



Llywodraeth Cymru  
Welsh Government

# Autistic Spectrum Disorder Strategic Action Plan

## Equality Impact Assessment

## Equality Impact Assessment (EIA) Template – Part 1

<b>Policy title and purpose (brief outline):</b>	<b>Refreshed Autistic Spectrum Disorder – Strategic Action Plan</b>
<b>Name of official:</b>	<b>Julie Annetts</b>
<b>Department:</b>	<b>Health and Social Services</b>
<b>Date:</b>	<b>9<sup>th</sup> January 2015, reviewed January 2016 and August 2016</b>
<b>Signature:</b>	

**1. Please provide a brief description of the policy/decision.**

**For example what is the overall objective of the policy/decision, what are the stated aims (including who the intended beneficiaries are), a broad description of how this will be achieved, what the measure of success will be, and the time frame for achieving this?**

The first Autistic Spectrum Disorder Strategic Action Plan (ASD SAP) was published in 2008. Its aim was to improve services and support for people of all ages who have ASD. We have refreshed the ASD SAP to give renewed focus on priorities of action identified by our stakeholders, particularly people with ASD and their families and carers. In May 2015 an interim Delivery Plan was published to enable the development of services and scoping for an integrated service for Wales.

In January 2016 Ministers agreed to support the development of a National Integrated Autism Service for Wales (IAS), funded through the Intermediate Care Fund. The implementation of the IAS commenced across health board region in April 2016 and will be completed by March 2019.

Between March and May 2016 a 12 week consultation was held on the draft refreshed ASD SAP. The consultation responses have been considered and analysed to identify whether there are issues which could impact on protected groups.

**2. We have a legal duty to engage with people with protected characteristics under the Equality Act 2010 (please refer to Annex A of the EIA guidance) identified as being relevant to the policy. What steps have you taken to engage with stakeholders, both internally and externally?**

Three large stakeholder engagement events were held in November 2012, to enable people with autism to provide feedback on their priorities for future action. At this event stakeholders were asked to provide feedback priorities for future action. There were no comments that were relevant to preventing discrimination or promoting equality for the protected groups in the feedback received. Although the stakeholders did refer to the need to continue to prioritise support for adults and to assist young people in their transition from full time education.

Two meetings were also held with parent groups during 2013, the issue of transition into adulthood was raised as a concern. In September 2013 an ASD Stakeholder Advisory Group was established to provide expert advice on the development of the refreshed ASD SAP, eight meetings have been held.

Members include representatives from Welsh Government, local authorities and health bodies, the voluntary sector and service users. We have also sought representative from Fairer Futures Division to make sure equality of opportunity is considered by stakeholders as part of the development of the refreshed action plan.

Officials have attended National ASD Learning Improvement Network meetings, which bring together ASD leads in each local authority area. Regular meetings and engagement is also on-going with the ASD National Co-ordinator who provides advice and guidance for regional ASD leads, who provide advice and support on autism within local authorities, equality issues have not been raised through this engagement.

During the summer of 2015 further consultation was undertaken with stakeholders, including workshops and on-line surveys, there were over 1000 responses. The feedback did not include any references to the impact on autism on groups with protected characteristics, other than disability.

Within Welsh Government we have established collaborative relationships with relevant policy areas including in the Department of Education and Skills and the Department of Economy, Science and Transport regarding additional, learning needs, employment and skills.

The draft refreshed ASD SAP was published for a twelve week consultation in March 2016. As part of the consultation officials visited a range of stakeholder groups, which included people with ASD and their parents and carers. 76 written responses to the consultation were received, 30 from individuals and 46 from a range of professional groups and third sector organisations. The analysis of the responses included considering the impact on individuals from protected groups. Several responses highlighted the specific needs of girls with autism, looked after children and the need to explore awareness and provision for individuals from minority ethnic groups. Two responses were received in Welsh and highlighted the need to provided services and support in the medium of Welsh.

**3. Your decisions must be based on robust evidence. What evidence base have you used? Please list the source of this evidence e.g. National Survey for Wales. Do you consider the evidence to be strong, satisfactory or weak and are there any gaps in evidence?**

We have a strong relationship with the Wales Autism Research Centre (WARC) based at Cardiff University, the Chair in Autism; Professor Sue Leekam is a member of the ASD Advisory Group. We have also commissioned an independent evaluation of the ASD SAP which has included a focussed literature review on the impact of the ASD SAP in Wales. The interim report was provided in July 2013, the full evaluation was published in February 2016. This evaluation did not draw out any issues regarding the impact of autism or service provision on protected groups.

As part of the implementation of the first ASD SAP we commissioned research to strengthen the evidence base for interventions. This has included a review of children's diagnostic services in 2010 and a review of the circumstances of older people with autism in 2009.

We have also drawn evidence from relevant guidance by the National Institute for Care Excellence (NICE) on the referral, identification and diagnosis of children with autism and the parallel guidance published for adults. NICE is recognised for their expertise in providing evidence based advice and guidance on clinical issues.

There were identified gaps in evidence, particularly around the effectiveness of the interventions that are designed to support children and adults with autism. For example the benefits of some therapeutic services. During 2015 we commissioned the Welsh Local Government Association to undertake a series of reviews into current practice within Wales for both children and adults diagnosis. A scoping exercise was undertaken to examine examples of integrated autism services across Wales. This included a visit by officials to the One Stop Shop model in Scotland. The Minister was provided with a series of options for an integrated service, a fully integrated model was agreed and implementation of the service commenced in April 2016.

In early 2015 a Ministerial Task and Finish Group was established to consider the concerns relating to assessment and diagnosis for children, young people and adults. In May 2015 Ministers separately announced £2million recurring funding to support improvements in children's neurodevelopmental services. An assessment and diagnostic pathway has been agreed across health boards.

The task and finish group continued to discuss adults diagnosis and completed their report in March 2016. Ministers have agreed to support the development of a National Integrated Service and this will include improvements to diagnostic services for adults. It will also include low level community support for adults with autism who may not be eligible for social care, but nonetheless have support requirements.

We consider the overall evidence base to be strong and we continue to receive excellent advice on the evidence base for autism interventions from WARC and other experts in the field. The feedback from the consultation highlighted parents concerns about the potential different impacts of autism on girls and how this has an impact on identification and diagnosis, this will be fed back to diagnostic clinicians

across Wales who are members of the Together for Children and Young People Programme, neurodevelopmental steering group.

The consultation did not draw out specific issues around the impact of autism in minority ethnic groups. There is limited evidence about the impact of autism on different ethnic and religious group, for example to understand cultural attitudes about autism. Further work could usefully be undertaken in this area.

***It is important to note any opportunities you have identified that could advance or promote equality.***

**Impact**

**Please complete the next section to show how this policy / decision / practice could have an impact (positive or negative) on the protected groups under the Equality Act 2010 (refer to the EIA guidance document for more information).**

**Lack of evidence is not a reason for *not* progressing to carrying out an EIA. Please highlight any gaps in evidence that you have identified and explain how/if you intend to fill these gaps.**

**4.1 Do you think this policy / decision / practice will have a positive or negative impact on people because of their age?**

<b>Age</b>	<b>Positive</b>	<b>Negative</b>	<b>None / Negligible</b>	<b>Reasons for your decision (including evidence) / How might it impact?</b>
Younger people  <i>(Children and young people, up to 18)</i>	X			Stakeholder feedback highlighted deficiencies in assessment and diagnostic services. The Welsh Government is investing £2m in improving diagnostic services across health boards. The Welsh Government is also undertaking the reform of

				<p>Additional Learning Needs and this will include the impact on children, particularly regarding transition.</p> <p>The new Big Lottery Getting Ahead programme will focus employment support on young people with learning disabilities and autism.</p>
People 18-50	x			<p>The first ASD SAP identified the need to improve support for adults with autism. Stakeholders agree this is a continuing priority. A new National Integrated Autism Service is being rolled out from April 2016 and will include supporting adults with autism through assessment and diagnosis and post diagnostic support. The refreshed ASD SAP also considers the need to improve employment and support.</p>
Older people (50+)	x			<p>In 2009 we commissioned research into the outcomes and circumstances of older people with autism. As a result we have a better understanding of support needs in this group which have to be balanced against other competing priorities which stakeholders have identified as being more pressing. We have introduced more support for adults with Asperger's Syndrome and High</p>

				Functioning Autism.
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## 4.2 Because they are disabled?

Impairment	Positive	Negative	None / Negligible	Reason for your decision (including evidence) / How might it impact?
Visual impairment	x			<p>The ASD SAP considers co-existing neurodevelopmental, physical and sensory disabilities which may be more prevalent amongst people with ASD.</p> <p>People with ASD do not have a single set of traits or symptoms and support must be tailored to individual needs.</p>
Hearing impairment	x			As above
Physically disabled	x			As above
Learning disability	x			Evidence shows that over 40% of people on the ASD spectrum may have a co-existing learning disability and this is recognised in the ASD SAP, which highlights the need to tailor support services to individual requirements.
Mental health problem	x			Evidence suggests that there are high levels of depression and anxiety amongst people with ASD, particularly those who are high functioning.



				The Integrated autism service will provide low level support for adults with autism, which will help to reduce mental health problems.
Other impairments issues	x			Some people with ASD can have behaviour that challenges, which can limit their inclusion in wider society. We will consider this in relation to the interventions that should be available to support them and their families and carers. Advice on Positive Behavioural Support has been provided by the Welsh Government's Learning Disability Advisory Group, there are plans to publish guidance for service providers.

### 4.3 Because of their gender (man or woman)?

Gender	Positive	Negative	None / Negligible	Reason for your decision (including evidence)/ How might it impact?
Male			x	Evidence suggests that males can be up to four times more likely to be diagnosed with autism. The reasons for this are varied, but may be linked to studies which show that females are more able to mask ASD symptoms through mirroring behaviour etc. The differential impact of autism in girls has been

				raised as a concern and this is well known amongst clinicians.
Female			x	As above.

#### 4.4 Because they are transgender?

Transgender	Positive	Negative	None / Negligible	Reason for your decision (including evidence) / How might it impact?
			x	There is a lack of evidence to show how the presence of autism can impact on people who are transgender.

#### 4.5 Because of their marriage or civil partnership?

Marriage and Civil Partnership	Positive	Negative	None / Negligible	Reason for your decision (including evidence)/ How might it impact?
Marriage			x	There is a lack of evidence to suggest whether marriage or civil partnership will be impacted by the ASD SAP.
Civil Partnership			x	As above.

#### 4.6 Because of their pregnancy or maternity?

Pregnancy and Maternity	Positive	Negative	None / Negligible	Reason for your decision (including evidence) / How might it impact?
Pregnancy	<b>X</b>			<p>Autistic women who are pregnant could experience difficulties with maternity services which may not understand the impact of autism.</p> <p>Also there is some research which suggests that autism could be caused by environmental factors during the mother's pregnancy.</p> <p>The ASD SAP priorities for action will include improvements to training for professionals; this will include health care professionals.</p> <p>The implementation of the IAS includes training in diagnostic tools for clinicians.</p> <p>This is an area where more analysis should be considered in the future.</p>
Maternity (the period after birth)			<b>x</b>	As above.

#### 4.7 Because of their race?

Race	Positive	Negative	None / Negligible	Reason for your decision (including evidence) / How might it impact?
Ethnic minority people e.g. Asian, Black,			x	A 2007 report by the National Autistic Society highlighted the lack of research into autism and ethnicity. There is little evidence to suggest there will be a significant differential impact in relation to ethnic background, in addition to the impact experienced related to ethnicity. This may be an area for potential further work.
National Origin (e.g. Welsh, English)	x			Evidence collected through the previous ASD SAP identified that there was a potential problem in that ASD clinical diagnostic tools were not available in Welsh. The National Integrated Autism Service will consider the need to ensure that diagnosis is available in Welsh, including the development of diagnostic tools.
Asylum Seeker and Refugees			x	There is a lack of evidence to suggest that the ASD SAP would have a positive or negative effect on Asylum Seekers or refugees.
Gypsies and Travellers			x	There is a lack of evidence to suggest that the ASD SAP would have a positive or negative effect on Gypsies and Travellers. This is an area which further work

				could be explored.
Migrants			x	There is a lack of evidence to suggest that the ASD SAP would have a positive or negative impact on migrants.
Others				

#### 4.8 Because of their religion and belief or non-belief?

Religion and belief or non – belief	Positive	Negative	None / Negligible	Reason for your decision (including evidence)/ How might it impact?
Different religious groups including Muslims, Jews, Christians, Sikhs, Buddhists, Hindus, Others (please specify)			x	There is no evidence to suggest that the ASD SAP would have a positive or negative impact on individuals because of their religion or belief or lack of belief. Stakeholders have not identified that this should be an area for future research, although it may be worthy of further exploration.
Belief e.g. Humanists			x	As above
Non-belief			x	As above

#### 4.9 Because of their sexual orientation?

Sexual Orientation	Positive	Negative	None / Negligible	Reason for your decision (including evidence)/ How might it impact?
Gay men			x	There is no evidence to suggest that the ASD SAP would have a positive or negative impact on people in relation to their sexual orientation.
Lesbians			x	As above
Bi-sexual			x	As above

**4.10 Do you think that this policy will have a positive or negative impact on people’s human rights? Please refer to point 1.4 of the EIA Annex A - Guidance for further information about Human Rights.**

Human Rights	Positive	Negative	None / Negligible	Reason for your decision (including evidence) / How might it impact?
Human Rights including Human Rights Act and UN Conventions			x	The refreshed action plan will take a human rights approach and be based upon the FREDA principles of Fairness, Respect, Equality, Dignity and Autonomy.

***If you have identified any impacts (other than negligible ones), positive or negative, on any group with protected characteristics, please complete Part 2.***

***Only if there are no or negligible positive or negative impacts should you go straight to part 2 and sign off the EIA.***

## **Equality Impact Assessment – Part 2**

**1. Building on the evidence you gathered and considered in Part 1, please consider the following:**

### **1.1 How could, or does, the policy help advance / promote equality of opportunity?**

For example, positive measures designed to address disadvantage and reach different communities or protected groups?

Measures already taken to improve services for adults with autism will promote equality of opportunity. We are also planning to improve service provision for children and young people with autism through the IAS.

Work being undertaken to improve diagnostic services for adults and children will take into account the need for translation of diagnostic tools into the Welsh language. The Welsh Government ensures that public sector guidance on autism is available bilingually.

### **1.2 How could / does the policy / decision help to eliminate unlawful discrimination, harassment or victimisation?**

The ASD SAP is not aimed at preventing discrimination, harassment or victimisation of people with protected characteristics. Work to support people with ASD, especially those with high functioning autism or Asperger's syndrome may indirectly help with discrimination, harassment or victimisation that some people may experience because of their limited social communication skills. Alongside this will be the work we are promoting to raise awareness of the specific needs of people with autism, particularly in the workplace and other public settings such as hospitals etc.

### **1.3 How could/does the policy impact on advancing / promoting good relations and wider community cohesion?**

The ASD SAP will continue to provide support for adults with Asperger's syndrome high functioning autism. It is well recognised that people with autism have problems with social communication and can experience stress and anxiety in establishing and maintaining social relationships. The added support the service provides can include support with social skills and to assist individuals in coping with everyday life. Wider awareness amongst the community will also help others including employers understand the difficulties experienced by people with autism and the need to make adjustments to accommodate their needs.

## **2. Strengthening the policy**

**2.1 If the policy is likely to have a negative effect ('adverse impact') on any of the protected groups or good relations, what are the reasons for this?**

**What practical changes/actions could help reduce or remove any negative impacts identified in Part 1?**

There is no evidence or feedback to suggest that the ASD SAP will have an adverse impact on protected groups or good relations.

**2.2 If no action is to be taken to remove or mitigate negative / adverse impact, please justify why.**

**(Please remember that if you have identified unlawful discrimination (immediate or potential) as a result of the policy, the policy must be changed or revised.)**



### 3. Monitoring, evaluating and reviewing

#### How will you monitor the impact and effectiveness of the policy?

List details of any follow-up work that will be undertaken in relation to the policy (e.g. consultations, specific monitoring etc).

The draft ASD SAP was published for consultation in March 2016 and the feedback we receive will be reflected in the final document.

We will establish a Delivery Plan which will set out the actions we are taking to support people with ASD through the implementation of the ASD SAP priorities.

We will establish an ASD Implementation Group to oversee and provide advice on the implementation of the ASD SAP Delivery Plan. Membership will include statutory services, the voluntary sector and people with autism and their parents and carers.

We will commission an evaluation of the refreshed ASD SAP prior to publishing the ASD SAP to ensure that a measurement framework is established which will include monitoring the impact of the ASD SAP on people with protected characteristics. The evaluation will be guided by the ASD Implementation Group.

The results of all impact assessments where the impact is significant will be published on the Welsh Government's website.

### 4. Declaration

**\*Please delete as appropriate:**

**The policy \*does / does not have a significant impact upon equality issues**

**Official completing the EIA**

Name: Julie Annetts
Department: Health and Social Services
Date:
Signature:
<b>Head of Division (Sign-off)</b>
Name: Lisa Dunsford
Job title and department: Deputy Director Delivering Policy for Children and Adults Division
Date:
Signature:
Review Date:

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