

# EQUALITY IMPACT ASSESSMENT

## 1. Topic of assessment

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| <b>EIA title:</b> | Re-tender of Surrey's <b>Integrated Offender Interventions Service (IOIS)</b> |
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| <b>EIA author:</b> | Heather Ryder, Senior Public Health Lead, Public Health |
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## 2. Approval

|                                | <b>Name</b>  | <b>Date approved</b> |
|--------------------------------|--|----------------------|
| <b>Approved by<sup>1</sup></b> | Helen Atkinson<br>Director of Public Health<br><br> | 07.08.2014           |

## 3. Quality control

|                       |               |                      |               |
|-----------------------|---------------|----------------------|---------------|
| <b>Version number</b> | 2             | <b>EIA completed</b> | 4 August 2014 |
| <b>Date saved</b>     | 4 August 2014 | <b>EIA published</b> |               |

## 4. EIA team

| <b>Name</b>   | <b>Job title (if applicable)</b> | <b>Organisation</b> | <b>Role</b>         |
|---------------|----------------------------------|---------------------|---------------------|
| Heather Ryder | Senior Public Health Lead        | Public Health, SCC  | Project sponsor     |
| Lisa Slade    | Category Specialist              | Procurement, SCC    | Procurement Advisor |

<sup>1</sup> Refer to earlier guidance for details on getting approval for your EIA.

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## 5. Explaining the matter being assessed

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| <p><b>What policy, function or service is being introduced or reviewed?</b></p> | <p>The Coalition drug strategy sets out a “fundamentally different approach to tackling drugs and an entirely new ambition to reduce drug use and dependence. It sets out that services must be more integrated. Power and accountability must sit at the lowest possible level. There is a shift of responsibility for recovery on to the individual to be accountable for their actions and work with those who are there to support them to tackle and overcome their dependence, drawing on the support from those who have already overcome their own drug and alcohol dependence.</p> <p>The provision of an Integrated Offender Interventions Service is being re-tendered. There are currently 2 services commissioned by SCC providing the elements contained within the proposed new IOIS contract. The re-tendering of the service allows the service delivery to be aligned and commissioned as one, thereby reducing overheads and adopting a seamless approach across services.</p> <p>The key outcomes for the service are to:</p> <ul style="list-style-type: none"> <li>• prevent problematic substance misuse</li> <li>• reduce drug and alcohol related crime</li> <li>• enable and support the long-term recovery, rehabilitation and social reintegration of people in Surrey affected by substance misuse.</li> </ul> <p>This new service will include the delivery of statutory drug and alcohol community sentences as imposed by courts. These include Drug Rehabilitation Requirements (DRR), Alcohol Treatment Requirements (ATR) and Alcohol Specific Activity Requirements (ASAR).</p> |
| <p><b>What proposals are you assessing?</b></p>                                 | <p>The retendered service will work in partnership with the commissioners to :</p> <ul style="list-style-type: none"> <li>• Reduce the harm that illicit drug and alcohol use causes to the individual, their family and the community at large.</li> </ul> <p>In order to achieve the above the service will be require to deliver the following outcomes :</p> <ul style="list-style-type: none"> <li>• Freedom from dependence on drugs and alcohol</li> <li>• Reduction in substance misuse related offending</li> <li>• Improved mental and physical health and wellbeing, including social functioning and personal relationships</li> <li>• Reduction in substance misuse within the community</li> <li>• Reduction of substance related harm to service users/ offenders, public and others</li> <li>• Reduction of substance misuse related deaths</li> </ul>  |

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|   | <ul style="list-style-type: none"> <li>• Reduction in blood borne viruses</li> <li>• Improved relationships with family members, partners and friends, including the ability to be an effective parent</li> </ul> <p>The Key Outcome Performance Indicators (KPIs) for the Integrated Offender Interventions Service are determined by Public Health England (PHE). The delivery of these targets will be assessed on a quarterly basis. In addition, the Service Provider will comply with the PHE outcome monitoring tool (TOPS – treatment outcome profiles) and take into account new proposals outlined within the Offender Rehabilitation Act 2014. A robust Substance Misuse Service Performance Outcome Framework based on this structure and targets will be agreed once the contract is awarded.</p> <p>As part of this we will be engaging with service users to understand their experience of substance misuse services which will inform ongoing commissioning.</p> <p>The commissioning of the new service will involve the Public Health Team (Surrey County Council) with input from the Police and Crime Commissioners Office, Surrey Police and local Community Safety Partnerships.</p> |
| <b>Who is affected by the proposals outlined above?</b> | <p>Service users accessing this service will be adult (aged 18+) and resident in Surrey (or registered with a GP in Surrey). They will be experiencing problematic substance misuse issues, including the use of opiates, stimulants, hallucinogens and alcohol, and have an involvement in the criminal justice system. Key referral agencies will be the police, probation service, prisons and courts.</p> <p>Changes in the provision of a the new service may impact on the following:</p> <ul style="list-style-type: none"> <li>• Existing service users;</li> <li>• External organisations that refer into the organisation.</li> </ul>   |

## 6. Sources of information

### Engagement carried out

The updated service specification has been informed by the following processes :

- quarterly performance reviews undertaken by Public Health with the current providers;
- informal engagement with service users;
- formal engagement – a Concept Day – with key stakeholders and potential service providers;
- review of best practice working with statistical neighbours and through liaison with PHE regional representative;
- analysis of data from JSNA;
- the proposal has been agreed with colleagues within the commissioning team from Public Health, members from the Public Health Substance Misuse Partnership and co-ordinated by SCC procurement.

### Data used

The following data sets were used :

- Drug Outcome Monitoring reports (PHE);
- Treatment Outcome Profiles (PHE);
- Contract performance management framework for each of the current contracts;
- Service user feedback;
- Service user consultation;
- PHE commissioning guidance (JSNA support pack for commissioners);
- Drug Treatment Monitoring Unit Adult profiles;
- Surrey JSNA.

## 7. Impact of the new/amended policy, service or function

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## 7a. Impact of the proposals on residents and service users with protected characteristics

| Protected characteristic <sup>2</sup>   | Potential positive impacts  | Potential negative impacts   | Evidence   |
|---|---|--|--|
| <p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 295</p> <p><b>Age</b></p> | <p>The age range most represented in treatment was 35 to 44 (1364 – 33%) followed by 25 to 34 (1121 – 27%) and 45 to 54 (972 – 23%). Again this is a similar picture compared to the previous year.</p> <p>The IOIS will respond positively to the needs of all groups who have a protected characteristic within the Equality Act 2010. These characteristics include race, religion or belief, sexual orientation, pregnancy and maternity, age, disability, gender and gender identity. The Service Provider is expected to engage with these groups through all necessary means to ensure inclusion is in a positive and meaningful way.</p> <p>In addition the benefit of the new service on users is that it will rationalise previously fragmented provisions into</p> | <p>No evidence of changes to services to disproportionately affect this group.</p> | <p>All persons, irrespective of race, gender, disability, age, ethnicity, religion or sexual orientation should be able to secure access to the same substance misuse treatment services as the rest of the population.</p> <p>In delivering the IOIS, the Service Provider will be “exercising public functions” for the purposes of section 149(2) of the Equality Act 2010. As such, the Service Provider is required to pay due regard to the Public Sector Equality Duty under section 149(1) of that Act and to deliver the Services accordingly. The Equality Act 2010 relates to service users and employees. The Service Provider has responsibilities’ as a provider to service users and as an employer to its employees.</p> <p>In the delivery of any services commissioned on behalf of the Surrey County Council, the Service Provider must demonstrate awareness and be responsive to the accessibility and needs of groups described above either in services or attempting to access services.</p> |

<sup>2</sup> More information on the definitions of these groups can be found [here](#).

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|                            | one service thus making it more efficient to respond to multiple needs. |   |  |
| <b>Disability</b>          | As above.   | No evidence of changes to services to disproportionately affect this group.   | <p>As above.</p> <p>Accessibility relates to (but is not limited to); physical and mental impairment, communication needs, those with either a hearing or sight impairment, translation / interpretation if English is not a first language, the expectation with regards to acceptance of individuals defined under gender identification, respect of faith and beliefs.</p>  |
| <b>Gender reassignment</b> | As above.   | <p>No evidence of changes to services to disproportionately affect this group.</p> <p>It is, however, expected of the new service to promote itself and deliver interventions in a way which enables transgender service users to be more confident in accessing the service.</p> | <p>All persons, irrespective of race, gender, disability, age, ethnicity, religion or sexual orientation should be able to secure access to the same substance misuse treatment services as the rest of the population.</p> <p>In delivering the IOIS, the Service Provider will be “exercising public functions” for the purposes of section 149(2) of the Equality Act 2010. As such, the Service Provider is required to pay due regard to the Public Sector Equality Duty under section 149(1) of that Act and to deliver the Services accordingly. The Equality Act 2010 relates to service users and employees. The Service Provider has responsibilities’ as a provider to service users and as an employer to its employees.</p> <p>In the delivery of any services commissioned on behalf of the Surrey County Council, the Service Provider must demonstrate awareness and be responsive to the accessibility and needs of groups described above either in services or attempting to access services.</p> |

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|   |  |  | <p>Several studies show that drug prevention and treatment services need to be more accurately attuned to the needs of the LGBT population. For this to happen, more evidence is required so that the appropriate service provision can be commissioned. Specifically, qualitative data on recreational drug use (e.g. use not solely relating to ‘addiction’), on the different drugs used by LGBT groups, and evidence relating to inhibiting factors for those who do not access services are required in order to better understand service needs</p>  |
| <p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 297</p> <p style="text-align: center;"><b>Pregnancy and maternity</b></p> | <p>As above.</p>                                     | <p>No evidence of changes to services to disproportionately affect this group.</p> | <p>All persons, irrespective of race, gender, disability, age, ethnicity, religion or sexual orientation should be able to secure access to the same substance misuse treatment services as the rest of the population.</p> <p>In delivering the IOIS, the Service Provider will be “exercising public functions” for the purposes of section 149(2) of the Equality Act 2010. As such, the Service Provider is required to pay due regard to the Public Sector Equality Duty under section 149(1) of that Act and to deliver the Services accordingly. The Equality Act 2010 relates to service users and employees. The Service Provider has responsibilities’ as a provider to service users and as an employer to its employees.</p> <p>In the delivery of any services commissioned on behalf of the Surrey County Council, the Service Provider must demonstrate awareness and be responsive to the accessibility and needs of groups described above either in services or attempting to access services.</p> |
| <p style="text-align: center;"><b>Race</b></p>  | <p>As above.<br/>Similarly to last year’s figure</p> | <p>No evidence of changes to services to disproportionately affect this group.</p> | <p>Evidence shows that services which are culturally and ethnically aware provide better treatment outcomes for their service users.</p>   |

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|   | <p>the vast majority of service users in treatment were White British (3778 - 91%) which is in line with Surrey's ethnic breakdown.</p> |   | <p>The service will be expected to deliver interventions in a way which improve the engagement and retention in treatment of service users from an ethnic background.</p>  |
| <p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 298</p> <p style="text-align: center;"><b>Religion and belief</b></p> | <p>As above.</p>  | <p>No evidence that changes to services will disproportionately affect those of a specific religious background / belief.</p>   | <p>All persons, irrespective of race, gender, disability, age, ethnicity, religion or sexual orientation should be able to secure access to the same substance misuse treatment services as the rest of the population.</p> <p>In delivering the IOIS, the Service Provider will be “exercising public functions” for the purposes of section 149(2) of the Equality Act 2010. As such, the Service Provider is required to pay due regard to the Public Sector Equality Duty under section 149(1) of that Act and to deliver the Services accordingly. The Equality Act 2010 relates to service users and employees. The Service Provider has responsibilities’ as a provider to service users and as an employer to its employees.</p> <p>In the delivery of any services commissioned on behalf of the Surrey County Council, the Service Provider must demonstrate awareness and be responsive to the accessibility and needs of groups described above either in services or attempting to access services.</p> |
| <p style="text-align: center;"><b>Sex</b></p>   | <p>As above.</p>  | <p>No evidence of changes to services to disproportionately affect Male or Female service users.</p> <p>It is, however, expected of the new service to deliver interventions in a way which</p> | <p>All persons, irrespective of race, gender, disability, age, ethnicity, religion or sexual orientation should be able to secure access to the same substance misuse treatment services as the rest of the population.</p> <p>In delivering the IOIS, the Service Provider will be “exercising public functions” for the purposes of section 149(2) of the Equality Act 2010. As such, the</p>  |

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|  |                  | <p>enables female service users to be more confident in accessing the service as traditionally women are under-represented in substance misuse treatment.</p> | <p>Service Provider is required to pay due regard to the Public Sector Equality Duty under section 149(1) of that Act and to deliver the Services accordingly. The Equality Act 2010 relates to service users and employees. The Service Provider has responsibilities' as a provider to service users and as an employer to its employees.</p> <p>In the delivery of any services commissioned on behalf of the Surrey County Council, the Service Provider must demonstrate awareness and be responsive to the accessibility and needs of groups described above either in services or attempting to access services.</p>  |
| <p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 299</p> <p style="text-align: center;"><b>Sexual orientation</b></p> | <p>As above.</p> | <p>No evidence of changes to services to disproportionately affect sexual orientation</p>   | <p>All persons, irrespective of race, gender, disability, age, ethnicity, religion or sexual orientation should be able to secure access to the same substance misuse treatment services as the rest of the population.</p> <p>In delivering the IOIS, the Service Provider will be "exercising public functions" for the purposes of section 149(2) of the Equality Act 2010. As such, the Service Provider is required to pay due regard to the Public Sector Equality Duty under section 149(1) of that Act and to deliver the Services accordingly. The Equality Act 2010 relates to service users and employees. The Service Provider has responsibilities' as a provider to service users and as an employer to its employees.</p> <p>In the delivery of any services commissioned on behalf of the Surrey County Council, the Service Provider must demonstrate awareness and be responsive to the accessibility and needs of groups described above either in services or attempting to access services.</p> |

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| <p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 300</p> <p><b>Marriage and civil partnerships</b></p> | As above. | The marital status is not a criteria considered to access substance misuse services | <p>All persons, irrespective of race, gender, disability, age, ethnicity, religion or sexual orientation should be able to secure access to the same substance misuse treatment services as the rest of the population.</p> <p>In delivering the IOIS, the Service Provider will be “exercising public functions” for the purposes of section 149(2) of the Equality Act 2010. As such, the Service Provider is required to pay due regard to the Public Sector Equality Duty under section 149(1) of that Act and to deliver the Services accordingly. The Equality Act 2010 relates to service users and employees. The Service Provider has responsibilities’ as a provider to service users and as an employer to its employees.</p> <p>In the delivery of any services commissioned on behalf of the Surrey County Council, the Service Provider must demonstrate awareness and be responsive to the accessibility and needs of groups described above either in services or attempting to access services.</p> |
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**7b. Impact of the proposals on staff with protected characteristics**

| Protected characteristic | Potential positive impacts   | Potential negative impacts | Evidence   |
|--------------------------|------------------------------|----------------------------|--|
| Age                      | Non-discriminatory workplace | None                       | <p>In delivering the IOIS, the Service Provider will be “exercising public functions” for the purposes of section 149(2) of the Equality Act 2010. As such, the Service Provider is required to pay due regard to the Public Sector Equality Duty under section 149(1) of that Act and to deliver the Services accordingly. The Equality Act 2010 relates to service users and employees. The Service Provider has responsibilities’ as a provider to service users and as an employer to its employees.</p> |



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| <b>Race</b>                | Non-discriminatory workplace | None | <p>In delivering the IOIS, the Service Provider will be “exercising public functions” for the purposes of section 149(2) of the Equality Act 2010. As such, the Service Provider is required to pay due regard to the Public Sector Equality Duty under section 149(1) of that Act and to deliver the Services accordingly. The Equality Act 2010 relates to service users and employees. The Service Provider has responsibilities’ as a provider to service users and as an employer to its employees.</p>  |
| <b>Religion and belief</b> | Non-discriminatory workplace | None | <p>In delivering the IOIS, the Service Provider will be “exercising public functions” for the purposes of section 149(2) of the Equality Act 2010. As such, the Service Provider is required to pay due regard to the Public Sector Equality Duty under section 149(1) of that Act and to deliver the Services accordingly. The Equality Act 2010 relates to service users and employees. The Service Provider has responsibilities’ as a provider to service users and as an employer to its employees.</p> <p>In delivering the Adult Tier 2 and Low Threshold Tier 3 Substance Misuse Treatment Service, the Service Provider will be “exercising public functions” for the purposes of section 149(2) of the Equality Act 2010. As such, the Service Provider is required to pay due regard to the Public Sector Equality Duty under section 149(1) of that Act and to deliver the Services accordingly. The Equality Act 2010 relates to service users and employees. The Service Provider has responsibilities’ as a provider to service users and as an employer to its employees.</p> |
| <b>Sex</b>                 | Non-discriminatory workplace | None | <p>In delivering the IOIS, the Service Provider will be “exercising public functions” for the purposes of section 149(2) of the Equality Act 2010. As such, the Service Provider is required to pay due regard to the</p>   |

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|  |                              |      | Public Sector Equality Duty under section 149(1) of that Act and to deliver the Services accordingly. The Equality Act 2010 relates to service users and employees. The Service Provider has responsibilities' as a provider to service users and as an employer to its employees.  |
| <b>Sexual orientation</b>              | Non-discriminatory workplace | None | In delivering the IOIS, the Service Provider will be "exercising public functions" for the purposes of section 149(2) of the Equality Act 2010. As such, the Service Provider is required to pay due regard to the Public Sector Equality Duty under section 149(1) of that Act and to deliver the Services accordingly. The Equality Act 2010 relates to service users and employees. The Service Provider has responsibilities' as a provider to service users and as an employer to its employees. |
| <b>Marriage and civil partnerships</b> | Non-discriminatory workplace |      | In delivering the IOIS, the Service Provider will be "exercising public functions" for the purposes of section 149(2) of the Equality Act 2010. As such, the Service Provider is required to pay due regard to the Public Sector Equality Duty under section 149(1) of that Act and to deliver the Services accordingly. The Equality Act 2010 relates to service users and employees. The Service Provider has responsibilities' as a provider to service users and as an employer to its employees. |

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## 8. Amendments to the proposals

| Change | Reason for change |
|--------|-------------------|
| N/A    | N/A               |

## 9. Action plan

| Potential impact (positive or negative)   | Action needed to maximise positive impact or mitigate negative impact  | By when   | Owner   |
|---|--|---|---|
| Change of service and provider for some people might be difficult for existing service users. However it is expected that the staff will TUPE over  | Transition planning between new and existing providers has been built in to enable a smooth transfer of individuals  | By the beginning of the contract : 1 <sup>st</sup> April 2015 | New and existing providers to report to the commissioners |
| More integrated service delivery to service users engaged in the criminal justice system. The new contract will bring together 2 previously separate contracts and treatment provisions under one umbrella. | <p>Ensure there is clear signposting to national and local services through partner agencies (Social Services; Prisons; Police; Health; etc)</p> <p>Where appropriate review referral and moving-on protocols to and from the service;</p> <p>Develop peer mentoring and support networks within the new service;</p> <p>Identify and appoint a service user lead to feedback service delivery to the commissioners from a customer point of view.</p> | From the beginning of the contract                            | The commissioners   |

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## 10. Potential negative impacts that cannot be mitigated

| Potential negative impact  | Protected characteristic(s) that could be affected |
|--|--|
| Service users and TUPE staff may take time to adapt to new arrangements beyond the transitional period | ALL  |

## 11. Summary of key impacts and actions

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| <p><b>Information and engagement underpinning equalities analysis</b></p>                     | <p>The service change has come about as a result of the following analysis :</p> <ul style="list-style-type: none"> <li>• quarterly performance reviews undertaken by Public Health with the current providers;</li> <li>• informal engagement with service users; formal engagement – a Concept Day – with key stakeholders and potential service providers;</li> <li>• review of best practice working with statistical neighbours and through liaison with PHE regional representative</li> <li>• analysis of data from JSNA;</li> <li>• the proposal has also been agreed with colleagues within the commissioning team from Public Health and co-ordinated by SCC procurement.</li> </ul> |
| <p><b>Key impacts (positive and/or negative) on people with protected characteristics</b></p> | <p>Positive impact for all categories with a particular emphasis on :</p> <ul style="list-style-type: none"> <li>• Gender;</li> <li>• LGBT;</li> <li>• Race.</li> </ul> <p>Negative impacts will be minimal although for some service users they may need time to acclimatise to the new service.</p>  |
| <p><b>Changes you have made to the proposal as a result of the EIA</b></p>                    |  |

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| <b>Key mitigating actions planned to address any outstanding negative impacts</b> | Transition planning between new and existing provider has been built in to enable people time to adapt to a new provider in order to enable a smooth transfer of service users. |
| <b>Potential negative impacts that cannot be mitigated</b>                        | Service users and TUPE staff may take time to adapt to new arrangements beyond the transitional period  |