

Equality Impact Analysis

This equality impact analysis establishes the likely effects both positive and negative and potential unintended consequences that decisions, policies, projects and practices can have on people at risk of discrimination, harassment and victimisation. The analysis considers documentary evidence, data and information from stakeholder engagement/consultation to manage risk and to understand the actual or potential effect of activity, including both positive and adverse impacts, on those affected by the activity being considered.

To support completion of this analysis tool, please refer to the equality impact analysis guidance.

Section 1 – Analysis Details (Page 5 of the guidance document)

Name of Policy/Project/Decision	Engagement & consultation activities to help the development of a Sensory Strategy for adults
Lead Officer (SRO or Assistant Director/Director)	Caroline Malvern
Department/Team	Community Commissioning
Proposed Implementation Date	Start date: April 2024
Author of the EqlA	Caroline Malvern
Date of the EqlA	March 2024

1.1 What is the main purpose of the proposed policy/project/decision and intended outcomes?

The EIA looks at the effect of undertaking engagement and consultation activities with adults living with a sensory impairment. This is to increase the understanding, experiences and views of Bury residents that need access to Adult Social Care services and additional interventions. It covers people who are aged 18+.

The outcome of these activities will be the development of Bury's first Sensory Strategy (2024- 2027). The responses will also be at the heart of future commissioned intentions to enable adult residents living with visual impairment, Deafness or Deafblindness to be independent and to live well.

The Let's Do It Strategy, sets out the commitment that the voices of the residents of Bury are at the centre of our policies and decisions which affect them. This must include also listening and acting on the views of people with sensory impairment and creating spaces where they can share their experiences in an effective manner.

To create an effective Sensory Strategy, it is essential that the department successfully engages with people with sensory impairments and develops relationships of trust. Also, it is essential we make participation accessible and inclusive by ensuring communication methods and the environmental factors allow for effective contribution from people who have sensory loss.

This EIA is a live document and will be updated to look at the effect on people with protected characteristics of establishing Bury's first strategy for residents living with visual impairment, Deafness or Deafblindness to be independent and to live well. It will cover people who are aged 18+.

Section 2 – Impact Assessment (Pages 6 to 10 of the guidance document)

2.1 Who could the proposed policy/project/decision likely have an impact on?

Employees: This work will not impact on Bury Council staff with a protected characteristic(s)

Community/Residents: Bury residents with a sensory impairment aged 18+ who use services./unpaid carers/family members

Third parties such as suppliers, providers and voluntary organisations: Engagement/consultation work - no

If the answer to all three questions is 'no' there is no need to continue with this analysis.

2.2 Evidence to support the analysis. Include documentary evidence, data and stakeholder information/consultation

Documentary Evidence:

We receive over 90% of our information through our sight and hearing senses; sensory loss can have huge personal, social and economic impact through-out a person's life. However, visual and hearing impairment typically do not enjoy a high profile within society.

Bury Adult Social Care continue to make positive strides in the development of policy and service delivery in a continuing challenging budget environment. Nevertheless, there is much progress to be made in understanding, from residents' perspectives, the challenges faced during basic daily activities, social interaction and quality of life for an individual with a visual, hearing, or dual-sensory impairment.

Let's Do It!

The Let's Do It strategy makes a pledge to tackle inequalities with a clear pledge to drive inclusion.

Care Act 2014

The Care Act has elevated the importance of preventative services, and to make services more personalised. The prevention duty also recognises the clear benefits of rehabilitation support.

Department of Health & Social Care – Deafblind people: guidance for local authorities

This guidance is issued under section 78 of the Care Act 2014 in relation to adults and section 7 of the Local Authority Social Services Act 1970 in relation to children. Local authorities are required to act under the guidance in exercising their functions under Part 1 of the Care Act or under regulations under that Part, which means that they must follow it, unless they can demonstrate legally sound reasons for not doing so.

ADASS

The ADASS (Association of Directors of Adult Social Services) Position Statement on Vision Rehabilitation (May 2016) sets out the requirements in the context of personalisation, which aims to ensure that severely sight impaired and sight impaired people remain independent by putting them in control of decisions that affect their lives.

Equality Act 2010

The Equality Act requires all organisations that provide a service to the public to make reasonable adjustments to those services to ensure they are accessible to everyone.

Accessible Information Standard

The standard aims to make sure that people who have a disability, impairment or sensory loss are provided with information that they can easily read or understand and are provided with support so they can communicate effectively with health and social care services.

The UK Vision Strategy

This set out a strategic framework for improving the UK's eye health and outcomes for people with sight impairment.

Data:

Estimating the numbers of adults in Bury with sensory impairment is not easy because definitions which rest on a clinical diagnosis can provide underestimates and not all people who have sight and/or hearing loss will be known to / eligible for Adult Social Care support.

Older Adults (65 years and over):

Sight and hearing loss can affect us at any age, but age is a significant risk factor related to eye health and sight loss and most people experience some degree of hearing loss as they get older; about one-third of older adults have hearing loss.

Population projections detailed in the Bury JSNA, reveal older adults in Bury are expected to see the biggest increase of 15.4% with an additional 5,617 older adults between the years of 2023 to 2032. During the same time period, England is expected to see an even greater increase of 21.4% in older adults.

Despite the predicted increase in older adults' population lower than that predicted for England, this still represents a significant shift in the demographic composition of Bury.

People with visual impairments

The [RNIB](#) report in the UK, 2 million people are living with sight loss and every day 250 people start to lose their sight. An estimated 80% of people aged 65 and over are living with some degree of sight loss¹.

Locally, 74 people aged 18-64 years were estimated to be living with severe visual impairment; 3,269 aged 65 and over were predicted to have a visual impairment, with 1,158 people aged 75 over predicted to have registrable eye conditions.²

Certificate of Vision Impaired (CVI)

4.1 Section 77(1) of the Care Act 2014 requires local authorities to establish and maintain a register of adults who are ordinarily resident in their area who are sight-impaired or severely sight-impaired.

An eye specialist (Ophthalmologist) determines eligibility to be certified as sight impaired or severely sight impaired.

The Ophthalmologist will complete a Certificate of Vision Impaired (CVI) and forwards a copy (with consent) of the CVI to the Council.

Registration to the Sight Register is not compulsory and will not restrict access to support, however, it can help get a range of benefits to help with costs relating to disability.

The Bury SSDA902 Return to NHS Digital - Registers of people who are blind or partially sighted (2022 - 23):

Table 1	Blind/severely sight impaired persons and partial sight/sight impaired persons – Numbers on the register and new Registrations			
	Blind/severely sight impaired persons registered as at reporting period end.	New registrations of blind/severely sight impaired persons during the reporting period.	Partial sight/sight impaired persons registered as at reporting period end.	New registrations of partial sight/sight impaired persons during the reporting period.
Age 0 – 4	1	0	4	1
Age 5 – 17	26	1	28	1
Age 18 – 49	74	4	34	2

¹ RNIB Key Information & Statistics on sight loss in the UK

² POPPI & PANSI data tools

Age 50 – 64	49	4	45	3
Age 65 – 74	44	4	42	4
Age 75 and over	179	17	177	13
Total	373	30	330	24

Note: The number of adults with certificates of visual impairment on the register may be lower than the total number of certificates issued because some people choose not to register their certificate.

People with Hearing Impairments

In the UK, there are 12 million adults with a hearing loss, equivalent to one in five adults.

Locally, 37,207 adults were estimated to be living with a hearing loss in 2023. This includes 3,535 adults with severe hearing loss and 33,672 adults with some hearing loss.³

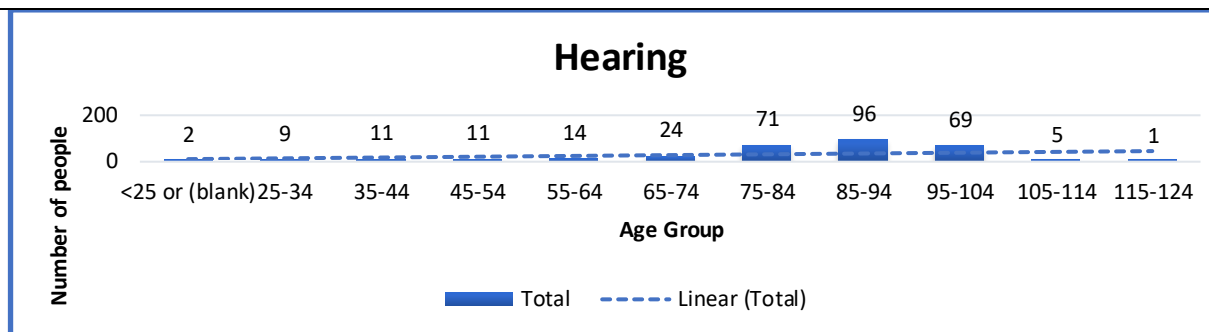
Hearing loss affects communication at work and home, employment opportunities, personal relationships, enjoyment of music and social independence. It can lead to reduction in people's quality of life.

People wait an average of 10-years before seeking treatment for hearing loss and when people do eventually seek help, GPs fail to refer 45% of people on.⁴

The 2020/21 Adult Social Care database (PROTOCOL) records for the number of adults recorded with hearing impairments:

³ POPPI & PANSI data tools

⁴ Action on Hearing Loss - Joining up – Long term conditions report

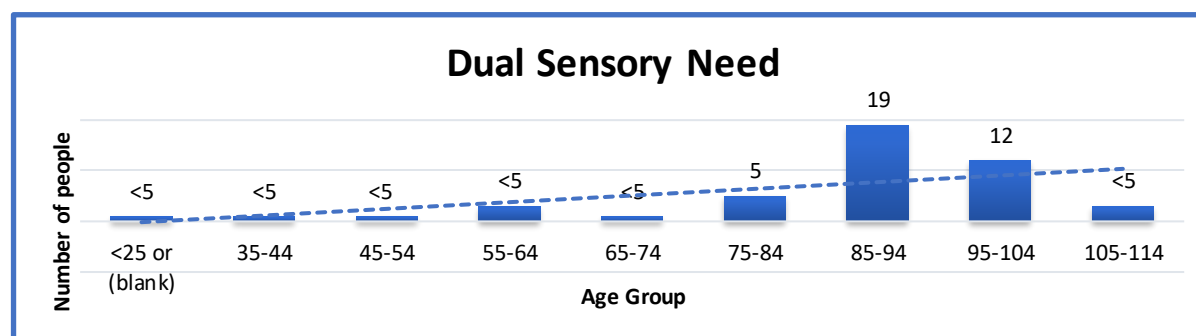


People with deafblindness

Deafblindness, also known as dual sensory loss or multi-sensory impairment, is a combination of both sight and hearing loss that affects your everyday life. Dual sensory loss is a completely unique condition and affects everyone in different ways. It can range from struggling to see and hear the TV to not being able to see or hear anything at all.

Being deafblind does not necessarily mean you are totally deaf and/or totally blind. Many people who are deafblind have some sight and some hearing.

The 2020/21 Adult Social Care database (PROTOCOL) records for the number of adults recorded with dual sensory need:



Stakeholder information/consultation:

To deliver constructive and engaging sessions it is important to ensure equal access to information to encourage communication.

Examples of accessible resources include, qualified Interpreters (such as British Sign Language Interpreters), hearing loops, providing materials relating to the workshops in advance and being able to offer materials in a format for easy read communications.

In every instance where written communication is required with a person with sensory loss, the individual should be asked to indicate the appropriate format for them, and this should be provided.

It is proposed that the engagements are face-to-face and will take place in the premises of two local charities where the environment is inclusive and where people are and use:

- **The Bury Hearing Hub** -The Bury Hearing Hub is a charitable foundation supporting people with hearing loss in Bury.
- **Bury Society for Blind and Partially Sighted People (BBS)** - BBS undertake a range of early intervention and rehabilitation services, available to any resident living in Bury with a non-corrective eye condition.

To enable as much participation as possible, the Commissioning division will work with both charities to explore how self-administered surveys can also be used as a method to engage.

BBS asked clients their opinions on how the engagement sessions should be held. Feedback from them included:

- It would be easier for people to access the sessions at BBS.
- To have at least two sessions- one during the day and another in the evening.
- To provide food for the evening session to accommodate people who may be attending after work.

Following the initial engagement with adults living with a sensory impairment, their family and carers, professionals and our local partners will also have opportunity to engage to understand local needs.

2.3 Consider the following questions in terms of who the policy/project/decision could potentially have an impact on. Detail these in the impact assessment table (2.4) and the potential impact this could have.

- Could the proposal prevent the promotion of equality of opportunity or good relations between different equality groups?
- Could the proposal create barriers to accessing a service or obtaining employment because of a protected characteristic?
- Could the proposal affect the usage or experience of a service because of a protected characteristic?
- Could a protected characteristic be disproportionately advantaged or disadvantaged by the proposal?
- Could the proposal make it more or less likely that a protected characteristic will be at risk of harassment or victimisation?
- Could the proposal affect public attitudes towards a protected characteristic (e.g. by increasing or reducing their presence in the community)?
- Could the proposal prevent or limit a protected characteristic contributing to the democratic running of the council?

2.4 Characteristic	Potential Impacts	Evidence (from 2.2) to demonstrate this impact	Mitigations to reduce negative impact	Impact level with mitigations Positive, Neutral, Negative
Age	Positive	The working age population in Bury is expected to remain stable to 2033 with a projected to increase by 1.2% Age is a significant risk factor related to sight and hearing loss and older adults in Bury are expected to see the biggest increase of 15.4% with an additional 5,617 older adults. This work proposes to represent issues, along with aspirations of adults of all ages.	This work is to ensure the voice of people with a sensory impairment shape the first ever Sensory Strategy aimed at improving outcomes for adults of all ages. Any emerging equality impacts identified undertaking this work will be identified and managed through the lifetime of the proposed strategy.	
Disability	Positive	People with disabilities will be impacted in a positive		

		way as the work will drive the need for action and improvement. The approach to the engagement / consultation work detailed above, has been directed by two local charities, Bury Blind Society and the Bury Hearing Hub where the environment is inclusive. Individual communication needs and preferences will be sought.		
Gender Reassignment	Neutral	No evidence to suggest impact.		
Marriage and Civil Partnership	Neutral	No evidence to suggest impact.		
Pregnancy and Maternity	Neutral	No evidence to suggest impact.		
Race	Neutral	No evidence to suggest impact.		
Religion and Belief	Neutral	No evidence to suggest impact.		
Sex	Neutral	No evidence to suggest impact.		
Sexual Orientation	Neutral	No evidence to suggest impact.		
Carers	Positive	The engagement /consultation will be open to unpaid carers to ensure		

		their views are reflected. This work will also allow opportunity to promote the Bury Carers Hub – a commissioned service for unpaid carers.		
Looked After Children and Care Leavers	Neutral	No evidence to suggest impact.		
Socio-economically vulnerable	Neutral	The premises hosting the face-2-face sessions are where people go and within reach of local public transport networks. Refreshments will be provided free of charge. Pre-paid envelopes will be provided for responses. Interpreters (if required) will be provided.		
Veterans	Neutral	No evidence to suggest impact.		

Actions required to mitigate/reduce/eliminate negative impacts or to complete the analysis

2.5 Characteristics	Action	Action Owner	Completion Date
	No actions identified at this stage.		

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Section 3 - Impact Risk

Establish the level of risk to people and organisations arising from identified impacts, with additional actions completed to mitigate/reduce/eliminate negative impacts.

3.1 Identifying risk level (Pages 10 - 12 of the guidance document)

Impact x Likelihood = Score			Likelihood			
			1	2	3	4
			Unlikely	Possible	Likely	Very likely
Impact	4	Very High	4	8	12	16
	3	High	3	6	9	12
	2	Medium	2	4	6	8
	1	Low	1	2	3	4
	0	Positive / No impact	0	0	0	0

Risk Level	No Risk = 0	Low Risk = 1 - 4	Medium Risk = 5 – 7	High Risk = 8 - 16
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3.2 Level of risk identified	Low Risk
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3.3 Reasons for risk level calculation	<p>The reasons for the low risk level calculation for the engagement / consultation work.</p> <ul style="list-style-type: none"> • Guidance has been sought from two local charities on the environment accessibility. • The charities venues will be used to undertake face-2-face sessions. – both premises are centrally located in Bury Town Centre and convenient for local transport. • The Bury Hearing Hub -The Bury Hearing Hub is a charitable foundation supporting people with hearing loss in Bury. • Bury Society for Blind and Partially Sighted People (BBS) - BBS undertake a range of early intervention and rehabilitation services, available to any resident living in Bury with a non-corrective eye condition. • Bury Blind Society has asked people their thoughts on how the engagement sessions should run. • Various forms of communication will be used - qualified Interpreters (such as British Sign Language Interpreters), hearing loops, offering materials in a format for easy read communications, use of online surveys. • A communication plan will be developed to identify partners who can help raise the profile of this work.
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Section 4 - Analysis Decision (Page 11 of the guidance document)

4.1 Analysis Decision	X	Reasons for This Decision
There is no negative impact therefore the activity will proceed		
There are low impacts or risks identified which can be mitigated or managed to reduce the risks and activity will proceed	X	Not all people who have sight and/or hearing loss will be known to / eligible for Adult Social Care support. Or be connected with Bury Blind Society / the Bury Hearing Hub. A communication plan will be developed for improving comms, avoiding confusion and to identify appropriate stakeholders.
There are medium to high risks identified which cannot be mitigated following careful and thorough consideration. The activity will proceed with caution and this risk recorded on the risk register, ensuring continual review		

Section 5 – Sign Off and Revisions (Page 11 of the guidance document)

5.1 Sign Off	Name	Date	Comments
Lead Officer/SRO/Project Manager	Caroline Malvern	March 24	
Responsible Asst. Director/Director			
EDI	Lee Cawley	03/04/2024	

EqlA Revision Log

5.2 Revision Date	Revision By	Revision Details