

**TACKLING
DRUGS
CHANGING
LIVES**

**Norfolk Drug and Alcohol
Partnership (N-DAP)**

**Joint Commissioning
Strategies**

DRAFT
**Community Cohesion and
Equalities Impact Assessment**
for consultation

INTRODUCTION

Community Cohesion and Equality Impact Assessment (CCEIA)

A CCEIA is a way of systematically and thoroughly assessing and consulting on the effects that a proposed policy is likely to have on diverse people.

The assessment extends to monitoring the actual effects of the policy once it is put into practice and being alert to any concerns about the way it is (or is not) working.

The main purpose of a CCEIA is to pre-empt the possibility that a policy could affect some groups unfavourably.

This Community Cohesion and Equalities Impact Assessment is based on the tool and guidance produced for Norfolk organisations by the Norwich and Norfolk Racial Equality Council and endorsed by the Government Office for the East of England.

The key principles of a CCEIA are:

- i. A through and systematic analysis of a policy or a proposed policy
- ii. A means to determine the extent of any possible differential impact upon the relevant BME groups
- iii. A measurement on the extent to which any impact may result in an adverse impact
- iv. A tool for which remedial action may be developed and a guide towards effective implementation of such action plans
- v. A CCEIA can measure any negative impact on groups or individuals in relation to one or more of the equality categories. These are:

**Age
Disability
Gender
Race**

**Religion or belief
Sexual orientation**

These six categories are broad headings, with diversity within each of them. For example, gender covers transgender issues, religion or belief includes those with no belief, race includes nationality and ethnic origins and age encompasses issue affecting older people as well as children and young people.

This document is a work in progress and will be updated as both parts of each commissioning strategy are developed during 2008.

COMMUNITY COHESION AND EQUALITY ASSESSMENT TEMPLATE	
Name of policy/procedure:	N-DAP Adults Joint Commissioning Strategy N-DAP Young People's Joint Commissioning Strategy
Area/Department:	Norfolk Drug & Alcohol Partnership
Policy owner:	Norfolk Drug & Alcohol Action Team
Date of assessment:	(1) 05.02.08
Is this a new or existing policy:	New
Person completing assessment:	Catherine McWalter & Anne-Louise Schofield
1. Identify all aims of the policy	
1.1	Identify the aims and projected outcomes of the policy: The strategies aim to explain N-DAPs commissioning activity i.e. how available funding will be used to plan, purchase and monitor substance misuse services in Norfolk. Part 1 of the strategies aimed to set out the context for commissioning and part 2 explains what will be commissioned, how and when.
1.2	Which individuals and organisations are likely to have an interest in or likely to be affected by the policy? The strategies will be of particular interest to those individuals and organisations interested in the field of substance misuse treatment and services and N-DAP partner agencies.

2. Consider the evidence	
2.1 What relevant qualitative information has been considered?	
Age	N-DAP needs assessment processes consider all ages – current work is underway to identify particular needs of older people and this will be reflected in the commissioning strategies.
Disability	This is an area for future research and investigation.
Gender	All needs assessments have considered different needs according to gender. Ongoing contract monitoring work also considers related issues.
Race	Needs in relation to race (defined in the broadest sense) will be investigated during further needs assessment work: early work identified the need for further information.
Religion/belief	As above.
Sexual orientation	Treatment Plans for 2008/09 have identified a need to explore services needed for gay, lesbian and bisexual people.
2.2 What gaps in data/information were identified?	
Age	Services for older people.
Disability	As in section 2.1.
Gender	As in section 2.1.
Race	As in section 2.1.
Religion/belief	As in section 2.1.
Sexual orientation	-
2.3 What consideration has been given to commissioning research?	
Age	Current needs assessment work covers age.
Disability	Research is needed on the needs of substance misusers with a disability.

Gender	Current needs assessment work covers gender.
Race	Further work is needed to investigate the needs of certain groups, e.g. travelling community, Portuguese community, Russian community.
Religion/belief	Further research is needed in this area: and may be best linked to any national research undertaken and then translated for the local area.
Sexual orientation	We need to explore the services necessary to meet needs.
2.4 Assess local and regional initiatives, legal development and legal precedent which might affect the outcome of the policy:	
Age	All N-DAPs services are governed by regional and national guidance from the National Treatment Agency. As statutory services there are a range of legal and regulatory standards which services need to meet and these are detailed in service contract documentation. The DAAT will audit what is in contract documentation to ensure these groups are covered.
Disability	
Gender	
Race	
Religion/belief	
Sexual orientation	
2.5 Assess the impact of any timed action plan through monitoring its implementation which might affect the outcome of the policy:	
Age	None that we are aware of.
Disability	
Gender	
Race	
Religion/belief	
Sexual orientation	
3. Assess Community Cohesion (qualitative and quantitative indicators)	
3.1 Community Cohesion Headline outcome	
Assess qualitative and quantitative indicators to identify people who feel that their local area is a place where people from	Agencies within N-DAP have signed up to the N-DAP diversity statement and all strategic and operational groups within N-DAP

different backgrounds can get on well together	work towards translating this statement into reality.
3.2 Common vision and sense of belonging	
Assess quantitative and qualitative indicators to identify people who feel that they belong to their neighbourhood/local area/County/England/Wales/Britain	Consultation process will address how people affected by the commissioning strategies would want to be involved in future and this will include common vision and sense of belonging in relation to N-DAP services.
3.3 The diversity of people's backgrounds and circumstances are appreciated and positively valued	
Can you identify people who feel that local ethnic differences are respected (give evidence)	No: we have not yet asked this question of our communities or providers, but will do so as part of this consultation process.
Identify number of racial incidents recorded by the organisation, Norwich and Norfolk Racial Equality Council, Crime and Disorder Reduction Partnership, Criminal Justice Agencies and Police and assess its impact on the outcome of the policy	Individual commissioned substance misuse treatment services collect some data on racial incident but this is not collated centrally by the N-DAAT. Compliance with all relevant legislation is a contractual requirement for all of the DAAT commissioned services. This includes the Race Relations Act 1976 and the Race Relations (Amendment) Act 2000.
Identify monitoring mechanism for case work on complaints and action taken to address prolific offenders	The DAAT, hosted by the County Council, would follow existing procedures to deal with any complaints/prolific offenders.
3.4 Those from different backgrounds have similar life opportunities	
Can you identify impact of local concentration of deprivation on community cohesion and outcome of the policy?	Needs assessment work identified Kings Lynn, Norwich and Great Yarmouth as areas of high concentration of deprivation and needs for substance misuse services. Substance misuse treatment services actively engage with people from all the deprived areas of Norfolk. The impact that engagement in substance misuse treatment will have upon community cohesion is unknown at this time.
Can you identify impact of educational achievements of people on community cohesion and outcome of the policy?	Client group of N-DAP are less likely to have achieved well academically and are more likely to be unemployed. A significant proportion of people who engage with N-DAAT commissioned substance misuse treatment services have a history of poor educational attainment and limited work experience. Every attempt is made to refer people into education, training and employment opportunities as part of the holistic response to their

	needs. The impact of this upon community cohesion is uncertain at this time.
Can you identify impact of unemployment on community cohesion and on the outcome of the policy?	As above.
3.5 Strong and positive relationships are being developed between people from different backgrounds in the workplace, schools and neighbourhoods	
Can you identify the level of interaction of people from different backgrounds who mix with other people from different backgrounds in everyday situations, civic and social events?	We know that the numbers of people from ethnic minorities receiving N-DAP services are so low to make conclusions difficult to draw.
3.6 Assessment of engagement using qualitative and quantitative data to identify any possible disengagement linked to specific communities (e.g. ethnic monitoring of attendees participation at consultation events)	
We need to investigate this further, as outlined in previous sections. Needs assessment work has not identified any adverse impact on any groups' ability to engage with the services of N-DAP – the issue is that these groups may not be engaging with the services at all. However, we are aware that some groups (for example parents and the working population) face difficulties attending treatment services during their opening hours (largely 9am – 5pm).	
4. Assess impact of partnership, procurement and contractual arrangements	
4.1 Identify and assess partnership arrangements likely to have an impact on community cohesion, equality and service delivery	
N-DAP, in 2008, is working towards effective service user involvement throughout the structure of the partnership, this is likely to provide the partnership with a greater depth of information and feedback in relation to community cohesion, equality and service delivery which may impact on future partnership strategy development and structure.	
4.2 Identify and assess procurement mechanisms to ensure the elimination of discrimination, promotion of equality of opportunity and good relations between all communities	
The DAAT, hosted by the County Council, will comply with Council (and therefore national and European) regulations regarding procurement – including requesting Equality & Diversity policy statements as part of tendering and contracting. The DAAT will consider this issue specifically during future tendering processes.	
4.3 Identify all contractual arrangements and assess their likely impact on promoting community cohesion, equality and service delivery	
Contract negotiation and monitoring, undertaken by the DAAT, consider equality and will in future consider the promotion of community cohesion. These arrangements should enhance service delivery.	

5. Assess impact of media, campaign and lobbying activities	
5.1 Identify the likely impact of media coverage and assess the activity of the organisation to promote community cohesion, equality and good relations between all communities	
The DAAT takes every opportunity to engage positively with the media in relation to issues surrounding substance misuse. The opportunity is to challenge prevailing stereotypes that are perpetuated about substance misusers and their families. This will, in turn, help to foster greater understanding of their needs within their local community. This will then help to promote greater community cohesion as substance misusers and their families are seen as a part of the local community rather than people to be excluded from it.	
5.2 Identify national, regional and local campaigns likely to impact on community cohesion and assess the activity of the organisation to promote community cohesion, equality and good relations between all communities	
Home Office led National Tackling Drugs Day; national FRANK campaigns; DAAT led Think Safe – Drink Safe campaigns. See 5.1.	
5.3 Identify any local, national and regional lobbying activity and assess their likely impact on community cohesion. State any activity the organisation actively has taken to ensure equality and community cohesion through lobbying	
As an agency working for Norfolk County Council, we are not permitted to engage in political lobbying. A number of the third sector agencies within N-DAP do engage in such activity on a regular basis. The impact of this upon community cohesion is uncertain at this time.	
5.4 Identify and assess any public concern, complaints received or community tension using relevant qualitative and quantitative information with regards to the policy or service delivery impacting on:	
Age	<p style="text-align: center;">DRAFT</p> <p style="text-align: center;">for consultation</p> <p>At this time we have not received any indication of either complaints or community tension arising directly from the development and implementation of this strategy. Members of the general public, however, hold a wide range of views on the issue of substance misuse in general and these are sometimes vocalised at public events. The issues raised are non-specific and do not relate to this strategy.</p>
Disability	
Gender	
Race	
Religion/belief	
Sexual orientation	
6. Assess impact of economic and social barriers	
6.1 Identify barriers likely to impact on the following list and assess any activity the organisation is engaged in to promote community cohesion, equality and good relations between all communities:	
Geographical	Service users of substance misuse services in Norfolk will face certain barriers to accessing services because of the large geographical areas those services cover and issues such as

	<p>poor transport links. N-DAP has worked to ensure there is a needle exchange service within 5 miles of anyone in Norfolk who needs it. All young people's services work county-wide, aiding equality of access.</p>
Education, training and knowledge	<p>The DAAT has established good links with the county media and provides input on a number of local substance misuse issues on the radio, in the press and on TV. The DAAT and N-DAP take part in a number of health promotion fairs / awareness raising activities around the county: For example the 2007 Norfolk show – nearly 7000 school children (from 89 schools) came to the show over two days; Awareness raising training for organisations e.g. St John Ambulance volunteers, Armed Forces, local Employers and Housing providers; the DAAT are part of the UEA Healthy University project (the UEA has more than 2,000 international students each year from well over 100 countries).</p> <p>Barriers to this area of work include rurality issues and limited resources – both financial and DAAT capacity. The Training & Workforce Development Manager is working to develop a web based learning tool that would be accessible across the county wherever someone has access to a PC and the internet – the DAAT will also continue to deliver training across the county.</p>
Economic activity	<p>Seasonality of some work in Norfolk may impact on demand for services in some areas.</p>
Health and wellbeing	<p>N-DAP operate an e-mail based alert system to warn the general substance misusing population when there have been verified reports of illegal drugs in circulation of excessive purity and/or dangerous contaminants. This system enables substance misusers who are not engaged in substance misuse treatment and who are social excluded to access key health information.</p>
Employment	<p>A significant proportion of people who engage with N-DAP commissioned substance misuse treatment services have a history of poor educational attainment and limited work experience. Every attempt is made to refer people into education, training and employment opportunities as part of the holistic response to their needs.</p>
Community safety and policing	<p>Targeted substance misuse enforcement actions by Norfolk Constabulary that have been followed by a series of health and social care intervention in the area. The aim has been to: sign post people into treatment who are adversely affected by the disruption in the local drug supply; to reassure the local population and reduce the fear of crime; and ensure that the local community is made more resilient to drug dealers re-emerging in the area.</p>

Housing	Working closely with partners, N-DAP has produced a Housing Guide for housing providers in relation to people with substance misuse issues.
Regeneration	Targeted substance misuse awareness raising training to health, social care and criminal justice staff working in the most deprived areas of Norwich to promote referrals into substance misuse treatment. This, in turn, will help to promote community cohesion as substance misusers are more able to seek the help that they may require. This has been funded by NRF monies.
Sport and cultural activities	No activity identified at present.
Community and voluntary agencies	N-DAP strives for a level playing field approach for providers, with both commissioning groups managing the process and the market to ensure community and voluntary sector providers are able to engage.

7.1 Assess likely impact of the policy	
Age	Setting out commissioning intentions until 2011 will ensure that the needs of these groups are considered fully as part of the entire treatment/service system in Norfolk. This will result in the potential for increased ease of access to services for all of these groups.
Disability	
Gender	
Race	
Religion/belief	
Sexual orientation	

7.2 From the analysis of data and information, has any additional potential for differential/adverse impact been identified with regards to:	
Gypsy and travellers	Not as yet, further work is required on understanding the needs of this population.
Refugee and asylum seekers	Not as yet, further work is required on understanding the needs of this population.
Young people	Not as yet.
Faith/political community leaders	Not as yet, further work is required on understanding the needs of this population.

7.3 Explain any intentional impact	
Age	Not applicable at this stage.
Disability	
Gender	
Race	
Religion/belief	
Sexual orientation	
7.4 Explain what impact was discovered which you feel is justifiable in order to achieve the overall policy aims, with examples	
Age	Not applicable at this stage.
Disability	
Gender	
Race	
Religion/belief	
Sexual orientation	
7.5 Are there any other factors that might help to explain differential/adverse impact?	
Age	Not applicable at this stage.
Disability	
Gender	
Race	
Religion/belief	
Sexual orientation	
8. Consider alternatives	
8.1 Summarise what changes have been made the policy to remove or reduce the potential for differential/adverse impact	
Not applicable at this stage.	
8.2 Summarise changes to the policy to remove or reduce the potential for differential/adverse impact that were considered but not	

implemented, and explain why this was the case	
Not applicable at this stage.	
8.3 If potential for differential/adverse impact remains explain why implementation is justifiable in order to meet the wider policy aims	
Not applicable at this stage.	
9. Consult formally	
9.1 Has the policy been subject to consultation? If no, please state why not. If yes, state which individuals and organisations were consulted and what form the consultation took	
Age	To be completed post-consultation.
Disability	
Gender	
Race	
Religion/belief	
Sexual orientation	
9.2 What was the outcome of the consultation?	
Age	To be completed post-consultation.
Disability	
Gender	
Race	
Religion/belief	
Sexual orientation	
9.3 Has the policy been reviewed and/or amended in light of the outcomes of the consultation?	
To be completed post-consultation.	
10. Assess public access to information and services	
10.1 Identify any potential barriers to access information and services. Examine if the policy is written in accessible format	
Age	Young people will be consulted on the policy and issues regarding accessibility will be addressed specifically.
Disability	The policy is available in large print, Braille and other formats on

	demand.
Gender	N/A
Race	Via INTRAN, the policy will be made available in different formats on demand.
Religion/belief	The third sector, which includes faith based organisations, are actively engaged in the work of N-DAAT and have the opportunity to participate in the development of this and other strategies.
Sexual orientation	Potential barriers unknown.
11. Assess impact on community cohesion	
11.1 Provide a statement outlining the findings of the impact assessment process on assessing social inclusion, exclusion and impact on community cohesion. If the policy has been identified as having a possibility to adversely impact upon diverse communities, the statement should include the impact of the policy and the justification for the implementation	
To be completed post-consultation.	
12. Decide whether to adopt the policy	
12.1 Provide a statement outlining the findings of the impact assessment process. If the policy has been identified as having a possibility to adversely impact on diverse communities, the statement should include justification for the implementation.	
To be completed post-consultation.	
13. Make monitoring arrangements	
13.1 Monitoring arrangements: specify the following:	
Who will be responsible for monitoring?	N-DAP Joint Commissioning Groups.
How will it be monitored and analysed?	Monthly meetings of the above groups and reports from Joint Commissioning Officers.
When will the analysis take place?	At monthly meetings and awaydays.
Where will the results be recorded?	As part of minutes of meetings and in reports.
Where will the results be reported?	To N-DAP via the Joint Commissioning Officers and in updates on nordat website, six monthly.
13.2 What consideration has been given to piloting the policy?	
Not applicable.	
13.3 What monitoring will be implemented at a national level by the policy owning agency and/or other national agency?	
The National Treatment Agency will continue to monitor N-DAP's performance via national performance targets and half-yearly reviews	

focussing on treatment plans (which will be linked closely to commissioning strategies).

13.4 Is this policy intended to be implemented by local agencies that have a statutory duty to impact assess policies? If so, what monitoring requirements are you placing on that agency?

All partner agencies represented on the Joint Commissioning Groups have a statutory duty to impact assess policies. This CCEIA is shared by all those partner agencies in respect of these commissioning strategies and they are responsible for ensuring monitoring of its impact within their own agencies. Monitoring will take place in the Joint Commissioning Groups.

14. Publish assessment results

14.1 What form will the publication of the impact assessment take?

Publicly available on the nordat website and in other formats on demand.

15. Summary

15.1 Please provide a summary of the findings of the impact assessment against this policy. This section of the impact assessment summary will be used to inform the public and will become a public document.

To be completed post-consultation.

D R A F T

Date on which full assessment completed:

Completed by:

Signature:

Signed by policy owner:

Signature:

Date received:

Review date:

for consultation