

Bolton Council

Report to:	Executive Cabinet Member – Children’s Services		
Date of meeting:	22/11/2021		
Report of:	Director of Children’s Services, Bernie Brown	Report Number:	21488
Reporting Officer:	Paul Rankin, Deputy Director of Children’s Services	Telephone Number:	2010
Contact Officer:	Helen Shearer, Head of Start Well; Strategic Lead Early Years.	Telephone Number:	4246
Report title:	Review of Harvey Nursery post consultation report		
Non-Confidential			
This report does not contain exempt information which requires consideration in the absence of the press or public.			
Purpose:	To set out the results of consultation on proposals to review Harvey Nursery, and to seek approval from the Executive Cabinet Member to implement the final proposals.		
Recommendations:	<p>The Executive Cabinet Member is recommended to:</p> <ul style="list-style-type: none"> • Approve the final proposals, having due regard to the consultation feedback and the Equality Impact Assessment; and • Approve the closure of Harvey Nursery in response to ongoing budget pressures at the end of the academic year August 2022; and • Subject to the approval of the Head of Paid Service, delegate implementation of the closure, including details of redundancy arrangements, to the Chief Executive and Director of Children’s Services. 		
Decision:			
Background documents:	Harvey Consultation Report September 2021		
Appendices:	Appendix 1 Supporting Information Appendix 2 Summary of Consultation Responses Appendix 3 Trades Union responses to the proposals Appendix 4 Equality Impact Assessment Appendix 5 External Consultation Response Summary		
Signed:	Leader/Executive Cabinet Member	Monitoring Officer	
Date:			

Consultation with other officers				
Finance	Yes	20.10.21	Katie Harris	
Legal	Yes	27.10.21	Ceri Owen	
HR	Yes	25.10.21	Dawn Longworth	
Climate Change	Yes	20.10.21	Helen Shearer	
Corporate Programme Manager	Yes	20.10.21	Nicky Connell	
Equality Impact Assessment	Yes	29.10.2021	Rachael Storey	
Post consultation reports Please confirm that the consultation response has been taken into consideration in making the recommendations.			Yes	
Vision outcomes Please identify the appropriate Vision outcome(s) that this report relates or contributes to by putting a cross in the relevant box.			1. Start Well	x
			2. Live Well	
			3. Age Well	
			4. Prosperous	
			5. Clean and Green	
			6. Strong and Distinctive	

1. INTRODUCTION & BACKGROUND

- 1.1. Harvey Nursery is an Early Years registered childcare provider operating as a traded service within the Local Authority. The Nursery delivers funded and fully charged day care for children from 0 to 4 years of age and operates for 51 weeks of the year, five days a week. Harvey Nursery was rated Good by Ofsted in 2018.
- 1.2. Harvey Nursery is an inclusive childcare provider and meets the needs of all children that attend; like all early years registered day care providers it follows the Statutory Early Years Foundation Stage and the Early Years Special Education Needs and Disability code of practice. The Nursery does not offer specialist Special Education Needs and Disability (SEND) support for children under five years of age. Specialist SEND support in Bolton is provided via several "High Needs Bases" These provide an environment that will meet children's learning and development needs, enable integration and are staffed by practitioners able to offer specialism.
- 1.3. There are 62 children currently on roll at the Nursery.
- 1.4. The Nursery is based within the Harvey Start Well Centre (Children's Centre) and is managed within the Start Well Service. The Harvey Start Well Centre's functions are unaffected by the proposed outcomes of this report.
- 1.5. Harvey Nursery continues to face continued financial pressures, primarily due to low occupancy and high running costs, and is unable to set a sustainable budget.
- 1.6. In September 2017, the Executive Cabinet Member approved a report setting out proposals to close Harvey Nursery at the end of the 2017/2018 academic year, which was released for consultation with staff, elected members, trade unions, service users and other relevant stakeholders.
- 1.7. Before the end of the consultation the Deputy Leader of the council at the time released a statement outlining the council's decision to continue to operate the nursery. There would be a staged move to increase income generated from fees and from consumables, to reduce the level of subsidy which the council provided.
- 1.8. A final report was approved in December 2017 by the Executive Cabinet Member, which recommended a working group be established to develop a sustainable business model for the nursery from April 2018, and to reduce the deficit and current level of subsidy provided by Bolton Council. Harvey Nursery Collaborative Management Committee was set up as a time limited group, to make recommendations and develop a business plan. It did not act in a governance capacity for the nursery. The new business model was approved by the Executive Member for Children's Services in January 2019 and was fully implemented by July 2019.
- 1.9. In November 2020 the Executive Cabinet Member for Children's Services approved proposals for consultation with staff, unions and stakeholders suggesting a possible closure date of March 2021.
- 1.10. The report was further considered at a meeting of the Children's Services Scrutiny Committee on 22nd December 2020. At this meeting the decision was referred to Council for further consideration, including exploring the financial options, which took place on 13th January 2021. The report was then referred back to the Executive Cabinet Member for further consideration. Since January 2021, the work of the Collaborative Management Committee has been reviewed again to establish whether any further options could be taken forward to balance the budget, however this exercise did not identify any viable solutions.

- 1.11. The proposals to consult on the closure of the Nursery were further considered by the Executive Cabinet Member in September 2021. The decision was made to progress with the consultation. The consultation was carried out with staff, service users, the public and key stakeholders over a 30 day period.
- 1.12. This report sets out the final proposals to close the Harvey Nursery provision following consultation. Harvey Nursery has been unable to set a sustainable budget and is operating at an increasing deficit. It has not been possible to reduce the level of subsidy which the council provides, and should the closure be approved, the projected budget deficit of £121,343 would be removed.
- 1.13. Following the formal consultation period, this report now addresses the key issues arising and puts forward the final proposals for approval by the Executive Cabinet Member.

2. ACTION TAKEN SINCE 2019

- 2.1 The business case was based on reaching 75% occupancy in order to break even, excluding costs associated with the building. Between 2019 and 2021 the maximum nursery occupancy was 52%.
- 2.2 The total occupancy of the nursery had been costed up to increase the 46 full time equivalent nursery places for 0-5-year-olds to 68 full time equivalent nursery places. This equated to 680 sessions of childcare across all age phases,
- 2.3 Occupancy of Harvey Nursery since March 2019 is summarised in the Table 1 below.

Table 1 Harvey Nursery Occupancy 2019-2021

Age Phase	March 2019		March 2021		September 2020		May 2021		September 2021	
	Sessions occupied	% of full capacity								
0-2	25	20%	30	25%	22	18%	37	31%	40	33%
2-3	135	52%	145	60%	145	60%	155	65%	144	60%
3-4	135	42%	111	34%	111	34%	160	50%	118	39%
Total	295	43%	286	42%	278	41%	352	52%	302	44%

- 2.4 The inability to sustain occupancy above 52% is primarily due to current childcare sufficiency in Bolton. Across the Borough there is a surplus of childcare places available for all children eligible for early years free entitlement provision and for fee paying places.
- 2.5 The areas of focus for the business case were based on occupancy and meeting the childcare market demand. The nursery, like all Day Care providers, faces competition from other childcare providers. There are 20 childcare and early education providers within Harvey Nursery's immediate area. This is an increase of 3 providers since September 2017. Childcare provider numbers have increased across the three wards of Great Lever, Rumworth and Halliwell from 42 providers to 47 providers.
- 2.6 Childcare providers across the 3 wards have reported full time vacancies across all age phases in their provision. See table 2.

Table 2 Capacity data for 3 Wards as reported 20/07/2021

a) Group providers including schools

Ward	Age 0 - 2		Age 2-3 (2yo)		Age 3 - 4 (3yo)		Age 4 - 5 (4yo)	
	Capacity sessions	Vacancies sessions						
Great Lever	198	20	354	18	682	58	526	14
Halliwell	90	36	244	142	488	174	0	0
Rumworth	0	0	112	16	434	70	0	0
Total	288	56	720	176	1604	302	526	14

b) Childminders

Ward	Age 0 - 1		Age 1 - 5	
	Capacity sessions	Vacancies sessions	Capacity sessions	Vacancies sessions
Great Lever	20	14	34	22
Halliwell	2	2	8	8
Rumworth	2	0	4	0
Total	24	16	46	30

- 2.7 Most providers report that they are not meeting occupancy targets. This data was taken in the summer term 2021, which, historically for all providers, has the highest take up figures for the year, and there were still places not filled.
- 2.8 Providers have reported challenges in meeting occupancy figures prior to the COVID-19 Pandemic. The impact of Covid-19 has further had a direct effect on the take up of childcare places across the borough. Childcare requirements are changing, due to changes in employment circumstances, and the take up of full-time places and wrap-around care has significantly reduced. This has impacted on all childcare providers and, as a result, there is a higher proportion of childcare vacancies in Bolton.
- 2.9 The Families Information Service (FIS) offers a Childcare brokerage service for Bolton families seeking childcare places. The service has not reported any unmet demand for childcare places in these 3 wards. The proposed closure of Harvey Nursery would not result in a shortfall of childcare places for families within the local community, as there is a surplus of quality childcare places across the immediate ward area. The FIS will be a key agency in supporting parents to secure places in alternative provision.
- 2.10 The Harvey Nursery management has reviewed staffing levels, examining staff hours and ceasing the dependency on agency staff, as agreed through the Harvey Nursery Collaborative Management Committee business plan.
- 2.11 Prior to the pandemic, additional agency staff were needed to manage the fluctuation in numbers across the day between 8am and 6pm. The numbers of families requesting wrap-around care and additional hours reduced during the pandemic and take up was very low at the end of each day.
- 2.12 During the first Covid lockdown the nursery management agreed to shorten the day in order to meet the Covid requirements and minimise movement between rooms for children and staff. This shorter day meant the staffing structure was much more cost effective, but unfortunately was still not balancing the budget. It was agreed following consultation with parents to keep the reduced opening hours of 8.30 am to 4.30pm, but to review it each term and if more requests for extended provision were received, to reconsider.

- 2.13 The nursery fees were increased by 20% in 2019 and further increased in 2021 in line with current Bolton childcare costs. Due to a drop in the number of families seeking additional hours or wrap-around care, income from extra hours and consumables have not reached the business model target. The number of children paying for nursery meals has reduced and income from meals has not met the business case projections.
- 2.14 Parents choosing to access funded places only, and not taking up sessions to extend their child day with wrap-around hours or requesting and paying for meals, has been another factor in the nursery's inability to generate income.
- 2.15 Since 2019 the nursery management has implemented a marketing plan which included: Open days to raise awareness of the nursery provision; Leaflet drops; Bespoke banners, Updated information pack for new enquiries; Harvey Nursery Facebook page to raise awareness of the nursery and the impact Early education can have on children's education; Inviting parents to comment and to make recommendations.

3 CONSULTATION PROCESS

- 3.1 Consultation on the proposed changes to the service was carried out for a period of 30 days from 20th September 2021. A summary of the key issues raised during consultation is included at Appendix 2.

Trade Unions

- Weekly consultation meetings with a consultation log circulated after each meeting;
- Responding to specific requests for information from the trade unions;

Staff

- A formal briefing session and presentation for all staff;
- Information including, in addition to some of the things listed below, the original report, a draft timetable, details of support for staff, and a comments and questions form;
- Maintenance of a staff teamsite using SharePoint for staff to access information;
- Holding individual meetings with members of staff, attended by HR and/or trade union representatives where required.

Stakeholder consultation

- Face-to-face consultation sessions with parents and carers of children attending Harvey Nursery;
- Electronic survey shared with:
 - 400 early years providers
 - Early Education groups
 - Wider Stakeholder groups

Key issues raised during consultation

- 3.2 The formal trade union responses to the proposals are attached in full at Appendix 3.
- 3.3 Appendix 2 sets out a summary of the key issues raised, and the response from management. This includes issues raised via the unions at weekly consultation meetings, as well as issues raised by individual staff members via emails, personal meetings and staff briefing sessions. In summary, the main issues raised were:
- Marketing and promotion of the nursery; questions on what was done to support the marketing of the nursery and whether more could have been done by the council;;
 - The occupancy figures and take up of places, both pre- and post-Covid.

External/Stakeholder consultation

- 3.4 No alternative proposals were received regarding the closure of Harvey Nursery.
- 3.5 Most responses from childcare providers and those working in the sector stated that the proposed closure would support their sustainability and help to address low occupancy levels that they are facing. Nearly all asked for parents to be redirected to their setting via recommendations from the council.
- 3.6 A response was received to the consultation from an education provider wanting to explore ways they felt they could work together to develop a more sustainable leadership model for the nursery. A meeting was convened to discuss this further, however on more detailed discussion the provider felt that there was not a viable business case to take this forward.
- 3.7 Concerns were raised by some parents about finding comparable provision in the same locality. More details of other early years providers in the surrounding area can be found in Appendix 1, many of which have spare capacity. If the decision is taken to close the nursery the FIS will support parents to access Ofsted registered provision in the area.
- 3.8 Survey respondents raised concerns about the transitional impact on children, and any negative financial impact, due to a perception that Harvey Nursery fees are subsidised. The current costs are slightly below regional average and in line with other local providers. The hourly rate for children under 2 is £4.49, compared with an average of £4.64 across the North West. For children over the age of two the hourly rate is £4.28, compared with an average of £4.44 across the North West. There are various schemes available for assistance with childcare costs. If the decision is taken to close the nursery the FIS will ensure that parents/carers are supported to access all financial support they are entitled to.
- 3.9 Parents and carers of children with SEND raised concerns about transition and finding appropriate provision to meet their needs. As the Nursery does not specialise in SEND support, many other local providers will be able to facilitate a similar offer as part of their Ofsted registration requirement. If the decision is taken to close the nursery the FIS will support parents and carers to access inclusive provision to meet their child's or children's needs.
- 3.10 It is clear that parents and carers really value the staff at Harvey Nursery and the care and support they are given. The 10 parents and carers who met to discuss the implications in one-to-one meetings were clear that they valued the nursery and could see the difference it had made for their child/ren.
- 3.11 Parents and carers requested that the nursery be kept open to the end of the academic year, i.e. August 2022, to support working parents/carers who will still require childcare through the summer holiday and to avoid an additional transition for children starting school in September. It is therefore proposed that the nursery provision be continued to 31st August 2022 for those children who will be moving to primary school in September 2022.
- 3.12 Suggestions were received during the consultation process to review the marketing strategy or to employ a business manager. Marketing measures and a plan have been in place for some time, however these have not enabled sufficient increase in take up of places. While further measures could improve the take up, it is unlikely that they would allow for significant increases while there are vacancies across all providers in the area.
- 3.13 On the 6th October a motion was passed at the meeting of Council to bring back a report to the Executive Cabinet Member to identify what work has taken place since January 2021, to attempt to save Harvey Nursery from closure. The consultation report in September referenced the review of the previous work of the management committee which looked extensively at a range of options

before developing the business model. No other viable options have been identified via the consultation process or review of this work which would allow for delivery of a balanced budget.

4 OPTIONS

- 4.1 Do nothing and keep the nursery open – this is not financially viable nor a good use of public funds, particularly in the context of cuts to other key services and the availability of high quality alternative providers.
- 4.2 Close the nursery to avoid further financial losses and to support the sustainability of other providers.

5 IMPACTS AND IMPLICATIONS:

5.1 Financial

- 5.1.1 Harvey Nursery operates as a traded service, which means that there is an expectation that the income that it generates should at least cover the direct costs of running the service.
- 5.1.2 The financial position over recent years for Harvey Nursery operating as a traded service can be seen in the table below. This shows the nursery has operated at a loss over these years, and in the 2020/21 financial year Harvey Nursery ran at a deficit of £120,263, with a 21/22 projected deficit of £121,343.
- 5.1.3 Table 3 below excludes premises costs. In the September 2018 report the Executive Cabinet Member agreed that the premises costs would not be charged to the Day Care budget, as it would not be viable to do so. Premises and support costs therefore increase the deficit further.

Table 3 Financial Position

	17/18 Outturn	18/19 Outturn	19/20 Outturn	20/21 Outturn
<i>Employees</i>	267,541	234,577	286,208	325,710
<i>Premises</i>	1,333	869	0	402
<i>Transport</i>	0	0	0	0
<i>Supplies</i>	19,488	20,147	14,620	9,322
<i>Third Party</i>	82,469	78,496	27,768	7,638
<i>Central Support</i>	1,628	869	636	1,732
<i>Capital Financing</i>	0	0	0	0
<i>Income</i>	-315,282	-257,637	-278,565	-224,541
Deficit	57,177	77,321	50,667	120,263

- 5.1.4 Not charging additional premises costs of £49,600 per annum for the space Harvey Nursery occupies contributes to a loss of income to the council and does not ensure that an equitable offer is in place for all Early Years Providers leasing space within the Start Well Centres.
- 5.1.5 As well as the direct costs of running the service, Harvey Nursery receives additional support to the value of £62,200 per annum. This support charge is often calculated for traded services to show the true cost of running the service and includes costs associated with Leadership, ICT and all other support services. This support charge is not included in Table 3 above.

5.1.6 The projected deficit of £121,343 creates a financial pressure to the council. If the recommendation to close the nursery is approved, it would ensure cessation of future financial pressures in respect of the deficit at Harvey Nursery.

5.2 Legal

5.2.1 NONE

5.3 Staff and Establishment Implications

5.3.1 All staff employed within the nursery will be in a redundancy situation. Staff will be managed and supported in line with the council's restructure, redundancy, and redeployment policy framework.

5.3.2 All staff employed in the nursery have, during consultation, requested their VER/VR figures, and the majority of staff have indicated that they would accept the offer of VR/VER should the nursery close.

5.3.3 Should any staff members choose to remain with the council, we would work closely with them in trying to secure alternative employment within the council via the redeployment process. Since consultation began, and continuing, we have shared details of all advertised posts within the council with all the nursery staff, and they have been given priority access to the posts in line with council policy.

Table A: The following posts (currently held vacant) would be disestablished:

FTE	Existing Job Title	Grade
0.86	Senior Early Years Worker	D
1.81	Early Years Worker	B

Table B: The following posts would be redundant from the current structure:

FTE	No. Staff	Existing Job Title	Grade
1	1	Manager	G
1	1	Deputy Manager	F
1.29	2	Senior Early Years Worker	D
8.98	11	Early Years Worker	B
0.88	1	Cook	C

5.4 Climate Change

5.4.1 There are no direct climate change implications to these proposals.

5.5 Other

5.5.1 Harvey Start Well Centre is included within a Public Consultation that is proposing that responsibilities for Start Well Centre buildings be realigned and renamed as a Start Well Family Hub. The Centre would operate longer opening times, including evenings and weekends, to enable a flexible approach to meet the needs of children, young people and families.

5.5.2 Services across the Family Hubs will include;

- Community Midwifery
- 0-19 Public Health Nurses (Health Visitors)
- Start Well Locality team (0-5yr)
- Voluntary sector partners
- Early Years Communication and Language Service
- Family Time service
- Family Information Support
- Perinatal & Parent Infant Mental Health Service
- Enhancing Families Team
- Targeted Early Help
- CAHMS
- Dietetics teams

5.5.3 Whilst this is a separate consultation it is important to note that the intent to repurpose the Harvey Start Well Centre into a Start Well Family Hub will be an asset to the community. It will support families and children in the locality by providing a timelier response, which will help prevent escalation, and give families access to the Family Hub service at a suitable time for them, thus improving uptake and engagement.

6 EQUALITY IMPACT ASSESSMENT (EIA)

6.1 Under the Equality Act 2010, the council has a general duty to have due regard to the need to:

1. **eliminate unlawful discrimination**, harassment, victimisation and any other conduct prohibited by the Act;
2. **advance equality of opportunity** between people who share a protected characteristic and people who do not share it; and
3. **foster good relations** between people who share a protected characteristic and people who do not share it.

6.2 It is therefore important to consider how the proposals contained within this report may positively or negatively affect this work. To support this analysis, an Equality Impact Assessment (EIA) has been carried out on the proposals outlined in this report, and is attached at Appendix 4.

- 6.3 The EIA looks at the anticipated (positive and/or negative) impacts of the proposal on people from Bolton's diverse communities, and whether any group (or groups), including staff, is/are likely to be directly or indirectly differentially affected. This EIA builds on the exercise which was completed on the initial review options, and summarises the stakeholder consultation which has been completed as part of this review.
- 6.4 The equality considerations are set out in more detail in the EIA at Appendix 5. Should the proposals be approved by the Executive Cabinet Member, they will be kept under review as part of the overall budget process.

7 CONSULTATION

- 7.1 See section 2 of this report.

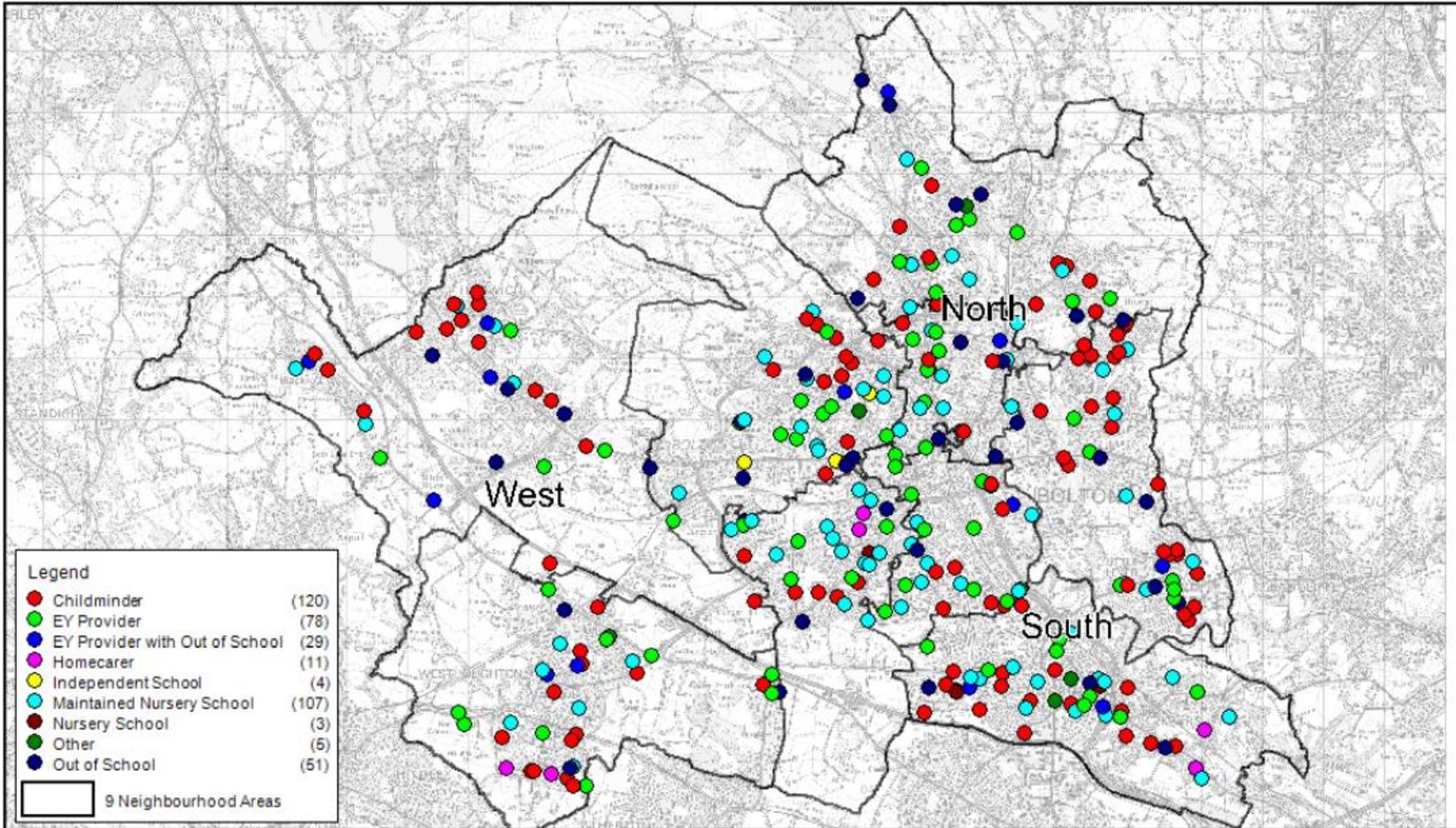
8 VISION 2030

- 8.1 In order for Bolton Council to contribute to the Vision 2030 Strategy it will need to manage complex programmes of change across the organisation, making sure they are deliverable, accountable and effective. Within the Vision 2030 Strategy, the council will strive to deliver services more efficiently, through service improvement, redesign, recommissioning and decommissioning, based on evidence of impact. The proposals within this report contribute to this strategic council aim.

9 RECOMMENDATIONS

- 9.1 The Executive Cabinet Member is recommended to:
- Approve the final proposals, having due regard to the consultation feedback and the Equality Impact Assessment; and
 - Approve the closure of Harvey Nursery in response to ongoing budget pressures at the end of the academic year August 2022; and
 - Subject to the approval of the Head of Paid Service, delegate implementation of the closure, including details of redundancy arrangements, to the Chief Executive and Director of Children's Services.

Appendix 1: Further Supporting Information



Bolton
Council

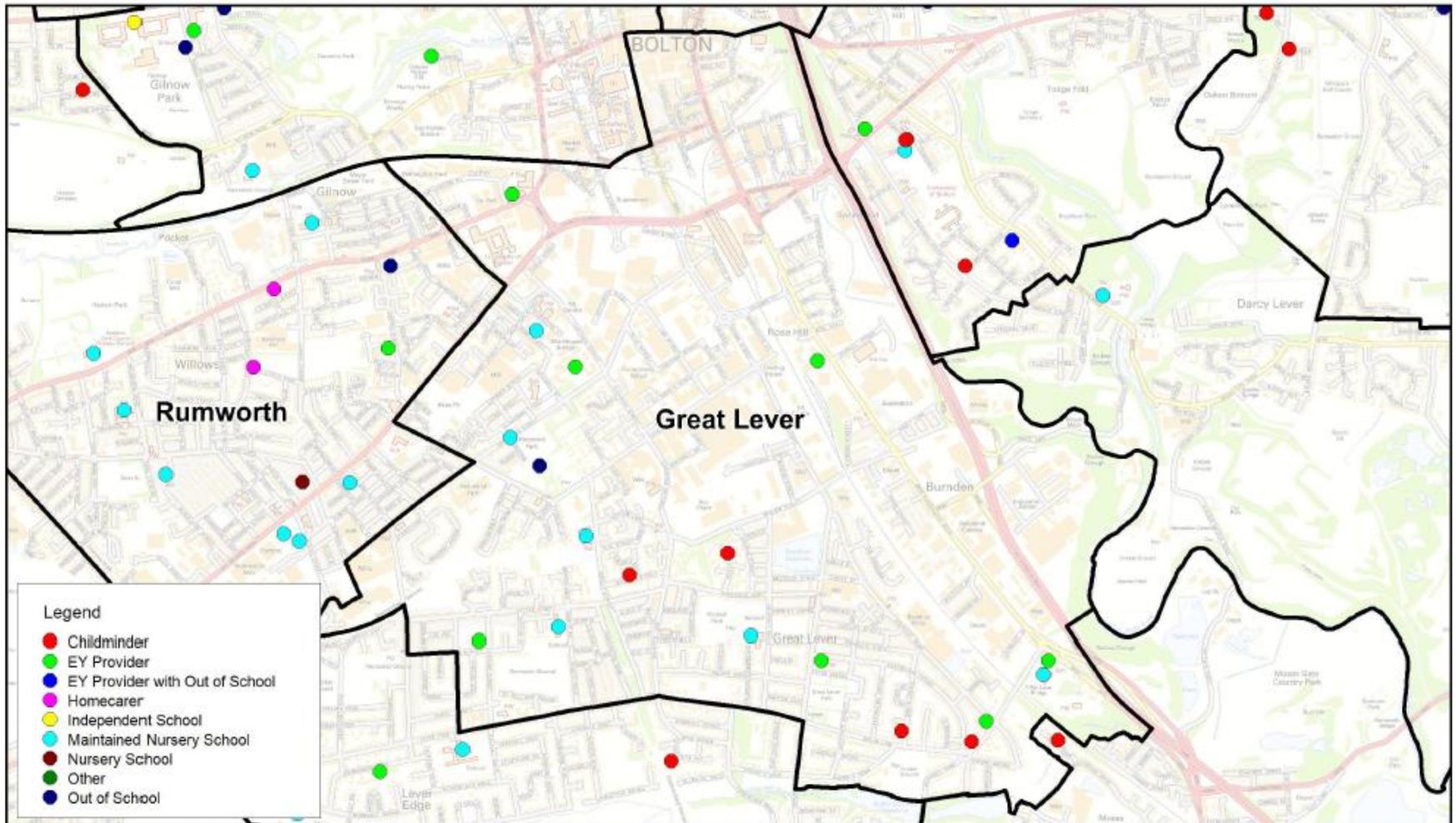
Department of
People Services
Policy & Strategy

**Childcare Sufficiency
Provider Map 2021**

prepared by: Jude Curtis
reference: Childcare Sufficiency
date: 12/10/2021

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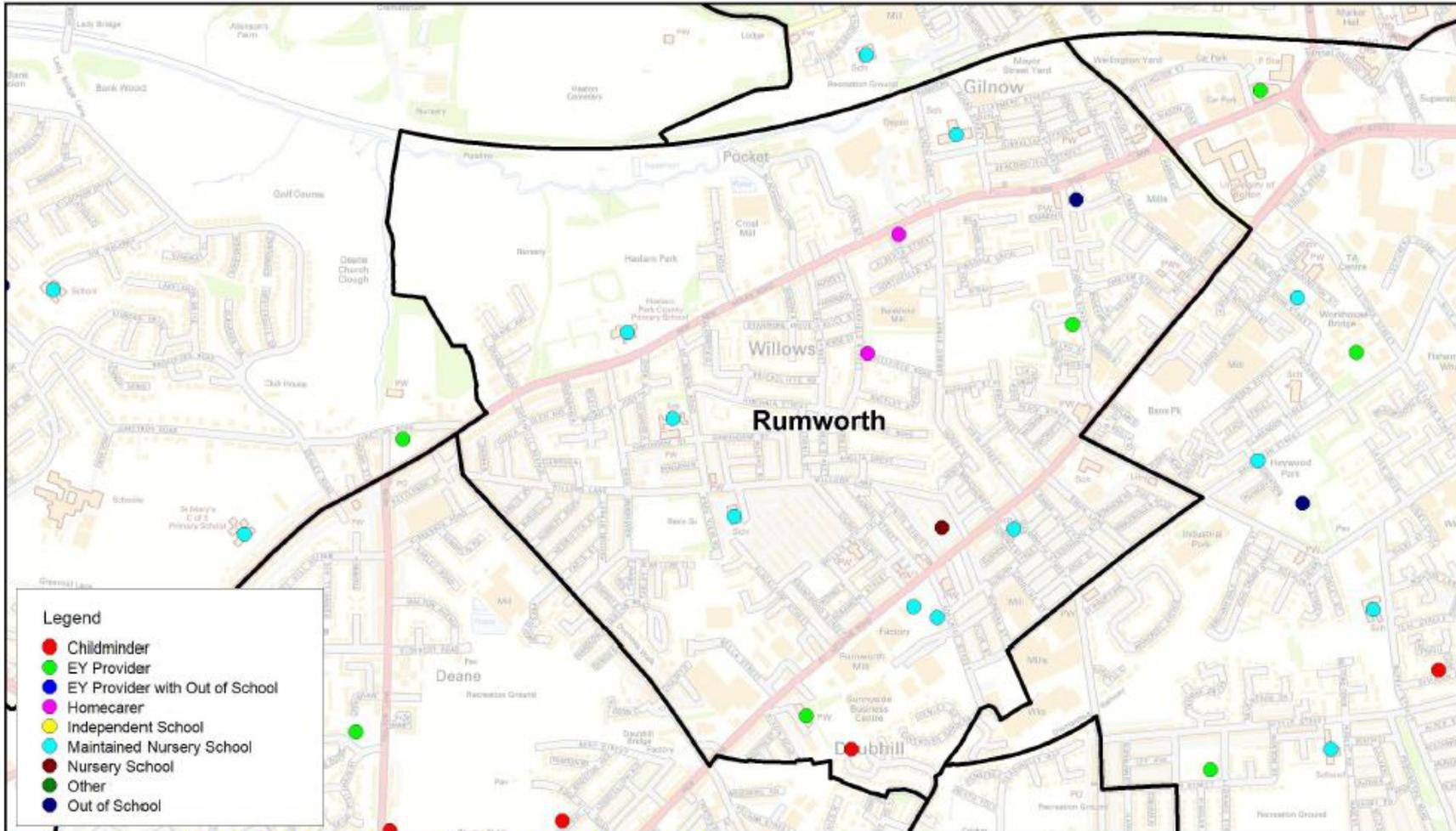
Department of Children
Policy & Strategy

**Childcare Sufficiency
Provider Map 2021
Great Lever**

prepared by: Jaqui Theaker
reference: ID2125 -
Childcare Sufficiency
Assessment
date: 27/10/2021

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Department of Children
Policy & Strategy

**Childcare Sufficiency
Provider Map 2021
Rumworth**

prepared by: Jaqui Theaker
reference: ID2125 -
Childcare Sufficiency
Assessment
date: 27/10/2021

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Appendix 2: Summary of Consultation Issues and Responses

Please note that a redacted version of the full consultation log is available upon request. Key: TU – Trade unions; I – Individual Staff member; S = External Stakeholder

From whom? TU//S	Issue Raised	Management Response/comments
TU	<i>Request for clarity around the business model used and occupancy figures detailed within the consultation report.</i>	<p>The staffing structure and occupancy of the nursery is based on the overall size and space in the nursery and what could maximise income. The 'Covid model' involved shortening the opening times of the Nursery in order to meet the Covid requirements and to minimise movement between rooms for children and staff. The shorter day meant that the staffing structure was much more cost effective (albeit still not financially sustainable) and following consultation with parents it was agreed it should remain but be reviewed termly. The current use of staffing means that the numbers of children at any one time of the day are maximised. Data was shared regarding occupancy across the 3 wards.</p> <p>Recent sufficiency data showed that there was a surplus of childcare places since restrictions have eased for Early years providers. From July 2020 childcare demand has changed across the borough and providers report a reduction in requirements for wrap around care and reduction of income. The surplus of childcare places across the borough has contributed to Harvey Nursery not meeting its occupancy target. The closure of the nursery is not related to the quality of the provision.</p>
TU	<i>Challenges relating to the Promotion, Marketing and advertising of the Nursery</i>	Marketing for the nursery was managed within the traded service. A plan was put into place by the nursery which ran from June 2019 after the appointment of the Nursery Manager.

		<p>Work undertaken following the last review has included reviewing staffing arrangements, session times and recruitment to posts. Due to capacity concerns The Start Well Commercial & Strategy Team has also supported the Nursery Manager with marketing meetings.</p> <p>Actions taken have included –</p> <ul style="list-style-type: none"> • Branding developed to raise profile of Harvey Nursery to increase registrations and occupancy • Promotional materials and tools to raise the profile of Harvey Nursery • Raising the profile of Harvey Nursery through developing a presence through local media, internet and community activities. <p>Additional resources were made available to the nursery, including Officer time from Start Well Development Manager, Start Well Development Officer as well as additional support from the Start Well Childcare Advisor who took over the line management of the Nursery Manager.</p>
TU	Harvey Nursery should have been promoted across the borough as the flagship of 'Good' practice/centre of excellence. Why was this never done? This could have brought extra revenue in.	The council has a statutory duty to promote all providers equally and this could be seen as promoting this nursery over others. There would be an additional cost to the council of opening the building later for training, and any income for use of the building would go against other income streams, as the nursery doesn't contribute to building costs. Any suggestions to support the business model were welcomed, however none were received. A number of providers across the borough are Ofsted graded as Outstanding and would challenge Harvey using the title 'centre of excellence'. Harvey like other private, voluntary and independent provision has good practice to share and this has been shared with other providers.
TU	Why is the nursery not being promoted through Start Well services and the council? It is a council service.	The council has a wider sufficiency duty and needs to equally promote all provisions. Support has been provided by the council, for example the Start Well Development Manager started up the Facebook page for the Nursery and also attended Nursery marketing meetings. The Head of Service intervened when progress seemed slow and there were capacity

		issues.
TU	Impact on families and the community	<p>Our information around sufficiency confirms that there are sufficient places with other childcare providers in the vicinity. We will support families to gain access to provision via the Families Information Service. There is a full range of provision so is lots of parental choice.</p> <p>Harvey Start Well Centre will continue to remain open. There are no wider implications to the Start Well Centre.</p> <p>We will also ensure that places are available until 31st August 2022, which will allow any four year olds to transition straight to primary school, without the need to change nurseries for a short period of time.</p>

Appendix 3: Formal Responses from the Trades Unions



Unison response of the report
21240
to executive cabinet member
October 2021

Unison Bolton Branch 6540
Senior Steward: Jane Howarth

UNISON response to the report to Executive members, October 2021 for the Review of Harvey Nursery.

Unison is somewhat disappointed that this is the third review of Harvey nursery, the first being overturned, then a collaborative committee was set up from February 2018 until June 2019 with several partners to find a sustainable business model for the nursery, there was no further communication or feedback to partners around the financial situation of Harvey nursery after June 2019.

We were only made aware of the situation when the second review came in December 2020, this report was called in for scrutiny, which resulted in a second reprieve for the nursery. Then in September 2021 we were called for a third time to a review meeting with proposals to close the nursery.

There are some concerns with the table in 2.3 the second, third & fourth columns are all occupancy levels throughout the pandemic, using these figures is a detriment to the nursery as Bolton struggled with local restrictions throughout the pandemic.

The occupancy levels sighted in the report are from the original business model however during the pandemic the nursery reduced their working day this has resulted in the nursery never being sustainable under the current model of a shorter day this is not reflected in the report and built false hope for staff and parents alike

The whole process has resulted in a great amount of stress and anxiety for staff and families especially at the present time on the back of Covid-19 when peoples mental health has already suffered.

Families who have visited the nursery for a potential place have been told that the nursery is open then its closing and so on, this has had an impact on the potential taking up of places.

Staff feel let down by the people that have been put in place to support them, they work together to provide an excellent safe and secure service to children and their families, by promoting Early years to an excellent level, using the most influential time in children's lives, and closing the nursery down will mean the loss of the excellent work and the service provided by the staff at Harvey nursery.

During the first lockdown the nursery became a childcare Hub the staff put themselves at the forefront by caring for the children of frontline workers, putting themselves and their families at risk, they did their job for those families, they never complained and never refused to take children most from other settings that were not open, here they are again asking for help and support to save the Nursery and they feel rejected and unsupported.

Unison Bolton Branch 6540 Senior: Jane Howarth

Appendix 4- Equality Impact Assessment

Equality Impact Assessment

Title of report or proposal:
Review of Harvey Nursery (Post Consultation)

Directorate:	Children's Services
Section:	Start Well
Date:	22 nd November 2021

Public sector bodies need to be able to evidence that they have given due regard to the impact and potential impact on all people with 'protected characteristics' in shaping policy, in delivering services, and in relation to their own employees.

Under the Equality Act 2010, the council has a general duty to have due regard to the need to:

1. **eliminate unlawful discrimination**, harassment, victimisation and any other conduct prohibited by the Act;
2. **advance equality of opportunity** between people who share a protected characteristic and people who do not share it; and
3. **foster good relations** between people who share a protected characteristic and people who do not share it.

By completing the following questions the three parts of the equality duty will be consciously considered as part of the decision-making process.

Details of the outcome of the Equality Impact Assessment must also be included in the main body of the report.

1. Describe in summary the aims, objectives and purpose of the proposal, including desired outcomes.

Harvey Nursery is a Local Authority led nursery providing early education and childcare places to children 0-5 years of age, for 51 weeks of the year. The Nursery is based within the Harvey Start Well Centre (Children Centre) and is managed within the Start Well Service. The Harvey Start Well Centre's functions are unaffected by the proposal in this report, this is solely regarding the proposals regarding the children's nursery provision.

This report sets out the proposal for consultation on the closure of Harvey Nursery in response to ongoing budget pressures. If agreed, the proposals would prevent the projected annual budget deficit of £121,343.

Since the last proposal to close the nursery the Collaborative Management Committee has reviewed the situation again to establish whether any further options could be taken forward to balance the budget however this did not identify any further viable solutions.

The proposals indicate closure of the nursery provision and a potential overall reduction in the staff establishment of 15.82 Full-Time Equivalents (FTE) of which 2.67 FTE are currently held vacant.

In September 2021, the Executive Cabinet Members approved a report setting out proposals to address the challenges faced by closing Harvey Nursery, for consultation with staff, elected members, trade unions, service users and other relevant stakeholders. Following the formal consultation period, the report now addresses the key issues arising and puts forward the final proposals for approval by the Executive Cabinet Member.

The report sets out a summary of the key consultation issues raised. The Equality Impact Assessment has been updated to take into consideration any anticipated impacts and proposed mitigations.

2. Is this a new policy / function / service or review of existing one?

This is a review of an existing service.

3. Who are the main stakeholders in relation to the proposal?

- Current service users of Harvey nursery provision - Children and families
- Potential future users of Harvey nursery provision – Children and families
- Staff employed at Harvey nursery provision
- Trade Unions
- Local Childcare/early years providers
- Other related Council Departments
- Ward Members

The report from September 2021, setting out proposals to changes to the service, formed the basis for consultation with staff, elected members, trade unions, service users and other relevant stakeholders.

4. In summary, what are the anticipated (positive or negative) impacts of the proposal?

The proposal will relieve budgetary pressure on the Council budget. It was noted also during consultation, mainly from private providers who responded, that the closure would have a positive

impact on surplus places within their settings, as well as supporting the sustainability of the wider sector.

The proposal would ultimately see the closure of the day nursery at Harvey Start Well centre and a reduction in the Council's staff establishment.

Subject to approval of the proposals, staff impacted and in a redundancy situation will be managed and supported in line with the council's restructure, redundancy and redeployment policy framework.

There may be a possible disproportionate impact on women as a result of wider social pressures and historic issues relating to the gender balance within employment in the care sector.

The proposal would reduce local authority managed provision of early years services and reduce early years choice options for future service users. However, the impact would be mitigated as across the Borough there is a surplus of childcare places available for all children eligible for early years free entitlement provision. Harvey Nursery is located within the Great Lever ward of Bolton and (in July 2021) there were 20 childcare and early education providers within this ward, an increase of 3 providers since September 2017. In July 2021, it was noted that childcare provider numbers had increased across the three wards of Great Lever, Rumworth and Halliwell from 42 providers to 47 providers.

Through consultation, concerns were raised relating to finding comparable provision in the same locality, transitional impact on children, financial impact and the wellbeing of children and their parents/carers. Following the formal consultation period, the report now addresses the key issues arising and puts forward the final proposals for approval by the Executive Cabinet Member.

The report sets out a summary of the key consultation issues raised by staff, trade unions, service users and the public and the response from management.

5. What, if any, cumulative impact could the proposal have?

The most recent information suggests there are vacant places across all age groups in early years provision in Bolton in the Harvey nursery catchment area, in excess of those currently provided at Harvey Nursery, and the proposed closure of Harvey Nursery should not result in a significant negative impact on childcare places for families within the local community. However, it is noted that the removal of the Harvey nursery provision would result in reduced choice for children and their families in terms of early years provision. The local authority will continue to monitor provision in the area and new providers would be encouraged into the market if there are concerns about the amount and range of provision available.

6. With regard to the stakeholders identified above and the diversity groups set out below:

Consider:

- How to avoid, reduce or minimise negative impact (if you identify unlawful discrimination, including victimisation and harassment, you must stop the action and take advice immediately).
- How to **advance equality of opportunity**. This means considering the need to:
 - Remove or minimise disadvantages suffered by people with protected characteristics due to having that characteristic.
 - Take steps to meet the needs of people with protected characteristics that are different from people who do not have that characteristic
 - Encourage protected groups to participate in public life and in any other activity where participation is disproportionately low
- How to **foster good relations**. This means considering the need to:
 - Tackle prejudice; and
 - promote understanding between people who share a protected characteristic and others.

	List any adverse impacts identified from data or engagement	Can this adverse impact be justified on the grounds of promoting equality of opportunity for one group, or for any other reason? Please state why	Please detail what actions you will take to remedy any identified adverse impact i.e. actions to eliminate discrimination, advance equality of opportunity and foster good relations

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<p>Race (this includes ethnic or national origins, colour or nationality, and caste, and includes refugees and migrants; and gypsies and travellers)</p>	<p>Whilst it is acknowledged that the nursery supports a part of the borough that has a comparatively high proportion of families from minority ethnic backgrounds, it is not anticipated that this, in itself, raises potential for significant differential impact on the grounds of race.</p>	<p>With regard to all the groups identified in this assessment, it should be noted that this proposal is driven by the corporate and departmental need to significantly reduce spend in line with national budget reductions and the need to set a balanced budget.</p>	<p>These proposals have been subject to consultation with staff, elected members, trade unions, service users and other relevant stakeholders, and this analysis has been tested during the consultation.</p> <p>Following the formal consultation period, the report now addresses the key issues. The report sets out a summary of the key consultation issues raised by staff, trade unions, service users and the public and the response from management.</p>
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Families are assured that a range of providers in the area will continue to provide services and activity, provided or funded by the local authority, that is culturally sensitive and relevant to the needs of Bolton's diverse communities.

There are currently 47 childcare and early education providers within the three wards identified as the current catchment area for the nursery. There is a surplus of childcare places across Bolton currently for all children eligible for early years free entitlement provision, including the most vulnerable children who are eligible to access 2 year old funding. It is not anticipated that the overall number of childcare places for eligible 2 year olds, 3 and 4 year olds in the area served by the nursery will be reduced to an inadequate level by this proposal but availability of provision in this area will continue to be monitored.

No other viable options have been identified via the consultation process or review of the nursery which would allow for delivery of a balanced budget.

In the specific case of this proposal, it is believed that there will be no adverse impact on children and families in relation to race.

The potential reduction in staff posts will be managed and supported in line with the council's restructure, redundancy, and redeployment policy framework.

The most recent information (July 2021) suggests there are vacant childcare and early years education places across all age groups, in excess of the places currently provided at Harvey Nursery. The proposed closure of Harvey Nursery should not result in a significant negative impact on childcare places for families within the local community. Nonetheless, provision will continue to be monitored in the area and new providers will be encouraged into the market if the number and quality of provision available becomes a concern

It is recognised that individual children and families attending Harvey nursery may experience some disruption as alternative provision is sought and transitioned to. If the decision is taken to close the nursery the Family Information Service (FIS) will support parents to secure places in alternative provision. It is also proposed that the nursery provision be continued to 31st August 2022 for those children who will be moving to primary schools in September 2022.

<p>Religion or belief (this includes any religion with a clear structure and belief system. Belief means any religious or philosophical belief. The Act also covers lack of religion or belief)</p>	<p>No differential impact is anticipated on grounds of religion or belief.</p>	<p>See comments under Race.</p>	<p>See comments under Race.</p>
<p>Disability (a person is disabled if they have a physical or mental impairment which has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities)</p>	<p>Whilst any concern that families might feel about moving from local authority provision which has a sound track record in providing inclusive services is acknowledged, families are reminded that early years' providers have duties under the Equality Act 2010. In particular, they must not discriminate against, harass or victimise disabled children, and they must make reasonable adjustments, including the provision of auxiliary aids and services for disabled children, to prevent them being put at substantial disadvantage. In consequence, no differential impact is anticipated on the grounds of disability.</p> <p>During consultation, some parents and carers of children with SEND raised concerns about transition and finding appropriate provision to meet their needs.</p>	<p>See comments under Race.</p>	<p>See comments under Race.</p> <p>It is noted that the nursery does not specialise in SEND support. Many other local providers will be able to facilitate a similar offer as part of their Ofsted registration requirement. If the decision is taken to close the nursery, the Family Information Service will support parents and carers to access inclusive provision to meet their child's or children's needs.</p>
<p>Sex / Gender</p>	<p>No differential impact is anticipated on the grounds of sex / gender.</p>	<p>See comments under Race.</p>	<p>See comments under Race.</p>

<p>Gender reassignment / Gender identity (a person who's deeply felt and individual experience of gender may not correspond to the sex assigned to them at birth, they may or may not propose to, start or complete a process to change their gender. A person does not need to be under medical supervision to be protected)</p>	<p>No differential impact is anticipated on the grounds of gender reassignment / gender identity.</p>	<p>See comments under Race.</p>	<p>See comments under Race.</p>
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<p>Age (people of all ages)</p>	<p>Whilst it is acknowledged that this proposal would remove provision for children aged under 5 years old, it is not anticipated that this removal will in itself present a differential impact on the grounds of age as there is sufficiency in the childcare market in the area.</p> <p>There are currently 47 childcare and early education providers within the three wards identified as the current catchment area for the nursey. There is a surplus of childcare places across Bolton currently for all children eligible for early years free entitlement provision, including the most vulnerable children who are eligible to access 2 year old funding. It is not anticipated that the overall number of childcare places for eligible 2 year olds, 3 and 4 year olds in the area served by the nursery will be reduced to an inadequate level by this proposal but availability of provision in this area will continue to be monitored.</p> <p>Concerns were raised during consultation, about the transitional impact on children. Specific concerns were raised relating to transition for children starting school in September 2022.</p>	<p>See comments under Race</p>	<p>See comments under Race</p> <p>In order to avoid an additional transition for children starting school in September and to support working parents/carers who will still require childcare through the summer holiday it is proposed that the nursery provision be continued to 31st August 2022 for those children who will be moving to primary school in September 2022.</p> <p>The Families Information Service will support parents and carers in accessing provision to meet their child's or children's needs.</p>
<p>Sexual orientation - people who are lesbian, gay and bisexual.</p>	<p>No differential impact is anticipated on the grounds of sexual orientation.</p>	<p>See comments under Race.</p>	<p>See comments under Race.</p>

Marriage and civil partnership (Only in relation to due regard to the need to eliminate discrimination)	No differential impact is anticipated on the grounds of marriage and civil partnership.	See comments under Race.	See comments under Race.
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<p>Caring status (including pregnancy & maternity)</p>	<p>Whilst it is acknowledged that this proposal would remove provision for children aged under 5 years old, it is not anticipated that this removal will in itself present a differential impact on the grounds for parents and carers on the grounds of caring status.</p> <p>There are currently 47 childcare and early education providers within the three wards identified as the current catchment area for the nursey. There is a surplus of childcare places across Bolton currently for all children eligible for early years free entitlement provision, including the most vulnerable children who are eligible to access 2 year old funding. It is not anticipated that the overall number of childcare places for eligible 2 year olds, 3 and 4 year olds in the area served by the nursery will be reduced to an inadequate level by this proposal but availability of provision in this area will continue to be monitored.</p> <p>Survey respondents raised concerns about finding comparable provision in the same locality and that the closure would affect parent/carers wellbeing.</p> <p>Concerns were raised relating to support for parents/carers who will still require childcare through the summer holiday.</p>	<p>See comments under Race.</p>	<p>See comments under Race.</p> <p>If the decision is taken to close the nursery the Families Information Service will support parents to access Ofsted registered provision in the area. More details of other early years providers in the surrounding area can be found in Appendix 1 of the report, many of which have spare capacity.</p> <p>In order to support working parents / carers who will still require childcare through the summer holiday and to avoid an additional transition for children starting school in September it is proposed that the nursery provision be continued to 31st August 2022 for those children who will be moving to primary school in September 2022.</p>
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<p>Socio-economic</p>	<p>In July 2021 the data suggests the number of the pupils attending Harvey Nursery who are eligible for Early Years Pupil Premium has fallen.</p> <p>This, in itself, does not raise concerns regarding significant differential impact on socio-economic grounds as families are assured that a range of providers in the area will continue to make childcare available to families who receive support through the scheme which provides free early education and childcare to eligible children.</p> <p>There are currently 47 childcare and early education providers within the three wards identified as the current catchment area for the nursey. There is a surplus of childcare places across Bolton currently for all children eligible for early years free entitlement provision, including the most vulnerable children who are eligible to access 2 year old funding. It is not anticipated that the overall number of childcare places for eligible 2 year olds, 3 and 4 year olds in the area served by the nursery will be reduced to an inadequate level by this proposal but availability of provision in this area will continue to be monitored.</p> <p>Survey respondents raised concerns about the transitional impact on children, and any negative financial impact, due to a perception that Harvey Nursery fees are subsidised.</p>	<p>See comments under Race</p>	<p>See comments under Race.</p> <p>It is noted that the current costs at Harvey Nursery are slightly below regional average and in line with other local providers. The hourly rate for children under 2 is £4.49, compared with an average of £4.64 across the Northwest. For children over the age of two the hourly rate is £4.28, compared with an average of £4.44 across the Northwest. There are various schemes available for assistance with childcare costs. If the decision is taken to close the nursery the Families information service will ensure that parents/carers are supported to access all financial support they are entitled to.</p>
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Other comments or issues.	The feedback from consultation with staff, elected members, trade unions, service users and other relevant stakeholders contained within this report and within appendices, have been considered to inform this Equality Impact Assessment.
Please provide a list of the evidence used to inform this EIA, such as the results of consultation or other engagement, service take-up, service monitoring, surveys, stakeholder comments and complaints where appropriate.	The feedback from consultation with staff, elected members, trade unions, service users and other relevant stakeholders contained within this report and within appendices, have been considered to inform this Equality Impact Assessment.

Impacts on Staff

Consider:

- How to avoid, reduce or minimise negative impact (if you identify unlawful discrimination, including victimisation and harassment, you must stop the action and take advice immediately).
- How to **advance equality of opportunity**. This means considering the need to:
 - Remove or minimise disadvantages suffered by people with protected characteristics due to having that characteristic.
 - Take steps to meet the needs of people with protected characteristics that are different from people who do not have that characteristic
 - Encourage protected groups to participate in public life and in any other activity where participation is disproportionately low
- How to **foster good relations**. This means considering the need to:
 - Tackle prejudice; and
 - promote understanding between people who share a protected characteristic and others.

	<p>Is there any potential for (positive or negative) differential impact? Could this lead to adverse impact and if so what?</p>	<p>Can this adverse impact be justified on the grounds of promoting equality of opportunity for one group, or for any other reason? Please state why</p>	<p>Please detail what actions you will take to remedy any identified adverse impact i.e. actions to eliminate discrimination, advance equality of opportunity and foster good relations</p>
<p>Race (this includes ethnic or national origins, colour or nationality, and caste, and includes refugees and migrants; and gypsies and travellers)</p>	<p>No differential impact is anticipated on the grounds of race.</p>	<p>With regard to all the groups identified in this assessment, it should be noted that this proposal is driven by the need to reduce budgetary pressure on the Council budget.</p>	<p>These proposals have been subject to consultation with staff, elected members, trade unions, service users and other relevant stakeholders, and this analysis has been tested during the consultation.</p> <p>Following the formal consultation period, the report now addresses the key issues. The report sets out a summary of the key consultation issues raised by staff, trade unions, service users and the public and the</p>

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			<p>response from management.</p> <p>The potential reduction in staff posts will be managed and supported in line with the council's restructure, redundancy, and redeployment policy framework.</p> <p>Should the proposal close the nursery be approved, any member of staff who wish to remain with the council, would be supported to try to secure alternative employment within the council via the redeployment process. Since consultation began, and continuing, details of all advertised posts within the council have been shared with all the nursery staff, and they have been given priority access to the posts in line with council policy.</p>
<p>Religion or belief (this includes any religion with a clear structure and belief system. Belief means any religious or philosophical belief. The Act also covers lack of religion or belief)</p>	<p>No differential impact is anticipated on the grounds of religion or belief.</p>	<p>With regard to all the groups identified in this assessment, it should be noted that this proposal is driven by the need to reduce budgetary pressure on the Council budget.</p>	<p>See comments under Race.</p>
<p>Disability (a person is disabled if they have a physical or mental impairment which has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities)</p>	<p>No differential impact is anticipated on the grounds of disability.</p>	<p>With regard to all the groups identified in this assessment, it should be noted that this proposal is driven by the need to reduce budgetary pressure on the Council budget.</p>	<p>See comments under Race.</p>

<p>Sex / Gender</p>	<p>There is a potential differential impact for female members of staff, as a high proportion of the affected staff cohort are women. Early years services in England are predominantly, although not exclusively, staffed by women. Any impacts of the proposal in reduction of staff could therefore have a negative impact on women because they form the greatest proportion of the workforce.</p>	<p>With regard to all the groups identified in this assessment, it should be noted that this proposal is driven by the need to reduce budgetary pressure on the Council budget.</p> <p>In line with generalised trends of employment within the directorate there are more women affected by these proposals.</p> <p>The gender balance in the early years sector results from wider social and historic issues and is not unique to Bolton or the UK. DfE data on the current children's social care workforce points to the high proportion of women working in children's social care across England.</p>	<p>See comments under Race.</p>
<p>Gender reassignment / Gender identity (a person who's deeply felt and individual experience of gender may not correspond to the sex assigned to them at birth, they may or may not propose to, start or complete a process to change their gender. A person does not need to be under medical supervision to be protected)</p>	<p>No differential impact is anticipated on the grounds of gender reassignment/gender identity.</p>	<p>With regard to all the groups identified in this assessment, it should be noted that this proposal is driven by the need to reduce budgetary pressure on the Council budget.</p>	<p>See comments under Race.</p>

<p>Age (people of all ages)</p>	<p>No differential impact is anticipated on the grounds of age. No age group predominates in the staffing cohort of the nursery and so staff across the age spectrum will be impacted equally by the closure of the provision.</p>	<p>With regard to all the groups identified in this assessment, it should be noted that this proposal is driven by the need to reduce budgetary pressure on the Council budget.</p>	<p>See comments under Race.</p>
<p>Sexual orientation - people who are lesbian, gay and bisexual.</p>	<p>No differential impact is anticipated on the grounds of sexual orientation.</p>	<p>With regard to all the groups identified in this assessment, it should be noted that this proposal is driven by the need to reduce budgetary pressure on the Council budget.</p>	<p>See comments under Race.</p>
<p>Marriage and civil partnership (Only in relation to due regard to the need to eliminate discrimination)</p>	<p>No differential impact is anticipated on the grounds of marriage and civil partnership.</p>	<p>With regard to all the groups identified in this assessment, it should be noted that this proposal is driven by the need to reduce budgetary pressure on the Council budget.</p>	<p>See comments under Race.</p>
<p>Caring status (including pregnancy & maternity)</p>	<p>Early years and childcare services in England are predominantly, although not exclusively, staffed by women, who in turn are more likely to, but not exclusively, have a caring status. Therefore, because they form the greatest proportion of the workforce, any impacts of the proposal could therefore have a</p>	<p>With regard to all the groups identified in this assessment, it should be noted that this proposal is driven by the need to reduce budgetary pressure on the Council budget.</p>	<p>See comments under Race.</p>

	negative effect on people with a caring status.		
Socio-economic	A notable proportion of the posts affected are at Grade D or below. As a result, the impact of the proposal will be felt by lower paid workers.	With regard to all the groups identified in this assessment, it should be noted that this proposal is driven by the need to reduce budgetary pressure on the Council Budget.	See comments under Race.
Other comments or issues.	<p>The feedback from consultation with staff, elected members, trade unions, service users and other relevant stakeholders contained within this report and within appendices, have been considered to inform this Equality Impact Assessment.</p> <p>The potential reduction in staff posts will be managed and supported in line with the council's restructure, redundancy and redeployment policy framework. Any reduction in the workforce may lead to a potential reduction in its diversification, however this will be through following the appropriate procedures and not the discrimination of particular members of staff based on any other criterion except that stated in the redundancy policy.</p> <p>The implications of the review will be monitored as part of the Council's wider diversity monitoring of its savings and efficiencies programme and all decisions will be taken in accordance with the Council's existing policies.</p>		
Please provide a list of the evidence used to inform this EIA, such as the results of consultation or other engagement, service take-up, service monitoring, surveys, stakeholder comments and complaints where appropriate.	<p>The feedback from consultation with staff, elected members, trade unions, service users and other relevant stakeholders contained within this report and within appendices, have been considered to inform this Equality Impact Assessment.</p>		

This EIA form and report has been checked and countersigned by the Directorate Equalities Officer before proceeding to Executive Cabinet Member(s)

Please confirm the outcome of this EIA:

No major impact identified, therefore no major changes required – proceed	<input type="checkbox"/>
Adjustments to remove barriers / promote equality (mitigate impact) have been identified – proceed	<input checked="" type="checkbox"/>
Positive impact for one or more groups justified on the grounds of promoting equality - proceed	<input type="checkbox"/>
Continue despite having identified potential for adverse impact/missed opportunities for promoting equality – this requires a strong justification	<input type="checkbox"/>
The EIA identifies actual or potential unlawful discrimination - stop and rethink	<input type="checkbox"/>

Contact Officer

Name: Helen Shearer

Date: 31/10/2021

Directorate Equalities Lead Officer

Name: Rachael Storey

Date: 29/10/2021