

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	Supported Living Tender
Lead Officer (SRO or Assistant Director/Director)	Adrian Crook (Director of Adult Social Services and Community Commissioning)
Department/Team	Health and Care
Proposed Implementation Date	N/A
Author of the EqlA	Claire Travis (Commissioning Manager for Learning Disabilities & Autism)
Date of the EqlA	20 th August 2025

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

Summary

“Transforming Learning Disability Services” is one of our Adult Social Care priorities 2023-2026: supporting people with learning disabilities to help them live as independently as possible, connected to their communities, and having fulfilled lives.

At the heart of this transformation is our “Together Towards Independence” programme. One element of this is where social workers supported people with challenging behaviours to achieve their goals by using a strengths-based, progressive approach.

An essential part of our journey is also working alongside our care partners to make sure that everyone is using a strengths-based progressive approach. Whilst we have great care partners in Bury, we need to make sure that every single one is supporting our residents to live their best lives and achieve their goals. Not just to maintain a “status quo” meeting people’s needs, but to support to develop skills and enable them to progress, where possible. We cannot achieve our goals unless we support our care partners to be the best that they can be.

Permission is sought to start the process which will ultimately result in the procurement of a new Supported Living contract in Bury, to replace the existing contracts. Following procurement rules, we will work with existing and new care partners to work on the development of a new service specification, which will ensure that everyone is working in the progressive and strengths-based way.

The Supported Living service supports the vulnerable people of Bury with their assessed needs under the Care Act 2014. This includes support with development of independent living skills. The definition of Supported Living for the purposes of this tender exercise is anyone who receives support from a CQC registered provider in their own home and/or the community which is not “traditional” care at home.

The service supports approximately 177 people and delivers care in 65 supported living locations each week (locations could be single occupancy dwellings or buildings where several people live).

The forecast for FY2025/26 is that the council will spend approximately £13.7m on Supported Living for people with learning disabilities whose support is commissioned from 21 private care partners in Bury.

Recommendation(s)

1. The Commissioning Team will follow the timeline outlined and complete consultation, engagement, and co-production of a service specification.
2. For the tender for Supported Living to be put to the market, as per procurement rules and support.
3. For Cabinet to receive the results of the invitation to tender and award the contract between July-November 2026.

Reasons for recommendation(s)

The re- procurement and timeline will afford Commissioners the opportunity to complete comprehensive engagement with key stakeholders on a new model for Supported Living. We will run workshops with partners and professionals to understand what works well currently and whether there are opportunities to do things differently, and we will engage with residents and families, not only people who use the service, but also the Bury People First (our co-production network). Commissioners will co-produce a new service specification and model with key stakeholders.

In line with its legal duties, the Council will follow Procurement Law and fair purchasing processes.

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: No. The recommendations relate to potential changes for Supported Living providers and customers.

Community/Residents: Yes.

Third parties such as suppliers, providers, and voluntary organisations: Yes.

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

Advice from Corporate Procurement and Legal colleagues is that the Council is complying with relevant rules and legislation.

Data from Equality Impact Assessment for Supported Living Service Review completed in July 2025:

Protected Characteristic	Bury Population Data (from the JSNA*)	Supported Living Customer Data –learning disabilities (from Liquid Logic)
Age	<p>Bury has 114,526 (59.1%) working age adults (18-64 years).</p> <p>There are 35,447 (18.3%) older adults in Bury (65 years and over).</p>	<p>Age 18 to 64 – estimated to be 105 people</p> <p>Age 65 and over – estimated to be 13 people</p>
Disability	19% of the population report having a disability.	Data unavailable. However, everybody receiving this service has Care Act eligible needs.
Gender Reassignment	The question on gender identity was new for Census 2021. It was a voluntary question only asked of those aged 16 years and over. The question asked, “Is the gender you identify with the same as your sex registered at birth?” with 3 answer options of Yes, No or to write in their gender identity. 94.4% of the population aged 16 years and over in Bury answered Yes.	Data unavailable.
Race	<p>Asian, Asian British or Asian Welsh – 11.9%</p> <p>Black, Black British, Black Welsh, Caribbean or African – 1.9%</p> <p>Mixed or Multiple ethnic groups – 2.6%</p>	<p>Asian, Asian British or Asian Welsh – estimated to be 21 people</p> <p>Black, Black British, Black Welsh, Caribbean or African – estimated to be 3 people</p> <p>Mixed or Multiple ethnic groups – estimated to be 5 people</p>

	Other ethnic group – 1.9% White: English, Welsh, Scottish, Northern Irish or British – 78.2% White: Other – 3.5%	Other ethnic group – estimated to be 3 people White: English, Welsh, Scottish, Northern Irish or British – estimated to be 138 people White: Other – estimated to be 6 people
Religion and Belief	Buddhist - 0.3% Christian – 48.8% Hindu – 0.5% Jewish – 5.5% Muslim – 9.9% Sikh – 0.3% Other religion – 0.3% No religion – 29.4% Not answered – 4.9%	Buddhist – 1 person Christian – 86 people Hindu – 1 person Jewish – 10 people Muslim – 18 people Sikh – 1 person Other religion – 1 person No religion – 52 people Not answered – 8 people
Sex	The population of Bury is 51% female and 49% male.	Data not available from systems, however assumption is that the ratio will follow the general population split.
Sexual Orientation	The question on sexual orientation was new for Census 2021 and was voluntary only asked of those aged 16 years and over: Heterosexual/Straight – 90.6% Gay/Lesbian – 1.6% Bisexual – 1% All other sexual orientations – 0.3% Not answered – 6.5%	Not recorded on Protocol LAS.
Carers	The percentage of people providing unpaid care in Bury is 9.2%.	Informal Carer (without an active carers support plan) – 331 (40.4%) Formal Carer (with an active carers support plan) – 119 (14.5%)

(*) Please note: the JSNA analyses characteristics of the population, as above, but does not break this down further for people with Learning Disabilities.

All key stakeholders, with the exception of providers due to market competition rules, will be invited to join a 'co-production working group' which will meet regularly throughout October 2025 to March 2026 to update and co-produce the relevant documentation. The Community Commissioning Team will lead this work with input from Brokerage colleagues, Healthwatch colleagues, and Bury People First (our Learning Disability co-production network).

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	All customers will still receive the same level of support, but for	As described in the data section above, a disproportionate cohort of people with learning	Clear comms with all customers affected via a letter including e-mail address and phone number for any queries. This will be checked by the	Neutral.

	<p>some it may be delivered by a different provider which will involve a transition (all customers will have a choice).</p> <p>Impact with older customers that a change/transition in care team may cause anxiety, confusion, and uncertainty.</p>	<p>disabilities are more likely to use Supported Living services.</p>	<p>Council's Comms Team to ensure it is accessible. Providers will be asked to offer support to customers who need it.</p> <p>Commissioners will support a smooth transfer by ensuring consent by the customer and all relevant paperwork in place for the new provider, particularly the support plan as this will include specific individual requirements, such as reasonable adjustments to support a protected characteristic.</p> <p>Customers will also have the option for a personal budget to choose their provider or a personal assistant of choice, for example, if they have built up a relationship of trust with their provider.</p>	
Disability	<p>All customers will still receive the same level of support, but for some it may be delivered by a different provider which will involve a transition (all</p>	<p>Disproportionate cohort of people with disabilities are more likely to use Supported Living services.</p>	<p>Clear comms with all customers affected via a letter including e-mail address and phone number for any queries. This will be checked by the Council's Comms Team to ensure it is accessible. Providers will be asked to offer support to customers who need it.</p>	<p>Neutral.</p>

	<p>customers will have a choice).</p> <p>Potential impact in lost knowledge of the cared for person and reasonable adjustments in place during a transition to a new care team.</p> <p>Changes in care team may cause some disabled customers anxiety, confusion, and uncertainty.</p>		<p>Commissioners will support a smooth transfer by ensuring consent by the customer and all relevant paperwork in place for the new provider, particularly the support plan as this will include specific individual requirements, such as reasonable adjustments to support a protected characteristic.</p> <p>Customers will also have the option for a personal budget to choose their provider or a personal assistant of choice, for example, if they have built up a relationship of trust with their provider. Currently 25% of people with LD who have a package of care, have a personal budget direct payment which they use to purchase all or some of their support.</p>	
Gender Reassignment	<p>All customers will still receive the same level of support, but for some it may be delivered by a different provider which will involve a transition (all</p>	Data unavailable.	<p>Clear comms with all customers affected via a letter including e-mail address and phone number for any queries. This will be checked by the Council's Comms Team to ensure it is accessible. Providers will be asked to offer support to customers who need it.</p>	Neutral.

	<p>customers will have a choice).</p> <p>Transgender customers may have built up a relationship of trust with current care team. There may be some anxiety and uncertainty in protecting trans history and/or disclosing trans history to new care provider teams.</p>		<p>Commissioners will support a smooth transfer by ensuring consent by the customer and all relevant paperwork in place for the new provider, particularly the support plan as this will include specific individual requirements, such as reasonable adjustments to support a protected characteristic.</p> <p>Commissioners will work with customers and take a customer led approach to those who have a trans history to manage any transition (this would include or exclude trans history information depending on the persons choice).</p> <p>Customers will also have the option for a personal budget to choose their provider or a personal assistant of choice, for example, a transgender person may have built up a relationship of trust with their carers and may wish to keep their current provider.</p>	
Marriage and Civil Partnership	No evidence to suggest impact.	N/A	N/A	Neutral.
Pregnancy and Maternity	No evidence to suggest impact.	N/A	N/A	Neutral.

<p>Race</p>	<p>All customers will still receive the same level of support, but for some it may be delivered by a different provider which will involve a transition (all customers will have a choice).</p> <p>Potential Impact around language barriers during transition to new care team provider.</p> <p>Impact in maintaining any cultural arrangements that may be in place with current care team.</p>	<p>Whilst there are some variations between Bury population data and Supported Living Customer data there is nothing to suggest a significant disproportionate impact.</p>	<p>Clear comms with all customers affected via a letter including e-mail address and phone number for any queries. This will be checked by the Council's Comms Team to ensure it is accessible. Providers will be asked to offer support to customers who need it.</p> <p>Commissioners will support a smooth transfer by ensuring consent by the customer and all relevant paperwork in place for the new provider, particularly the support plan as this will include specific individual requirements, to support a protected characteristic (for example, female only carers for cultural reasons).</p> <p>Where required a translation service is accessible to both commissioners and customers to assist in the communication of any transition in care team.</p> <p>Customers will also have the option for a personal budget to choose their provider or a personal assistant of choice, for example, if they have the same language or</p>	<p>Neutral.</p>
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			cultural needs as their carers, they may wish to keep their current provider.	
Religion and Belief	<p>All customers will still receive the same level of support, but for some it may be delivered by a different provider which will involve a transition (all customers will have a choice).</p> <p>Impact in maintaining any cultural and religious arrangements that may be in place with current care team.</p>	<p>Whilst there are some variations between Bury population data and Supported Living Customer data there is nothing to suggest a significant disproportionate impact.</p>	<p>Clear comms with all customers affected via a letter including e-mail address and phone number for any queries. This will be checked by the Council's Comms Team to ensure it is accessible. Providers will be asked to offer support to customers who need it.</p> <p>Commissioners will support a smooth transfer by ensuring consent by the customer and all relevant paperwork in place for the new provider, particularly the support plan as this will include specific individual requirements, such as reasonable adjustments to support a protected characteristic (for example, female only carers for religious reasons or protected times of day/week for worship/praying).</p> <p>Customers will also have the option for a personal budget to choose their provider or a personal assistant of choice, for example, if they have built up a relationship of trust with their provider.</p>	Neutral.

Sex	<p>All customers will still receive the same level of support, but for some it may be delivered by a different provider which will involve a transition (all customers will have a choice).</p> <p>Potential impact in maintaining gender appropriate care when changing care teams.</p>	<p>Whilst there is a variation between Bury population data and Supported Living Customer data there is nothing to suggest a significant disproportionate impact.</p>	<p>Clear comms with all customers affected via a letter including e-mail address and phone number for any queries. This will be checked by the Council's Comms Team to ensure it is accessible. Providers will be asked to offer support to customers who need it.</p> <p>Commissioners will support a smooth transfer by ensuring consent by the customer and all relevant paperwork in place for the new provider, particularly the support plan as this will include specific individual requirements, such as reasonable adjustments to support a protected characteristic (for example gender appropriate carers where possible).</p> <p>Customers will also have the option for a personal budget to choose their provider or a personal assistant of choice, for example, if they have built up a relationship of trust with their provider.</p>	Neutral.
Sexual Orientation	<p>All customers will still receive the same level of support, but for</p>	<p>Whilst there are some variations between Bury population data and Supported Living</p>	<p>Clear comms with all customers affected via a letter including e-mail address and phone number for any queries. This will be checked by the</p>	Neutral.

	<p>some it may be delivered by a different provider which will involve a transition (all customers will have a choice).</p> <p>Customers may have built a relationship of trust with their care team around sexual orientation. A change in care team may cause some anxiety or uncertainty around 'coming out' and building trust with a new team.</p>	<p>Customer data there is nothing to suggest a significant disproportionate impact.</p>	<p>Council's Comms Team to ensure it is accessible. Providers will be asked to offer support to customers who need it.</p> <p>Commissioners will support a smooth transfer by ensuring consent by the customer and all relevant paperwork in place for the new provider, particularly the support plan as this will include specific individual requirements, such as reasonable adjustments to support a protected characteristic.</p> <p>Commissioners will work with customers and take a customer led approach to manage disclosure or non-disclosure of sexual orientation depending on the persons choice.</p> <p>Customers will also have the option for a personal budget to choose their provider or a personal assistant of choice, for example, if they have built up a relationship of trust with their carers, particularly around sexual orientation, they may wish to keep their current provider.</p>	
Carers	All customers will still receive	Disproportionate impact is expected due to the cohort	Clear comms with all customers/carers affected via a	Neutral.

	the same level of support, but for some it may be delivered by a different provider which will involve a transition (all customers will have a choice).	of people who use Supported Living services.	<p>letter including e-mail address and phone number for any queries. This will be checked by the Council's Comms Team to ensure it is accessible. Providers will be asked to offer support to customers who need it.</p> <p>Commissioners will support a smooth transfer by ensuring consent by the customer and all relevant paperwork in place for the new provider, particularly the support plan as this will include specific individual requirements, such as reasonable adjustments to support a protected characteristic. Customers will also have the option for a personal budget to choose their provider or a personal assistant of choice, for example, if they have built up a relationship of trust with their provider.</p>	
Looked After Children and Care Leavers	No evidence to suggest impact.	N/A	N/A	Neutral.
Socio-economically vulnerable	No evidence to suggest impact.	N/A	N/A	Neutral.
Veterans	No evidence to suggest impact.	N/A	N/A	Neutral.

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.		

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>A low risk level has been calculated for the following recommendations:</p> <ol style="list-style-type: none"> 1. The Commissioning Team will follow the timeline outlined and complete consultation, engagement, and co-production of a service specification. 2. For the tender for Supported Living to be put to the market, as per procurement rules and support. 3. For Cabinet to receive the results of the invitation to tender and award the contract between July-November 2026. <p>The reasons for the low risk level are:</p> <ul style="list-style-type: none"> • Advice from legal services confirms that the Council is complying with Procurement rules and legislation. • All customers will still receive the same level of support, but for some it may be delivered by a different provider which will involve a transition (all customers will have a choice). • Clear comms with all customers/carers affected via a letter including e-mail address and phone number for any queries. This will be checked by the Council's Comms Team to ensure it is accessible. Providers will be asked to offer support to customers who need it. • Commissioners will support a smooth transfer by ensuring consent by the customer and all relevant paperwork in place for the new provider, particularly the support plan as this will include specific individual requirements, such as reasonable adjustments to support a protected characteristic. Customers will also have the option for a personal budget to choose their provider or a personal assistant of choice, for example, if they have built up a relationship of trust with their provider.
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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	Bury Council must follow procurement rules and legislation. All customers will still receive the same level of support, but for some it may be delivered by a

		different provider. All customers will have a choice and reasonable adjustments will be made to support protected characteristics, managed in a sensitive manner.
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			
Responsible Asst. Director/Director			
EDI	Lee Cawley	20/08/25	QA Complete. The analysis has identified several impacts across many characteristics which may occur as a result of this activity. All impacts which could be negative or present disadvantage have been mitigated to ensure these are minimised or eliminated.

EqIA Revision Log

5.2 Revision Date	Revision By	Revision Details
20 08 25	Claire Travis	Extra detail supplied, as per request from Lee Cawley

