



# Equality Impact Assessment

## Project or Service Template

Name of the proposal, project or service
Proposal to change the way care and support is commissioned at Newington Court Extra Care scheme in Ticehurst

File ref:		Issue No:	
Date of Issue:		Review date:	

### Contents

Part 1 – The Public Sector Equality Duty and Equality Impact Assessments (EIA)...	2
Part 2 – Aims and implementation of the proposal, project or service .....	4
Part 3 – Methodology, consultation, data and research used to determine impact on protected characteristics. ....	7
Part 4 – Assessment of impact.....	12
Part 5 – Conclusions and recommendations for decision makers .....	29
Part 6 – Equality impact assessment action plan .....	31

## **Part 1 – The Public Sector Equality Duty and Equality Impact Assessments (EIA)**

**1.1** The Council must have due regard to its Public Sector Equality Duty when making all decisions at member and officer level. An EIA is the best method by which the Council can determine the impact of a proposal on equalities, particularly for major decisions. However, the level of analysis should be proportionate to the relevance of the duty to the service or decision.

**1.2 This is one of two forms that the County Council uses for Equality Impact Assessments, both of which are available on the intranet. This form is designed for any proposal, project or service. The other form looks at services or projects.**

### **1.3 The Public Sector Equality Duty (PSED)**

The public sector duty is set out at Section 149 of the Equality Act 2010. It requires the Council, when exercising its functions, to have “due regard” to the need to

- Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited under the Act.
- Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- Foster good relations between persons who share a relevant protected characteristic and persons who do not share it. (see below for “protected characteristics”)

These are sometimes called equality aims.

### **1.4 A “protected characteristic” is defined in the Act as:**

- age;
- disability;
- gender reassignment;
- pregnancy and maternity;
- race (including ethnic or national origins, colour or nationality)
- religion or belief;
- sex;
- sexual orientation.

Marriage and civil partnership are also a protected characteristic for the purposes of the duty to eliminate discrimination.

The previous public sector equalities duties only covered race, disability and gender.

### **1.5 East Sussex County Council also considers the following additional groups/factors when carry out analysis:**

- Carers – A carer spends a significant proportion of their life providing unpaid support to family or potentially friends. This could be caring for a relative, partner or friend who is ill, frail, disabled or has mental health or substance misuse problems. [Carers at the Heart of 21stCentury Families and Communities, 2008]
- Literacy/Numeracy Skills
- Part time workers
- Rurality

### **1.6 Advancing equality (the second of the equality aims) involves:**

- Removing or minimising disadvantages suffered by people due to their protected characteristic
- Taking steps to meet the needs of people from protected groups where these are different from the needs of other people including steps to take account of disabled people's disabilities
- Encouraging people from protected groups to participate in public life or in other activities where their participation is disproportionately low

NB Please note that, for disabled persons, the Council must have regard to the possible need for steps that amount to positive discrimination, to "level the playing field" with non-disabled persons, e.g. in accessing services through dedicated car parking spaces.

## **1.6 Guidance on Compliance with The Public Sector Equality Duty (PSED) for officers and decision makers:**

1.6.1 To comply with the duty, the Council must have "due regard" to the three equality aims set out above. This means the PSED must be considered as a factor to consider alongside other relevant factors such as budgetary, economic and practical factors.

1.6.2 What regard is "due" in any given case will depend on the circumstances. A proposal which, if implemented, would have particularly negative or widespread effects on (say) women, or the elderly, or people of a particular ethnic group would require officers and members to give considerable regard to the equalities aims. A proposal which had limited differential or discriminatory effect will probably require less regard.

1.6.3 *Some key points to note :*

- The duty is regarded by the Courts as being very important.
- Officers and members must be aware of the duty and give it conscious consideration: e.g. by considering open-mindedly the EIA and its findings when making a decision. When members are taking a decision, this duty can't be delegated by the members, e.g. to an officer.
- EIAs must be evidence based.
- There must be an assessment of the practical impact of decisions on equalities, measures to avoid or mitigate negative impact and their effectiveness.
- There must be compliance with the duty when proposals are being formulated by officers and by members in taking decisions: the Council can't rely on an EIA produced after the decision is made.
- The duty is ongoing: EIA's should be developed over time and there should be evidence of monitoring impact after the decision.
- The duty is not, however, to achieve the three equality aims but to consider them – the duty does not stop tough decisions sometimes being made.
- The decision maker may take into account other countervailing (i.e. opposing) factors that may objectively justify taking a decision which has negative impact on equalities (for instance, cost factors)

1.6.4 In addition to the Act, the Council is required to comply with any statutory Code of Practice issued by the Equality and Human Rights Commission. New Codes of Practice under the new Act have yet to be published. However, Codes of Practice issued under the previous legislation remain relevant and the Equality and Human Rights Commission has also published guidance on the new public sector equality duty.

## **Part 2 – Aims and implementation of the proposal, project or service**

### **2.1 What is being assessed?**

#### **a) Proposal or name of the project or service**

Proposal to change the way care and support is commissioned at Newington Court Extra Care scheme in Ticehurst

#### **b) What is the main purpose or aims of proposal, project or service?**

To consider the way care is commissioned at Newington Court, potentially moving from an Extra Care to a Housing with Care model, subject to a decision by the Lead Member for Adult Social Care and Health. This change in model would remove the 24/7 onsite support, moving to a Home Care model of delivery. In addition, the Council would fund up to 7 weekly background hours for the first year to support transition to the new model.

The Council are considering a change to the model because:

- 50% of current residents have either zero or less than five care hours per week, and the minimum number of care hours required to justify the 24/7 on-site care and support has not been met for a consistent period of time
- ESCC pays 54 unused care hours per week, equating to £51,760 per annum
- ESCC also funds night cover at £64,078 per annum. Only one resident has a scheduled night call.
- Use of Tunstall at night has continued to be very minimal despite Covid-19
- 12 of 35 flats are void. There are no clients on the waiting list, despite significant promotion to teams to attract new referrals

The project includes a formal consultation, which ran from 10 November to 18 December 2020. All views gathered via the consultation will be shared with the Lead Member for Adult Social Care and Health on 26 January 2021 to support on decision on whether the change the model of care to 'Housing with Care' from November 2021, when the current extra care contract expires.

#### **c) Manager(s) and section or service responsible for completing the assessment**

Caroline Moyes, Project Manager, Adult Social Care & Health (ASCH)

Angela Yphantides, Strategic Commissioning Manager, ASCH

Emma Winter, Extra Care Co-ordinator, ASCH

### **2.2 Who is affected by the proposal, project or service? Who is it intended to benefit and how?**

- Residents and their carers at Newington Court
- Potential clients who are eligible for Extra Care service
- Optivo, Landlord
- Care at Home Services (CAHS)
- Rother District Council (RDC)
- Ticehurst Surgery

The project gives an opportunity to address issues relating to the current arrangements, giving potential benefits including:

- Exploring alternative care and support delivery at Newington Court
- Developing Newington Court into a vibrant Community Setting
- Increase demand at the other 6 Extra Care Schemes
- Additional housing options for older people on the RDC housing register.
- Service charge – completion of Housing Benefit financial re-assessment
- Support plans: review individual’s care and support needs and update support plans – ensuring the most appropriate level of care provision

**2.3 How is, or will, the proposal, project or service be put into practice and who is, or will be, responsible for it?**

If the proposal was agreed, the Council would:

- write to residents to let them know of the changes to the way care is commissioned
- Residents care needs would be reviewed from February 2021, when they would then have time to make a decision about what they wished to do next. The Council’s assessment team would be available to talk to people and their families about what the decision meant for them and look at their options. In some cases, this might include doing an assessment or review of their social care needs.
- The Council will continue to work closely with our partners Optivo, Care at Home and Rother District Council to transition to the new model of care from November 2021.
- Optivo would continue to be the landlord and residents would continue to have Assured Tenancies
- Care at Home would continue to provide residents’ care, but as a Home Care service, rather than a 24/7 onsite care service
- Rother District Council would be able to move in residents with no or low care needs to fill the voids at Newington Court, as the minimum care hour requirements would be removed
- The Council will work with residents and partners to determine how the additional 7 weekly background hours could be used to support current residents’ transition to the new model of care, for the first year of transition, and then review
- The Council would pay for any additional costs associated with the change to a new model of care for the first year of transition, and then review

**2.4 Are there any partners involved? E.g. NHS Trust, voluntary/community organisations, the private sector? If yes, how are partners involved?**

- Optivo, Housing Landlord – including onsite café arrangements
- Rother District Council
- Care at Home Services
- Ticehurst Surgery
- Courtyard Cafe
- ASC Neighbourhood Support Team (NST), Learning Disability Team, Mental Health Team - these teams work with people in the community who are eligible for Social Care services to promote and support independence at home, minimise risk and improve quality of life.

- Hospital Assessment and Care Management Teams - These teams work with people who have had a stay in hospital who are eligible for Social Care services to support their discharge to the community and return to living at home.
- Care Quality Commission (CQC): inspection and regulation ensuring compliance with national standards and regulations.

**2.5 Is this proposal, project or service affected by legislation, legislative change, service review or strategic planning activity?**

Strategic framework documents and legislation considered in this report include:

- Care Act 2014
- The Public Contracts Regulations 2015
- Equality Act 2010
- Mental capacity Act 2005
- Liberty Protection Safeguards
- Welfare Reform Act 2012
- The Localism Act 2011

**2.6 How do people access or how are people referred to your proposal, project or service? Please explain fully.**

- Currently, allocations are managed by the Council as part of our Extra Care model
- A change in model to 'Housing with Care' would transfer the allocations responsibility back to Optivo, who will work closely with Rother District Council to identify appropriate residents from the Rother Housing register via Homemove. This change is likely to identify a higher volume of potential residents for Newington Court, as the requirement to have a minimum number of care hours will be removed. It is anticipated that this change will be able to fill the high volume of voids at Newington Court, and return the scheme to a vibrant and thriving home for older people.

**2.7 If there is a referral method how are people assessed to use the proposal, project or service? Please explain fully.**

- As above in 2.6.

**2.8 How, when and where is your proposal, project or service provided? Please explain fully.**

- Care at Home are currently contracted to deliver the scheduled care hours to residents in Newington Court as part of the Council Extra Care contract. Optivo are the registered Landlord.
- Care at Home would continue to deliver scheduled care hours via a domiciliary care package as they are the lead home care provider for the Ticehurst area.
- Optivo will continue to provide their existing housing support service, with an onsite scheme manager.

- Out of hours emergency support will be accessible via a Lifeline / Tunstall system which is commissioned by Optivo.

### ***Part 3 – Methodology, consultation, data and research used to determine impact on protected characteristics.***

#### **3.1 List all examples of quantitative and qualitative data or any consultation information available that will enable the impact assessment to be undertaken.**

Types of evidence identified as relevant have <b>X</b> marked against them			
	Employee Monitoring Data		Staff Surveys
<b>x</b>	Service User Data	X	Contract/Supplier Monitoring Data
	Recent Local Consultations		Data from other agencies, e.g. Police, Health, Fire and Rescue Services, third sector
<b>x</b>	Complaints	X	Risk Assessments
<b>x</b>	Service User Surveys	X	Research Findings
<b>x</b>	Census Data	X	East Sussex Demographics
	Previous Equality Impact Assessments		National Reports
	Other organisations Equality Impact Assessments		Any other evidence?

#### **3.2 Evidence of complaints against the proposal, project or service on grounds of discrimination.**

Informal concerns about the level of voids have been raised by residents, care staff and Optivo, leading to the project. No formal complaints have been received.

#### **3.3 If you carried out any consultation or research on the proposal, project or service explain what consultation has been carried out.**

- A formal consultation on the proposal to change the way care is provided at Newington Court ran from 10 November to 18 December 2020. Consultation methods were adapted to ensure COVID-19 safety compliance.
- Methods included letters to residents, family carers and people with Power of Attorney; a list of Frequently Asked Questions to explain the proposed changes, updated throughout the consultation and shared with stakeholders
- Phone calls and emails with residents and family members
- Video meeting between ESCC Commissioning officers and representatives of the on-site care team (Care at Home Services)
- Letters to partners
- Briefings to the Director of Adult Social Care
- Briefings to Lead Member
- Briefings to Local Councillors
- Back office meetings inc. project group meetings for all partners
- Attendance at East Sussex Seniors Association (ESSA) forum on 13 November 2020 to gather feedback on the projects potential impact on older people

### **3.4 What does the consultation, research and/or data indicate about the positive or negative impact of the proposal, project or service?**

A total of 45 responses were received during the consultation, the biggest group of respondents was family members and friends of residents. There were a number of themes relating to the negative impact of the proposal that were raised consistently across the various response methods and different groups of respondents.

#### **Summary**

It's clear from the responses to the consultation that people are very concerned about the proposal and how it will affect them or their loved one. There is a lot of mistrust of the Council and people dispute whether we have promoted the scheme properly. Some people raise concerns that potential residents have been turned away from the scheme.

The on-site care team was a big reason for choosing the scheme for people. Respondents worry about the impact of the removal of that support, particularly at night, and how it will affect the health and wellbeing of residents, and the delivery of care services. People fear that residents will be forced to move from their homes to get the care they need if the proposal goes ahead.

The detailed key themes set out below cover feedback received via all methods. We have focused mainly on issues raised by four or more comments for this summary. You can find all the comment themes received by each method in the relevant appendices.

#### **Key themes about the proposal**

##### **Views about the proposal:**

- Respondents are concerned about the proposal to change how care is provided at Newington Court and the impact it will have on people living there (8 comments).
- Some people say the proposal should not go ahead (5 comments) and Newington Court should be maintained as an extra care scheme (2 comments).
- Some people acknowledge the financial challenges at the scheme which are set out in the consultation (3 comments), while one person flagged the effect of Covid on care homes and how this might affect future recruitment to the scheme.

##### **How allocations have been managed:**

- People say that they know of eligible people who have been turned away or placed in other extra care schemes locally (11 comments).
- People feel that the scheme has been badly promoted or not promoted at all (9 comments), with some also saying that it has been run down on purpose (7 comments).
- People can't understand how it hasn't been possible to find eligible residents (4 comments).

##### **The consultation:**

- People feel that the decision has already been made and that the consultation is just for show and won't make a difference (6 comments).



- Concerns were raised about the consultation information, in particular the truth of the claims about the difficulty in finding new residents (5 comments).

#### Key themes about how people would be affected

##### **Impact on their residency:**

- People say they may, or would, have to move from the scheme if the proposal went ahead (12 comments). Some are clear they don't want to do this and would prefer to stay where they are happy (7 comments).
- Some say they chose Newington Court specifically because it was an extra care scheme and had staff on-site 24/7 (6 comments).
- A small number say they are already planning a move (3 comments).
- It was flagged how stressful any move would be due to the age of residents and that Covid would exacerbate this (3 comments).

##### **Impact on support and services:**

- A lot of respondents talk about the impact on people's health and wellbeing if they couldn't get their needs met (10 comments).
- People are concerned generally about the negative impact of the proposals (8 comments) and how they would affect the delivery of their, or their relatives', care and support (4 comments), and make it harder for them to maintain their independence (4 comments).
- The wider impact on associated services such as the café and GP surgery nearby (7 comments) and on the community feel at the scheme (4 comments) are a concern too.
- Concerns about the impact on peace of mind for families are raised (5 comments), as are concerns about the safety of the residents (4 comments).

##### **Night support:**

- People are particularly concerned and worried about the on-site night support being removed (11 comments) and how this would affect people and the delivery of their care (6 comments).
- There is concern about the speed of support that would be available in future if people needed help overnight and how quickly this would be available via the proposed telecare service (5 comments).
- For some people this would affect their daytime care as early/late calls are provided by on-site night staff and these would be harder to arrange if the scheme changed (5 comments).

#### Key themes for other comments

- There were a good number of positive comments about the current service (7 comments) and the staff providing care and support (6 comments).
- There were also some negative comments about the current service (5 comments).

- Suggestions were made covering the scheme overall (6 comments) and facilities (4 comments), including that the older part of the building become sheltered housing and the new part remain extra care; a more flexible approach be taken to packages; self-funders to be included in the block care financial calculations; and CCTV to be installed in the lobby and corridors if the on-site care is removed.

### ***Sample quotes from respondents***

- “[M]y opinion is that the proposals would be of no benefit to me at all or to any other residents who may or may not require extra care. It seems to me that more strenuous effort to attract new residents would be the answer to the problem and that the best interests of the present residents and staff has not been the prime consideration here.”
- “At least two years ago the ESCC website stated that there were no available flats at Newington Court. This was blatantly untrue. It appears that this consultation is nothing more than a PR exercise and that ESCC and [the provider] have been planning this outcome for years.”
- “Respective residents have been shown the building and then directed to other Schemes. Therefore, leaving empty flat at Newington Court. It is incredulous that there is not one person in either Rother DC or ESCC area that does NOT fit the care criteria!!! Seems this has always been the plan!”
- “I do feel that the future of Newington Court shouldn’t be just a financial consideration, but also viewed from a well being and mental health perspective. It has certainly been a stressful time for my [relative] and [their] fellow residents and friends. I would also ask whether it is appropriate to even be considering this change considering the pandemic we are facing.”
- “I’m very happy with my current care we are very lucky here at Newington Court. I [...] considered this to be my forever home.”
- “We understand the financial reasons behind proposed changes, but are very concerned that the level of security and care will not be the same high standard.”
- “One of the reasons we chose Newington Court is because of the 24/7 onsite care. If this is removed, many of the resident[s] would have to leave.”
- “I would have to move because I sometimes call on night staff [...] heighten my anxiety if someone was not on site – deterioration in health and wellbeing.”
- “I, as many other families, would have to consider alternative arrangements for their loved ones – some of whom have lived there many years. For some, the move at this stage of their lives could have devastating consequences.”
- “I don't reckon much of the night staff not being here – it's going to take longer for the night staff to get here or be expensive with an ambulance each time in an emergency.”
- “As the GP Practice attached to Newington Court we have concerns about the proposal to the changes of care being provided. We are already seeing first-hand the impact that having less regular carers is having on our own workload [..].”
- “I feel that it will not provide the care cover that my [relative] needs to keep what little independence [they have] now.”

- “Your consultation document is very long and I think that quite a few of the resident[s] may not understand it and find it too complicated to read.”
- “There is undoubtedly a definite need for extra housing schemes in rural areas. A large percentage of our residents have lived in villages all their lives and do not want to move to a town. Family members live locally and they also do not want to have to or are unable to travel large distances into towns to visit their loved ones.”

## Part 4 – Assessment of impact

### 4.1 Age: Testing of disproportionate, negative, neutral or positive impact.

#### a) How is this protected characteristic reflected in the County/District/Borough?

The overall population of East Sussex is estimated to be 552,259. East Sussex has a higher than average older population with around 25.4% of people aged over 65, compared to the national average of 18%. There are 294,807 people aged 45+ (53.3%) (ONS Mid-Year Population Estimates in June 2018) in East Sussex, and 21,816 (4%) of these are aged over 85 – East Sussex has one of the highest populations of people aged 85+ in the UK. (2011 mid-year estimates based on 2011 Census data). The tables below shows projected figures in 2018 and how there is a growing older population.

	All people	0-15	16-29	30-44	45-64	65+
East Sussex	552,259	94,004	77,123	86,325	154,337	140,470
Eastbourne	103,251	17,725	15,737	17,820	26,436	25,533
Hastings	92,813	17,274	15,363	16,541	25,627	18,008
Lewes	102,257	17,651	13,780	16,275	28,724	25,827
Rother	94,997	14,156	11,770	11,976	26,997	30,098
Wealden	158,941	27,198	20,473	23,713	46,553	41,004

*Population estimates by age for East Sussex and districts.  
This is the latest data released in June 2018.  
(source: ONS Mid-Year Population Estimates)*

Age group	All people	0-15	16-29	30-44	45-64	65+
Geography						
<u>East Sussex</u>	100.0	17	14	15.6	27.9	25.4
Eastbourne	100.0	17.2	15.2	17.3	25.6	24.7
Hastings	100.0	18.6	16.6	17.8	27.6	19.4
Lewes	100.0	17.3	13.5	15.9	28.1	25.3
Rother	100.0	14.9	12.4	12.6	28.4	31.7

Wealden	100.0	17.1	12.9	14.9	29.3	25.
---------	-------	------	------	------	------	-----

*Percentage of population estimates by age for East Sussex and districts. This is the latest data released in June 2018.*

**b) How is this protected characteristic reflected in the population of those impacted by the proposal, project or service?**

- **Extra Care Housing is designed to offer housing and care support for the age group 55 plus. Of the current 29 residents, 17 are ASC funded clients and 12 are either private pay or have no care and support needs. For ASC funded clients, the average age range is 85 to 94.**
- The majority of the ASC funded clients are older than 85.

**c) Will people with the protected characteristic be more affected by the proposal, project or service than those in the general population who do not share that protected characteristic?**

- Extra Care is predominantly a service provided for older people, aged at least 55.
- There may be a disproportionate impact on residents who have night-time care needs as these would no longer be able to be met at Newington Court. There is currently only one resident with night care needs, and although several residents benefit from the 'peace of mind' that 24/7 onsite care offers, this is generally not accessed by current residents.
- It may however be necessary for residents with night care needs or risks to move accommodation to an alternative Extra Care scheme.
- This proposal may offer an opportunity to more older people with no or low care needs who do not require night cover to access Newington Court
- Changes to the designation of Newington Court could result in an increase in housing with care for residents in Ticehurst and the surrounding area

**d) What is the proposal, project or service's impact on different ages/age groups?**

Older age groups will likely be impacted the most due to the service being primarily used by them. Age can be a factor that can affect people's level of care and support needs and make it more likely that they will have a disability-related illness, and/or a long-term condition.

**e) What actions are to/or will be taken to avoid any negative impact or to better advance equality?**

All residents' individual care and support needs will be assessed or reviewed and if their care can be met in a different way i.e. at a different time or using assistive technology including the Tunstall call system at night. It may not be possible to avoid all negative impact on all residents.

**f) Provide details of the mitigation.**

If the proposal went ahead, the Council would write to all residents at Newington Court and let them know how and when the new model would

change. Residents would then have time between February and November 2020 to make a decision about what they wished to do next before the service changed.

The Council's assessment team would be available to talk to people and their families about what the decision meant for them and look at their options. In some cases, individuals may need to consider alternative accommodation i.e. Extra Care in a different location; this will be decided at the point of their assessment.

Where there is an identified risk, the Council would not withdraw the service until alternatives had been agreed as part of the person's care and support plan.

The work carried out would include:

- Reviewing client records to assess for risk.
- Working with home care providers to identify suitable options.
- Carrying out telephone and face to face assessments in line with COVID-19 regulations.
- Providing support to ensure current clients are in receipt of all eligible benefits to maximise their income, this could include specialist advice and support from key voluntary sector providers.

**g) How will any mitigation measures be monitored?**

Mitigations will be monitored through the:

- The Newington Court Project Group, comprised of Adult Social Care Commissioners, Optivo, Care at Home Services and Rother District Council
- Care management assessment and reviewing process
- Complaints and appeals process
- ASC operational management teams
- Accommodation and Bedded Care Board
- Safeguarding procedures

## 4.2 Disability: Testing of disproportionate, negative, neutral or positive impact.

### a) How is this protected characteristic reflected in the County /District/Borough?

	All people	People with long term health problem and disability	Day-to-day activities limited a little	Day-to-day activities limited a lot	People without long-term health problem or disability
East Sussex	526,671	107,145	58,902	48,243	419,526
<a href="#">Eastbourne</a>	99,412	20,831	11,209	9,622	78,581
<a href="#">Hastings</a>	90,254	19,956	10,375	9,581	70,298
<a href="#">Lewes</a>	97,502	19,054	10,583	8,471	78,448
<a href="#">Rother</a>	90,588	21,242	11,591	9,651	69,346
<a href="#">Wealden</a>	148,915	26,062	15,144	10,918	122,853

Residents with limiting long-term illness in 2011 in East Sussex and its districts (source: ONS Census 2011)

### b) How is this protected characteristic reflected in the population of those impacted by the proposal, project or service?

Of the 29 residents currently residing at Newington Court, 24 of these residents have a limiting long-term illness. They include long term conditions, memory loss issues including dementia, physical disabilities including sensory impairment and substance misuse needs.

Of the 29 residents, only one resident has a scheduled call during the night.

### c) Will people with the protected characteristic be more affected by the proposal, project or service than those in the general population who do not share that protected characteristic?

The impact is assessed as low for the majority of residents have disabilities and/or long term conditions, they are understood to be able to live within the proposed model changes, ie. From extra care to Housing with Care.

The impact for the resident with a night call due to their disability is assessed as high as they may need to move to another more appropriate service. All options will be explored at the point of review to offer as much choice as possible to this resident.

**d) What is the proposal, project or service's impact on people who have a disability?**

For some the impact may be disproportionate as many have an age related disability. This may particularly be the case if they use the on-site night service frequently i.e. if they are at an increasing risk of falls

**e) What actions are to/ or will be taken to avoid any negative impact or to better advance equality?**

In the case of emergency calls, all residents can make emergency calls as they do now, through the pull-cord system which would no longer go through to an on-site care team but to Optivo's Lifeline service. This will support residents and connect them to an emergency service, family or informal carers if this is required. Although this will no longer provide a swift, in person response, this is thought to be appropriate as the levels of need within the scheme are not sufficiently high to justify a 24/7 in person response.

**f) Provide details of any mitigation.**

If the proposal went ahead, the Council would write to all residents at Newington Court and let them know when the night-time care service would be stopping. They would then have time to make a decision about what they wished to do next.

The Council's assessment team would be available to talk to people and their families about what the decision meant for them and look at their options. In some cases, individuals may need to consider alternative accommodation including Extra Care in a different location; this will be decided considered in full at the point of their assessment.

Where there is an identified risk, the Council would not withdraw the service until alternatives had been agreed as part of the person's care and support plan.

The work carried out would include:

- Reviewing client records to assess for risk.
- Working with home care providers to identify suitable options.
- Carrying out telephone and face to face assessments in line with COVID-19 regulations.
- Providing support to ensure current clients are in receipt of all eligible benefits to maximise their income, this could include specialist advice and support from key voluntary sector providers.

**g) How will any mitigation measures be monitored?**

Mitigations will be monitored through the:



- The Newington Court Project Group, comprised of Adult Social Care Commissioners, Optivo, Care at Home Services and Rother District Council
- Care management assessment and reviewing process
- Complaints and appeals process
- ASC operational management teams
- Accommodation and Bedded Care Board
- Safeguarding procedures

**4.3 Ethnicity: Testing of disproportionate, negative, neutral or positive impact.** Race categories are: Colour. E.g. being black or white, Nationality e.g. being a British, Australian or Swiss citizen, Ethnic or national origins e.g. being from a Roma background or of Chinese Heritage

**a) How is this protected characteristic reflected in the County /District/Borough?**

This dataset shows the population by ethnic groups from the 2011 Census.

Ethnicity	All people	Percentage White British and N Irish	Percentage White Irish	Percentage Gypsy or Irish Traveller	Percentage Other White	Percentage Mixed heritage	Percentage Asian/Asian British	Percentage Black/Black British	Percentage other ethnic group
England and Wales	56,075,912	80.5	0.9	0.1	4.4	2.2	7.5	3.3	1.0
South East	8,634,750	85.2	0.9	0.2	4.4	1.9	5.2	1.6	0.6
East Sussex	526,671	91.7	0.8	0.2	3.4	1.4	1.7	0.6	0.3

Source: 2011 Census, Office for National Statistics

**b) How is this protected characteristic reflected in the population of those impacted by the proposal, project or service?**

All residents are recorded as White British, apart from one who is Italian. There are no known language requirements.

**c) Will people with the protected characteristic be more affected by the proposal, project or service than those in the general population who do not share that protected characteristic?**

Overall, the new model of housing with care scheme is expected to impact neutrally on people from different ethnic backgrounds

**d) What is the proposal, project or service's impact on those who are from different ethnic backgrounds?**

The new housing with care scheme will provide support to all residents and to pro-actively engage with partners and deliver and develop the service so that it fully accessible to residents from all backgrounds.

**e) What actions are to/ or will be taken to avoid any negative impact or to better advance equality?**

There may be a positive impact in that the new housing with care scheme attracts more interest for this type of housing and in doing so, includes people from diverse ethnic backgrounds.

**f) Provide details of any mitigation.**

If the proposal went ahead, the Council would write to all residents at Newington Court and let them know when the night-time care service would be stopping. They would then have time to make a decision about what they wished to do next.

The Council's assessment team would be available to talk to people and their families about what the decision meant for them and look at their options. In some cases, individuals may need to consider alternative accommodation including Extra Care in a different location; this will be considered in full at the point of their assessment.

Where there is an identified risk, we would not withdraw the service until alternatives had been agreed as part of the person's care and support plan.

The work carried out would include:

- Reviewing client records to assess for risk.
- Working with home care providers to identify suitable options.
- Carrying out telephone and face to face assessments in line with COVID-19 regulations.
- Providing support to ensure current clients are in receipt of all eligible benefits to maximise their income, this could include specialist advice and support from key voluntary sector providers.

**g) How will any mitigation measures be monitored?**

Mitigations will be monitored through the:

- The Newington Court Project Group, comprised of Adult Social Care Commissioners, Optivo, Care at Home Services and Rother District Council
- Care management assessment and reviewing process
- Complaints and appeals process
- ASC operational management teams
- Accommodation and Bedded Care Board
- Safeguarding procedures

**4.4 Gender/Transgender: Testing of disproportionate, negative, neutral or positive impact**

**a) How is this protected characteristic target group reflected in the County/District/Borough?**

		Total	18+	18-64	65+	18-64 %	65+ %
Female	EAST SUSSEX	273,142	222,604	154,510	68,094	69.4	30.6
Male	EAST SUSSEX	254,067	200,320	147,692	52,628	73.7	26.3
All people	EAST SUSSEX	527,209	422,924	302,202	120,722	71.5	28.5

Source: ONS Mid-Year Population Estimates 2011 (based on Census) by ONS

In an attempt to gather data on numbers of transgender people in East Sussex, and better understand their needs to ensure an appropriate service response for this group, data from 254 "About You" forms were analysed as part of the Listening To You satisfaction questionnaires. The questionnaires were sent to a random sample of service users who had had the provision of OT equipment or sensory equipment / service in the 3 last months; people who had a Direct Payment put in place or reviewed in the last 3 months; and carers. The responses received showed:

- 1% of respondents stated they were transgender
- 5% of respondents said they preferred not to say,
- 94% of respondents stated they were not transgender.

(Source: ASC Equalities Data Set, January 2012)

**b) How is this protected characteristic reflected in the population of those impacted by the proposal, project or service?**

60% of residents are female and 40% are male.  
The Council has no data in relation to transgender.

**c) Will people with the protected characteristic be more affected by the proposal, project or service than those in the general population who do not share that protected characteristic?**

This proposal may have a disproportionate impact on women. Data shows that there are more women using the service, reflecting the fact that women tend to live longer. This means more women may be affected by the new model, equally the new housing with care scheme could attract more interest for this type of housing and in doing so, includes more women.

**d) What is the proposal, project or service's impact on different genders?**

Women are more represented in the over 65 age group than men and therefore more likely to be impacted by the proposal.

ASC does not hold data on clients who fall under the transgender protected characteristic. We do not envisage any inequalities caused by this proposal.

Female carers may be more affected if where there is not an on-site care team and as a result, residents may contact their informal carer more frequently for their care and support.

**e) What actions are to/ or will be taken to avoid any negative impact or to better advance equality?**

Identification of carers and signposting to carers support or an offer of a carers assessment as part of the resident's review.

**f) Provide details of any mitigation.**

If the proposal went ahead, the Council would write to all residents at Newington Court and let them know when the night-time care service would be stopping. They would then have time to make a decision about what they wished to do next.

The Council's assessment team would be available to talk to people and their families about what the decision meant for them and look at their options. In some cases, individuals may need to consider alternative accommodation including Extra Care in a different location; this will be considered in full at the point of their assessment.

Where there is an identified risk, we would not withdraw the service until alternatives had been agreed as part of the person's care and support plan.

The work carried out would include:

- Reviewing client records to assess for risk.
- Working with home care providers to identify suitable options.
- Carrying out telephone and face to face assessments in line with COVID-19 regulations.
- Providing support to ensure current clients are in receipt of all eligible benefits to maximise their income, this could include specialist advice and support from key voluntary sector providers.

**g) How will any mitigation measures be monitored?**

Mitigations will be monitored through the:

- The Newington Court Project Group, comprised of Adult Social Care Commissioners, Optivo, Care at Home Services and Rother District Council
- Care management assessment and reviewing process
- Complaints and appeals process
- ASC operational management teams
- Accommodation and Bedded Care Board
- Safeguarding procedures

**4.5 Marital Status/Civil Partnership: Testing of disproportionate, negative, neutral or positive impact.**

**a) How is this protected characteristic target group reflected in the County/District/Borough?**

This dataset shows the number of people aged 16 and over and the percentage by marital status from 2011 Census.

Marital Status	All people aged 16 and over	Percent single	Percent married	Percent in a registered same-sex civil partnership	Percent separated	Percent divorced	Percent widowed
Geography							
England and Wales	45,496,780	34.6	46.6	0.2	2.6	9.0	7.0
South East	6,992,666	31.9	49.3	0.2	2.5	9.1	6.9
East Sussex	435,515	29.1	48.4	0.3	2.7	10.7	8.7

Source: 2011 Census, Office for National Statistics

Marital status in 2011 – districts (%)

Marital Status	All people aged 16 and over	Single	Married	In a registered same-sex civil partnership	Separated	Divorced	Widowed
Geography							
England & Wales	100	34.6	46.6	0.2	2.6	9	7
South East	100	31.9	49.3	0.2	2.5	9.1	6.9
East Sussex	100	29.1	48.4	0.3	2.7	10.7	8.7
Eastbourne	100	33.3	42.8	0.4	3	11.5	9.1
Hastings	100	36.5	39.2	0.3	3.7	12.8	7.4
Lewes	100	28.7	49.6	0.5	2.5	10.2	8.4
Rother	100	24.7	51.3	0.3	2.6	10.3	10.8
Wealden	100	24.9	55.1	0.2	2.3	9.4	8.2

**b) How is this protected characteristic reflected in the population of those impacted by the proposal, project or service?**

- This would be a neutral impact characteristic.

**4.6 Pregnancy and maternity: Testing of disproportionate, negative, neutral or positive impact.**

**a) How is this protected characteristic target group reflected in the County/District/Borough?**

This dataset shows the number of live births by age of mother and also rates per 1,000 women in each age group.

Measure	Number of live births							Rate per 1,000 women						
	All live births	Under 20	20-24	25-29	30-34	35-39	40 and over	All live births	Under 20	20-24	25-29	30-34	35-39	40 and over
Age of mother														
Geography														
England	625,651	17,773	85,516	171,262	203,470	119,744	27,878	60.9	14.7	50.1	91.1	107.2	64.0	16.4
South East	96,748	2,220	11,440	24,925	32,950	20,479	4,734	60.5	11.1	44.1	92.8	118.3	67.7	16.3
East Sussex	4,941	145	731	1,400	1,531	914	220	60.4	13.0	58.7	103.9	109.4	59.7	14.2

Source: Office for National Statistics, via Nomis

**b) How is this protected characteristic reflected in the population of those impacted by the proposal, project or service?**

Due to the age of the clients, this protected characteristic is not relevant.

**4.7 Religion, Belief: Testing of disproportionate, negative, neutral or positive impact.**

**a) How is this protected characteristic reflected in the County/District/Borough?**

This dataset shows the percentage of the population by religion from 2011 Census.

Religions	All people	Percent Christian	Percent Buddhist	Percent Hindu	Percent Jewish	Percent Muslim	Percent Sikh	Percent other religions	Percent no religion	Percent religion not stated
Geography										
England and Wales	56,075,912	59.3	0.4	1.5	0.5	4.8	0.8	0.4	25.1	7.2
South East	8,634,750	59.8	0.5	1.1	0.2	2.3	0.6	0.5	27.7	7.4
East Sussex	526,671	59.9	0.4	0.3	0.2	0.8	0.0	0.7	29.6	8.1

Source: 2011 Census, Office for National Statistics

**b) How is this protected characteristic reflected in the population of those impacted by the proposal, project or service?**

One resident is recorded as Christian and all other residents are recorded as unknown / undeclared.

- c) **Will people with the protected characteristic be more affected by the proposal, project or service than those in the general population who do not share that protected characteristic?**

There may be a positive impact as the new housing with care scheme could attract more interest for this type of housing and in doing so, include more people with different religions or beliefs.

- d) **What is the proposal, project or service's impact on the people with different religions and beliefs?**

There may be a positive impact, as the housing with care scheme may attract more interest from wider groups of people with different beliefs and religions.

- e) **What actions are to/ or will be taken to avoid any negative impact or to better advance equality?**

Newington Court housing with care accommodation will be open to everyone who meets the eligibility criteria of requiring accommodation and support. This will better advance equality but may have a negative or neutral impact on some people from diverse religious backgrounds.

- f) **Provide details of any mitigation.**

If the proposal went ahead, the Council would write to all residents at Newington Court and let them know when the night-time care service would be stopping. They would then have time to make a decision about what they wished to do next.

The Council's assessment team would be available to talk to people and their families about what the decision meant for them and look at their options. In some cases, individuals may need to consider alternative accommodation including Extra Care in a different location; this will be considered in full at the point of their assessment.

Where there is an identified risk, we would not withdraw the service until alternatives had been agreed as part of the person's care and support plan.

The work carried out would include:

- Reviewing client records to assess for risk.
- Working with home care providers to identify suitable options.
- Carrying out telephone and face to face assessments in line with COVID-19 regulations.
- Providing support to ensure current clients are in receipt of all eligible benefits to maximise their income, this could include specialist advice and support from key voluntary sector providers.

- g) **How will any mitigation measures be monitored?**

Mitigations will be monitored through the:

- The Newington Court Project Group, comprised of Adult Social Care Commissioners, Optivo, Care at Home Services and Rother District Council
- Care management assessment and reviewing process
- Complaints and appeals process

- ASC operational management teams
- Accommodation and Bedded Care Board
- Safeguarding procedures



**4.8 Sexual Orientation - Gay, Lesbian, Bisexual and Heterosexual: Testing of disproportionate, negative, neutral or positive impact.**

**a) How is this protected characteristic reflected in the County/District/Borough?**

<b>Sexual Identity – South East</b>	<b>Number</b>	<b>%</b>
<b>Heterosexual or straight</b>	<b>6,703,000</b>	<b>93.4%</b>
<b>Gay or lesbian</b>	<b>87,000</b>	<b>1.2%</b>
<b>Bisexual</b>	<b>61,000</b>	<b>0.9%</b>
<b>Other</b>	<b>38,000</b>	<b>0.5%</b>
<b>Don't know or refuse</b>	<b>284,000</b>	<b>4.0%</b>

*(Source: ONS data 2016)*

**b) How is this protected characteristic reflected in the population of those impacted by the proposal, project or service?**

We do not envisage any inequalities for this protected characteristic for this proposal.

**4.9 Other: Additional groups/factors that may experience impacts - testing of disproportionate, negative, neutral or positive impact.**

**These are - Rural Areas and Carers.**

**a) How are these groups/factors reflected in the County/District/ Borough?**

**Carers**

- The majority of carers in East Sussex are of working age, with 26 per cent being over 65. The peak age for caring is 50-64 both locally and nationally.
- 2,000 (3%) of carers in East Sussex are aged over 85 years.
- 50% of carers being supported by the current Carers Centre and 55% of carers known to Adult Social Care are aged over 65.
- The 2011 Census identified that 58% of carers are women and 42% men in East Sussex.
- Service data from the Carers Centre for East Sussex shows that 73% of carers supported are female and 27% male.
- Of those carers known to ASC, 67% are female and 32% male.

**Rural:**

- According to the 2011 Census, 26% of East Sussex residents live in rural areas.

**b) How is this group/factor reflected in the population of those impacted by the proposal, project or service?**

**Carers**

- A negative impact is anticipated for informal carers.
- There are three couples residing at Newington Court where there is an informal carer role present.
- There are also a number of informal carers supporting family members living at Newington Court.
- As stated in section 4.4 plus, we know that carers often rely on the current on-site provision, giving them peace of mind to enable them to go to work or do other activities as it provides an assurance that the cared for person will be checked on in the day.
- Recent studies have found that BAME carers fail to access support because they are often unaware that such support exists.

**Rural**

A positive impact is anticipated for people living in rural areas.

Newington Court accommodate people who come from rural settings. By changing the model to housing with care, this extends the opportunity for more people in the rural and surrounding area of Ticehurst to be potentially eligible for this type of housing and support.

**c) Will people within these groups or affected by these factors be more affected by the proposal, project or service than those in the general population who are not in those groups or affected by these factors?**

Yes, both for rural population and carers.

**d) What is the proposal, project or service's impact on the factor or identified group?**

The negative impact on carers will be determined depending on the level of support required by the cared for resident from the informal carer under this proposal (the cared for may need to rely more on the carer as part of this proposal).

It is a positive impact for the rural characteristic as explained in section 4.9 b.

**e) What actions are to/ or will be taken to avoid any negative impact or to better advance equality?**

Residents and carers will both be offered a review or assessment to determine their individual changing needs under the proposal.

Tunstall lifeline is available for both day and night-time emergencies.

The Scheme Manager will continue to be on-site for general housing support and residents will still receive their scheduled care calls.

**f) Provide details of the mitigation.**

If the proposal went ahead, the Council would write to all residents and their carers at Newington Court and let them know when the night-time care service would be stopping. They would then have time to make a decision about what they wished to do next.

The Council's assessment team would be available to talk to people and their families about what the decision meant for them and look at their options. In some cases, individuals may need to consider alternative accommodation including Extra Care in a different location; this will be considered in full at the point of their assessment.

Care reviews will particularly take into consideration the wishes of family/unpaid carers and any impact including should any resident need to move home.

Where there is an identified risk, we would not withdraw the service until alternatives had been agreed as part of the person's care and support plan.

The work carried out would include:

- Reviewing client records to assess for risk.
- Working with home care providers to identify suitable options.
- Carrying out telephone and face to face assessments in line with COVID-19 regulations.
- Providing support to ensure current clients are in receipt of all eligible benefits to maximise their income, this could include specialist advice and support from key voluntary sector providers.

**g) How will any mitigation measures be monitored?**

Mitigations will be monitored through the:

- The Newington Court Project Group, comprised of Adult Social Care Commissioners, Optivo, Care at Home Services and Rother District Council
- Care management assessment and reviewing process
- Complaints and appeals process
- ASC operational management teams
- Accommodation and Bedded Care Board
- Safeguarding procedures

**4.10 Human rights** - Human rights place all public authorities – under an obligation to treat you with fairness, equality, dignity, respect and autonomy. **Please look at the table below to consider if your proposal, project or service may potentially interfere with a human right.**

None apply.

<b>Articles</b>	
<b>A2</b>	<b>Right to life (e.g. pain relief, suicide prevention)</b>
<b>A3</b>	<b>Prohibition of torture, inhuman or degrading treatment (service users unable to consent, dignity of living circumstances)</b>
<b>A4</b>	<b>Prohibition of slavery and forced labour (e.g. safeguarding vulnerable adults)</b>
<b>A5</b>	<b>Right to liberty and security (financial abuse)</b>
<b>A6 &amp; 7</b>	<b>Rights to a fair trial; and no punishment without law (e.g. staff tribunals)</b>
<b>A8</b>	<b>Right to respect for private and family life, home and correspondence (e.g. confidentiality, access to family)</b>
<b>A9</b>	<b>Freedom of thought, conscience and religion (e.g. sacred space, culturally appropriate approaches)</b>
<b>A10</b>	<b>Freedom of expression (whistle-blowing policies)</b>
<b>A11</b>	<b>Freedom of assembly and association (e.g. recognition of trade unions)</b>
<b>A12</b>	<b>Right to marry and found a family (e.g. fertility, pregnancy)</b>
<b>Protocols</b>	
<b>P1.A1</b>	<b>Protection of property (service users property/belongings)</b>
<b>P1.A2</b>	<b>Right to education (e.g. access to learning, accessible information)</b>
<b>P1.A3</b>	<b>Right to free elections (Elected Members)</b>

## Part 5 – Conclusions and recommendations for decision makers

### 5.1 Summarise how this proposal/policy/strategy will show due regard for the three aims of the general duty across all the protected characteristics and ESCC additional groups.

- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010;
- Advance equality of opportunity between people from different groups
- Foster good relations between people from different groups

### 5.2 Impact assessment outcome Based on the analysis of the impact in part four mark below ('X') with a summary of your recommendation.

X	Outcome of impact assessment	Please explain your answer fully.
	<b>A No major change</b> – Your analysis demonstrates that the policy/strategy is robust and the evidence shows no potential for discrimination and that you have taken all appropriate opportunities to advance equality and foster good relations between groups.	There are some negative impacts which are likely to disproportionately affect some of the protected characteristics, primarily Age, Gender and Carers, and residents’ informal carers through the removal of 24/7 onsite care.
	<b>B Adjust the policy/strategy</b> – This involves taking steps to remove barriers or to better advance equality. It can mean introducing measures to mitigate the potential effect.	There are some minimal or neutral impacts on residents and their informal carers who do not have care needs or who do not have night care needs.
X	<b>C Continue the policy/strategy</b> - This means adopting your proposals, despite any adverse effect or missed opportunities to advance equality, provided you have satisfied yourself that it does not unlawfully discriminate	There are some positive impacts on residents and informal carers as the removal of minimum care hours to access the service will be removed, opening up access to some of the other Protected Characteristics, including faith.
	<b>D Stop and remove the policy/strategy</b> – If there are adverse effects that are not justified and cannot be mitigated, you will want to consider stopping the policy/strategy altogether. If a policy/strategy shows unlawful discrimination it <i>must</i> be removed or changed.	Carers and residents’ views will be taken into consideration via the formal consultation and recommendation made to the Lead Member for Adult Social Care. Views on care options will also be taken into account if the proposal is agreed and residents’ care needs are reviewed.

**5.3 What equality monitoring, evaluation, review systems have been set up to carry out regular checks on the effects of the proposal, project or service?**

**Systems include:**

- Fortnightly Project Group meetings to plan and monitor implementation of the proposed changes, if agreed by Lead Member
- Close working with the Countywide Review Team to ensure any changes to care provision are shared appropriately with partners
- Ongoing consideration of the Equality Impact Assessment on the Protected Characteristics

**5.6 When will the amended proposal, proposal, project or service be reviewed?**

The proposal, if approved, will be reviewed at regular

<b>Date completed:</b>	<b>23 December 2020</b>	<b>Signed by (person completing)</b>	<b>Angela Yphantides</b>
		<b>Role of person completing</b>	<b>Strategic Commissioner</b>
<b>Date:</b>		<b>Signed by (Manager)</b>	

## Part 6 – Equality impact assessment action plan

If this will be filled in at a later date when proposals have been decided please tick here and fill in the summary report.

The table below should be completed using the information from the equality impact assessment to produce an action plan for the implementation of the proposals to:

1. Lower the negative impact, and/or
2. Ensure that the negative impact is legal under anti-discriminatory law, and/or
3. Provide an opportunity to promote equality, equal opportunity and improve relations within equality target groups, i.e. increase the positive impact
4. **If no actions fill in separate summary sheet.**

Please ensure that you update your service/business plan within the equality objectives/targets and actions identified below:

Area for improvement	Changes proposed	Lead Manager	Timescale	Resource implications	Where incorporated/flagged? (e.g. business plan/strategic plan/steering group/DMT)
Promotion of the new model of care to RDC to target people with low/no care needs from different backgrounds, beliefs, abilities and orientations	Promotion via LDC to clients from different BAME, faith, abilities and orientations to fill voids and also increase diversity and inclusion.	Angela Yphantides	February – November 2021	Within existing resource	Project Group
Care reviews will particularly take into consideration the wishes of family/unpaid carers, should any resident need to move home	Care reviews will pay particular attention to the support offered by family/unpaid carers	Angela Yphantides	February – November 2021	Within existing resource	Project Group

## 6.1 Accepted Risk

From your analysis please identify any risks not addressed giving reasons and how this has been highlighted within your Directorate:

Area of Risk	Type of Risk? (Legal, Moral, Financial)	Can this be addressed at a later date? (e.g. next financial year/through a business case)	Where flagged? (e.g. business plan/strategic plan/steering group/DMT)	Lead Manager	Date resolved (if applicable)
<b>Risk to ESCC</b> – public protest if night/guaranteed on-site day care is removed	<b>Reputational</b>	Yes, via Project Group	Project Group	Angela Yphantides	November 2021
<b>Risk to ESCC</b> – Newington Court was included in Tier 4 restrictions as the consultation closed, which may heighten concerns amongst the resident population, and their families/carers	<b>Timing/reputational</b>	Yes, via Project Group	Project Group	Angela Yphantides	November 2021
<b>Risk to ESCC</b> – Additional Newington clients may choose to move to other Extra Care schemes if the night care is removed, provided they meet the eligibility criteria	<b>Pressure on ESCC Operational Teams</b>	Yes, via Project Group	Project Group	Angela Yphantides	November 2021
<b>Risk to ESCC</b> – if LM decides not to accept the proposal, ASC will continue	<b>Financial</b>	Yes, via Project Group	Project Group	Angela Yphantides	November 2021



to incur a cost pressure					
<b>Risk to ESCC</b> – The continued loss may result in less interest at the point of tender	<b>Limited market Interest</b>	Yes, via Project Group	Project Group	Angela Yphantides	November 2021