providers in November and follow up meetings in January and April 2014. As we proceed to procurement in June 2014, we will ensure that providers are fully briefed and in a position to update current and prospective service users.	Vivienne Robinson	December 2013
8. Support for existing service users: To ensure that current families are supported through any changes and to implement any changes in a phased and supportive way.	Vivienne Robinson Jane Ramage Amanda Godsell	December 2013

(iii) Sign Off - I, the undersigned, am content that: (i) the ERIA record represents a thorough and proportionate ERIA analysis based on a sound evidence base, (ii) the ERIA analysis gives no indication of unlawful practice or violation of absolute rights, (iii) the ERIA recommendations are proportionate and will be delivered, (iv) the results of the ERIA process have informed officer or member decision making, (v) that the record of ERIA has been published on the Council's website / intranet or (vi) that the ERIA record has been reviewed and re-published.

Date	Sign Off (print name and position)	Reason for Sign Off (please indicate which reason/s from list (i) to (vi) above)
11/11/2013	Ken Shaw, Service Manager, Employability and Skills	Reasons (i) to (iv)
	Laura McIntyre, Equalities Officer, Economic Development	Reasons (v) to (vi)