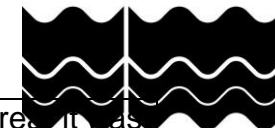


Equality Impact Assessment

Title of Project/Service/Policy	Affinity Trust (Beckley Close and Jasmine Lodge) deregistration and change from Residential Care to Supported Living
Team/Department	Learning Disability Commissioning
Directorate	Strategic Commissioning & Supply Management
Provide a comprehensive description of your Project (Service/Policy, etc.) including its Purpose and Scope	<p><u>Reviewed and updated on 19/11/2025 to reflect changes since 04/11/2024, 14/12/2023 and 06/07/22 reviews of the original EqlA dated 07/10/21.</u></p> <p>The strategic direction of East Sussex County Council's (ESCC) commissioned services for adults with a learning disability is to increase supported living provision. The Council aims to provide high quality accommodation that is able to meet the current and future needs of existing East Sussex residents and support the cohort of younger people transitioning into Adult Services. This approach is in line with personalisation principles set out in 'Building the Right Support' (NHS England, Local Government Association, Association of Directors of Adult Social Services, 2015), 'Registering the Right Support' (Care Quality Commission, 2017) and Right Support, Right Care, Right Culture (CQC, updated 2021).</p> <p>Supported living for people with a learning disability is sought as a first option by ASC, where this is in line with assessed needs, before residential care placements are considered. This is particularly the case for the younger cohort of people with a learning disability coming through transitions into adult services.</p> <p>A supported living model offers more choice and flexibility for the people supported and will enable them to have tenancies further securing their legal rights to the property. They will also be able to access a range of welfare benefits not eligible to those in a residential care setting, increasing financial stability.</p> <p>1:1 support can be better tailored to individual need aiming to work towards increased independence. This approach to care and support is well suited to driving forward the key priority areas in the Council Plan, of helping people to help themselves.</p>



	<p>Following the retender of 5 existing residential care homes in the Hastings and Bexhill area, it was agreed that one of these properties, Beckley Close, is reregistered as Supported Living during 2022-2023 with a further property, Jasmine Lodge, identified for 2023-2025. This will include the redevelopment of the properties, providing more ensuite facilities and significant improvements made to the internal aspects of property, to support the change in model moving forward for the current people supported as well as the younger cohort needing accommodation and support in the future, in line with the statutory duty under the Care Act 2014 to provide care and support for eligible local people. It will also contribute to increasing the range of settled accommodation options available in the county for adults with a learning disability, to work towards improving performance in this area in East Sussex.</p> <p>The original proposal is based on the aim of keeping these existing services sustainable for the future; a similar care setting that used to be part of this overall care contract was closed in 2018 due to increasing voids and inability to fill these due to the increasingly outdated residential care service model and environment offered. A similar situation arising in the future would lead to the risk of fewer options being available for people requiring support and the need to move out of a service.</p> <p>This Equalities Impact Analysis will focus on the two proposed properties. This will include the potential impacts on the individuals who live within the properties, their families (or those important to the individuals) based on known protected equality characteristics, including the potential impact of a temporary move to alternative accommodation whilst building works are completed.</p> <p>Early consultation with people who use the service, and their families took place including information sharing relating to the proposals, agreements reached and how communication will continue throughout the project. The people who use the service have complex communications needs so careful consideration has been given throughout to ensure that any information is both accurate and presented in a way that the people supported can understand, and people's views will be taken into consideration as part of the overall project.</p> <p>Consultation took place with the current provider to remodel to Supported Living and formed part of their re-tender application. The provider organisation has a proven track record of deregistering residential care services and reregistering as supported living. The provider has supported the current people for many years and knows each individual well. Furthermore, the care provider</p>
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	<p>supported clients and their families when one of their previous residential care homes close in 2018, and clients were supported to move into their other existing services.</p> <p>The Community Learning Disability Team (CLDT) have been engaged in the process and have been central to reassessments of the clients and have supported the commissioning team in gathering information relating to those who use the service. Furthermore, the CLDT, East Sussex Specialist Brokerage Team and the East Sussex Transitions Team have been consulted in relation to future needs of projected clients who will require supported living services over the coming years. All these stakeholders are in support of the proposal to ensure that the service remains sustainable in the years ahead, improves the quality of accommodation for current people supported, and is suitable for the younger cohort of people who will require support in the future.</p> <p>Targeted work was completed by ESCC and Affinity Trust in relation to identifying alternative temporary placements for the clients living at Beckley Close so the extensive construction works could progress at Beckley Close in phase 1 of the project. A multi-disciplinary working party met regularly to complete targeted work around assessment of need, capacity assessments, Best Interest Assessments, matching to existing vacancies within the current care providers portfolio, and ensured that each person had support from their family or formal advocates as appropriate. Clients and their families were supported to view the alternative accommodation provision on offer, spend time with the receiving staff teams and to have a formal induction prior to the temporary moves being made. The clients at Beckley Close were supported to move to the short-term provision in the first week of June 2023 (and returned to Beckley Close week commencing 9th September 2024) The clients at Jasmine Lodge were relocated to their temporary alternative accommodation week commencing 23rd September 2024.</p> <p>Westridge Construction were awarded the contract in June 2023, and construction works at Beckley Close started in July 2023. Works were progressing well, but regrettably we were informed in September 2023 that Westridge had gone into administration and construction work was paused. This led to a delay in the overall project resulting in the temporary moves being extended beyond the original forecasted completion time. Family members were informed of the delay and continued to receive regular updates as things progressed. Families also had a point of contact within Affinity Trust should they have any ongoing concerns.</p> <p>ESCC and the Administrator overseeing Westridge's affairs worked together closely to agree a Contract Novation with an alternative contractor. A new contractor, BMR, was awarded the contract and restarted on site at Beckley Close in January 2024; construction work progressed</p>
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	<p>well and was completed ahead of time however, ESCC formally took handover on 28th August 2024.</p> <p>Detailed transition planning supported a phased return for clients back to their newly developed home week commencing 9th September 2024. The project has relied on partnership working and forging strong working relationships between multiple external partners and agencies including the Care and Support provider, Building Contractors, Project Management Consultants, Architects and Landscapers, as well as collaboration with internal departments including the Community Learning Disability Team (CLDT), Appointee & Deputyship Team (ADT), Estates, Finance Dept and Occupational Therapy teams. This amalgamation of stakeholders has been key to the success of Phase 1 and has been pivotal to the planning and development process of Phase 2 (Jasmine Lodge development) ensuring these lessons learned including best practice and any improvements or solutions are utilised to benefit Phase 2. Phase 1 of the project focussed on the completion of Beckley Close and from feedback received from tenants via observations/interactions, families and stakeholders this development and change in service model has improved outcomes for the individuals supported at Beckley Close.</p> <p>The Supported Living Project Board continues to oversee each phase of the project ensuring a collaborative, robust governance and decision-making process.</p>
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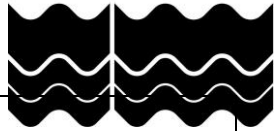
1. Update on previous EqlAs and outcomes of previous actions (if applicable)

What actions did you plan last time? (List them from the previous EqlA)	What improved as a result? What outcomes have these actions achieved?	What <u>further</u> actions do you need to take? (add these to the Action Plan below)
This document has been updated to reflect the developments within Phase 1 of the project enhancing the content of the original document and subsequent reviews.	The EqlA better reflects the impact and measures in place to support activity and actions required moving into Phase 2 of the project.	All actions are detailed in this document and will be subject to ongoing review.

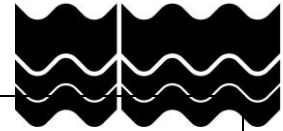
2. Review of information, equality analysis and potential actions

Consider the actual or potential impact of your project (service, or policy) against each of the equality characteristics.

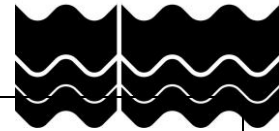
Protected characteristics groups under the Equality Act 2010	What do you know? Summary of data about your service-users and/or staff	What do people tell you? Summary of service-user and/or staff feedback	What does this mean? Impacts identified from data and feedback (actual and potential)	What can you do? All potential actions to: <ul style="list-style-type: none"> • advance equality of opportunity, • eliminate discrimination, and • foster good relations
Age	<p>Beckley Close Age ranges from 40 – 66 Ave age 57 40-50=2 50-60=1 60-70=2</p> <p>All people supported have lived in the service for approximately 14 years.</p> <p>Jasmine Lodge Age ranges from 47-66 Ave age 58</p>	<p>The age range of clients in service indicates that the current model (traditional residential care with shared only facilities) is less suitable for younger clients, however a change to supported Living will make the service more accessible to a younger cohort of people in years to come.</p>	<p>Evidence in this area identifies that for many of the clients these have been long-term stable placements. Any additional concerns relating to age will be identified for individuals as part of the ongoing communication process.</p>	<p>The intention is to continue to support the people in their current homes. Supported Living will enable individuals to have greater control over their care and support and will enable them to have tenancies further securing their legal rights to the property. They will also be able to access a range of welfare benefits not afforded to those in a residential care setting.</p> <p>Remodelling the physical environment to incorporate a higher specification in terms of bathing, hoisting and additional space will also future proof the accommodation for emerging and changing needs of the existing clients as well as for future tenants.</p> <p>Remodelling the service to Supported Living will make it more attractive to younger people should voids appear. This will sustain viability of the service in years to come and</p>



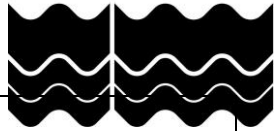
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	40-50=1 50-60=2 60-70=2 People have lived in the service for 1-23 years.			<p>further develops supported living to meet the needs of a wider group of people.</p> <p>For the project to be completed, people will be required to vacate their current accommodation for a period of approximately 9-12 months. Clients that made the temporary move from Beckley Close settled well in their temporary alternative accommodation and no significant concerns were raised. Clients were accommodated in other services with the same care provider and with staff who knew them well, in environments suitable to meet their care and support needs. Regrettably, the originally anticipated period of 6 to 8 months had to be extended following the unavoidable pause on construction and work undertaken to instruct a new contractor. It is envisaged that the original estimated 6-8 months for those at Jasmine Lodge as the second phase of the development will remain unchanged but will be subject to a delay in starting. Adults were supported to move from Jasmine Lodge week commencing 23rd September 2024 to</p>



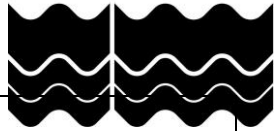
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				<p>their temporary alternative accommodation with a provisional start on site date for the contractor scheduled for Monday 7th October 2024, however, there have been an additional unavoidable delay. Clients that made the temporary move from Jasmine Close are settled in their temporary alternative accommodation and no significant concerns have been raised. As with Beckley Close, clients are accommodated in other services with the same care provider and with staff who know them well, in environments suitable to meet their care and support needs. Regrettably, the originally anticipated period of 6 to 8 months has had to be extended given initial start on site delays. The practical completion of the build was completed on 11th August however there have been some delays with lease arrangements requiring authorisation from NHSE. The CLDT and commissioning team remain in contact with the provider via fortnightly mobilisation meetings to review how people are being supported, and advocacy will also be involved when people are to return to their original accommodation.</p>



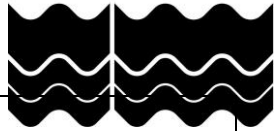
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				The provider has previous experience of closing residential care home and a working party specifically to explore the needs of the individuals to ensure that appropriate accommodation was sourced within existing services. This was successful and a similar methodology was used to support the recent moves along with the lessons learned from Phase One of the project in the multi-disciplinary approach and transition planning
Disability	Beckley Close All 5 people have diagnosed Learning disabilities and additional health/physical needs. All clients use nonverbal methods of communication and rely on people who know them well to ensure that their physical, emotional and	People who use the service have a range of communication needs linked to their diagnosed learning disability. Mental capacity is a key consideration and individual capacity assessments specific to accommodation were completed for those at Beckley Close. These will be required for the people at Jasmine	A change to supported living may present tangible benefits for the current people supported and future tenants receiving a service. This includes: <ul style="list-style-type: none"> • Being supported to achieve greater control over who supports them and when support is given 	Easy read documentation has been produced to support people to understand tenancies and additional resources will be produced to support communication throughout the process. Easy read ESCC Housing Toolkit utilised to support and maximise understanding of the move process. People supported received easy read letters that detailed the proposed changes and approvals reached at each stage. This has been supported by the staff at Affinity Trust, however it remains unclear how many people have been able to understand and retain this information at this point.



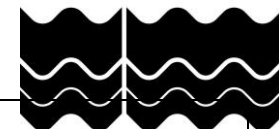
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	<p>communication needs are met. The MCA process has identified that all 5 people lacked capacity to make specific decisions relating to their accommodation. Best Interest decision have been made with input from important people in their lives as well as formal advocacy support for those who needed it IMCA).</p> <p>Jasmine Lodge All 5 people have diagnosed Learning disabilities and additional</p>	<p>Lodge as part of the planning process. As a result, securing detailed and specific feedback may not be achievable for some of the people. However, the clients have resided in this service for many years and the view from staff, commissioners and other professionals are that the clients' needs are well met, and the clients are able to indicate via behaviours and other forms of communication that they are settled and happy in their current accommodation.</p>	<ul style="list-style-type: none"> • Access to a range of welfare benefits to increase financial stability • Security of tenure • Being supported to be involved as far as possible with choosing who they live with and consultation relating to new tenants • Newly modernised accommodation that meets current and future needs • Continued support from a provider who knows them well and is committed to their welfare 	<p>The LD Commissioning Team have discussed the need for formal advocacy support with the Senior Commissioning Manager (Mental Health) who has oversight of the Advocacy contract for ASC. Support to access advocacy is available and has been appropriately accessed for those who are eligible.</p> <p>Enabling people to access tenancies, welfare benefits and have control over their care and support will advance equality.</p> <p>It will be the same care provider when Jasmine Lodge changes to supported living, and this care provider has supported current clients for a number of years, so have a good understanding of their care needs. Equality and inclusivity have been central to informing external and internal designs, the build specification, temporary move planning and transition arrangements, as well as future support structures with the aim of developing services that are fit for purpose,</p>



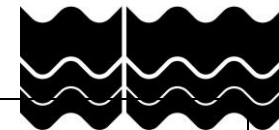
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	<p>health/physical needs. All clients use nonverbal methods of communication and rely on people who know them well to ensure that their physical, emotional and communication needs are met.</p> <p>2 of the people receiving a service have behaviour that requires specific support to maintain safety.</p> <p>Early indication is that all 5 people are thought to lack capacity to make specific decisions relating to their</p>	<p>Ongoing communication with parents and family members will inform further content in this area.</p>	<p>Potential negative impacts could include:</p> <ul style="list-style-type: none"> • Temporary moves whilst the building is modernised could lead to short term distress or confusion This will be mitigated by a care provider and staff who know the people well. <p>Any new accommodation will need to take in to account the client's needs specifically relating to those with a visual impairment to ensure that any environmental changes can be managed in a way</p>	<p>accessible, adaptable to individuals needs and provide a sustainable resource within ESCC's Supported Living portfolio. Continued regular and effective communication has been maintained with both people supported and their families/supporters ensuring they are reliably informed and reassured on all relevant stages of the building works, updated timescales, temporary moves and return to their home. This also offered families/supporters an opportunity to raise any concerns or request further information.</p> <p>Capacity assessments and best interest decisions formed part of the process throughout the project. Due consideration was given at review prior to tenants returning to Beckley Close to establish if the clients would benefit from remaining in the temporary accommodation (placement made permanent) if there are tangible identified benefits to the individual, or if it is identified that returning to the previous accommodation may be more distressing</p>



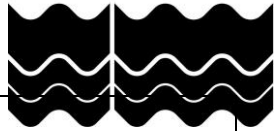
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	accommodation. This will be formally assessed and if needed, a best interest decision will be made including the views of important people in their lives as well as formal advocacy support if required (IMCA).		that limits disruption to those individuals.	than remaining in the short-term accommodation. This Best Interest process will also be completed prior to people supported returning to Jasmine Lodge. To facilitate a smooth transition from Beckley Close and Jasmine Lodge to alternative accommodation, people were supported to visit and spend time in the new services. This included introduction visits to become familiar with the services and the staff team. Furthermore, the existing staff team at Beckley relocated to the new services to provide continuity of care. Clients' welfare has been monitored through regular Operational Management group meetings. People at Beckley Close settled well, and the process of managing the moves was viewed positively. To this end the same process was followed to support the moves from Jasmine Lodge. When managing the temporary moves and the return to their remodelled home/s, many significant individual tasks across various internal and external partners



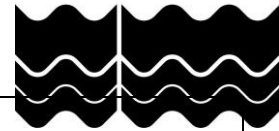
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				<p>had to be co-ordinated to ensure a personalised, bespoke transition with minimal impact and maximising involvement of people supported and their supporters. Detailed monitoring trackers and spreadsheets were developed to oversee and co-ordinate the moves. Having this layer of management and accountability ensured that all identified tasks were completed to achieve a successful and timely transition for each individual whilst considering and protecting their wellbeing within the process.</p> <p>On the basis of the evidence of these recent moves and the feedback obtained, individuals have responded favourably to the change, newly remodelled environment and increased opportunities for community participation.</p>
Gender reassignment	No communicated impact in this area.	Feedback from care provider and care managers tells us that that this protected	No perceived impact relating to current people residing in the accommodation.	The current provider would effectively manage protected characteristics in this area for any future people who chose to access the accommodation.



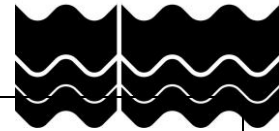
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		characteristic is not applicable for the current people living in the property.		
Pregnancy and maternity	Beckley Close 2 people are female Jasmine Lodge 3 people are female	Feedback from care provider and care management tells us that that none of the people identified are pregnant or likely to engage in sexual relationships. All the current people in the placement have severe learning disabilities, additional communication needs, physical health needs and vulnerabilities that requires intensive support from professional carers.	No perceived impact relating to current people residing in the accommodation.	No specific actions identified in this area.



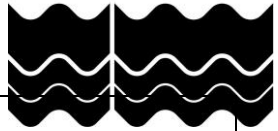
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Race/ethnicity Including migrants, refugees and asylum seekers	All people in the accommodation are reported to be white British.	Staff have confirmed that all people in the accommodation are white British.	There is no impact from the data provided. For new people accessing the service, race and ethnicity would not be a barrier. People would be proactively supported to ensure needs relating to race, ethnicity and culture are met effectively.	No identified actions in this area.
Religion or belief	Due to communication issues experienced by the current people in the services it is difficult to fully ascertain people's religious beliefs.	The provider supports a number of people to access places of worship, and this is based on known individual needs and preferences. This is established as part of routine care planning and those with specific requirements are supported to ensure known needs are met.	People are supported to attend places of worship. This is based on individual need and would be encouraged for any new tenants accessing the property.	People are currently supported to access church and places of worship. The supported living model will enable people to have designated 1-1 support time to use as they or their representatives chose. This will further enhance people's ability to direct their care including support to meet their needs in this area.



Protected characteristics groups under the Equality Act 2010	What do you know? Summary of data about your service-users and/or staff	What do people tell you? Summary of service-user and/or staff feedback	What does this mean? Impacts identified from data and feedback (actual and potential)	What can you do? All potential actions to: <ul style="list-style-type: none"> • advance equality of opportunity, • eliminate discrimination, and • foster good relations
Sex/Gender	<p>Beckley Close 2 females and 3 males</p> <p>Jasmine Lodge 3 females and 2 males</p>	There is currently a mix of males and females in the placement.	<p>There is no impact on people based on their sex/gender.</p> <p>The current mix of male and females will support future placements to ensure that the service is able to meet the needs of all people regardless of Gender</p>	No identified actions in this area.
Sexual orientation	Based on individual's ability to communicate their needs and wishes, alongside the staff teams knowledge of the clients, we are unable to fully ascertain the current people's sexual orientation.	Staff that know the people well are unable to identify individuals that require specific support in this area. The people living in the service have learning disabilities that may limit their ability to effectively communicate their sexual orientation to those who support them.	A person's sexual orientation would not be a preventative factor for current or future people using the service. The current care provider has a range of policies to tackle discrimination including those based around sexual orientation.	The current provider has a range of policies in place to ensure that people's sexual orientation would not be a prohibitive factor for new or existing people using the service or taking up a tenancy.



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Marriage and civil partnership	None of the current people are married or in a civil partnership.	Information provided by the care provider indicates that it is unlikely that people supported would enter marriage or civil partnerships.	No negative impact identified. It is widely acknowledged that people with Learning Disabilities are significantly less likely to marry. A person's accommodation can also have an impact on people's ability to engage and develop meaningful relationships/partnerships. Moving to a Supported Living model will enable people to be supported to have a greater level of control over their support. This could include targeted support to engage and maintain relationships that could lead to marriage and Civil Partnerships. They will also have security of their own tenancy to invite	Tenants who wish to enter into marriage and civil partnerships will be supported to do so providing they have capacity to make this decision.



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			<p>guests and partners to stay.</p> <p>This will support new and existing tenants and may enhance the ability to experience relationships in line with their legal rights to marry or form partnerships.</p>	
Impacts on community cohesion	People covered in this assessment engage with their local communities and have been part of the community for many years.		<p>Works undertaken on the building to enable the refurbishment should have limited impact on the local neighbourhood.</p> <p>The Supported Living model aims to enhance people's access to local groups and encourage active participation in their community.</p>	The landlord/housing provider informed properties in the immediate vicinity that building works would be taking place and no concerns have been raised during the construction of Beckley Close. This will also be monitored for Jasmine Lodge and any concerns shared.



Additional categories

(identified locally as potentially causing / worsening inequality)

Characteristic	What do you know?	What do people tell you?	What does this mean?	What can you do?
Rurality	No negative impact. All people are supported to access the community both locally and further afield.	No impact identified.	No impact	NA
Carers	Consultation with individuals' families and representatives has commenced and people have been informed of the proposals, agreements reached and how they can raise concerns. Main considerations could include concerns relating to temporary moves for individuals and what the support will look like going forward. The ongoing communication process has enabled people to be involved in decision making and will inform the support that is put in place to alleviate concerns they may have. There will also be ongoing opportunities	Families of the individuals have been informed in writing with details of who to contact if they have concerns. To date there have been two enquiries made that relate to concerns around the people supported ability to return to the property once the works are complete. One person also wanted reassurance that the development would benefit the individual. Communication will continue throughout the project and families will be update and have the	Where possible, people will be supported to remain in the local area to enable contact with important people in their lives.	Communication with family and friends supported decision making about location of temporary moves for individuals. This approach was implemented across the temporary moves for both Beckley Close and Jasmine Lodge when matching clients to temporary alternative provision, consideration was given to support staff, specifically ensuring they were supporters that clients were familiar with. This involved ensuring that staff were able to relocate logistically, whilst still attempting to match clients with the staff they have the best relationship wherever possible to offer continuity and familiarity of support. Family and significant others have been kept up to date both verbally and



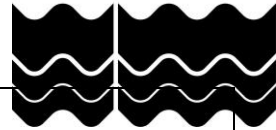
Characteristic	What do you know?	What do people tell you?	What does this mean?	What can you do?
	to discuss the potential benefits for individuals to offset some of the potential concerns. Regular updates will be given to families, so they are aware of progress throughout the project. Families were made aware that there had been a pause on the works at Beckley Close and were informed when these recommenced. Families and significant others will be kept informed of progress and will be given regular updates for Phase 2 of the project at Jasmine Lodge,	option to feed into the process at regular intervals.		in writing as the project progresses. For clients returning to Beckley Close, family members were given the opportunity to visit the remodelled service prior to their family members moving back. Some family members took this opportunity, and others visited after the moves had taken place, feedback from both of these visits has been very positive, this included – <i>‘they were amazed by the transformation’, ‘they were very impressed with the work that had been carried out’ and ‘family were very happy with his new bedroom and has given us a definite thumbs up for the new home.’</i>
Other groups that may be differently affected (including but not only: homeless people, substance users, care	The remodelling of the service to Supported Living will enhance its offer to care leavers who also have a diagnosed Learning Disability.	Transition leads and the ESCC Brokerage Team tell us that there is a lack of suitable supported living services for care leavers including those leaving foster care. The gap is further widened for those with complex support needs that	Developing the property and changing the current model will enable a wider offer to those not currently able to access the service. This will have a potential future beneficial impact on younger people who	Data collation from the Transition Team supports long term future planning and will further shape the service to meet forecasted needs for those with an LD. Maximising the design potential and usability of the remodelled accommodation by ensuring their accessibility and adaptability allows



Characteristic	What do you know?	What do people tell you?	What does this mean?	What can you do?
leavers – see end note)		require specialist support or adapted properties to meet physical needs.	require services in East Sussex. The ASC Transition Cohort Planning Meetings have identified approximately 15 individuals who are transitioning from Children's service to adults who are forecast to benefit from supported living services over the next 2-3 years. This forecast may increase as new people requiring services are identified.	<p>for upcoming vacancies to be utilised by a wider range of clients, minimising vacancies and making best use of resources.</p> <p>Following the completion of the works to Beckley Close, referrals are already being received for consideration for younger adults.</p>
<p>Assessment of overall impacts and any further recommendations - include assessment of cumulative impacts (where a change in one service/policy/project may have an impact on another)</p>				
<p>The current care and support provider adheres to their internal policies and procedures and has also has a jointly agreed service specification with ESCC that includes clear requirements to ensure that people's protected characteristics defined in the Equalities Act are identified and met. These include (but are not limited to):</p> <ul style="list-style-type: none"> To ensure that equal opportunity principles underpin all its services and actions. Care and support workers are sensitive and responsive to the race, culture, religion, age, disability, gender and sexuality of the Client and their relatives and representatives 				



Characteristic	What do you know?	What do people tell you?	What does this mean?	What can you do?
	<ul style="list-style-type: none"> To value difference and to ensure that services are sensitive to the diversity of need To ensure that Clients are treated with respect and valued as a person and their right to privacy is upheld. To support Clients to form and express close personal relationships. Such relationships should only be questioned if there have been concerns expressed by the Service Provider, the Client's Care Manager, or the Client's Representative about their ability to make an informed choice, and give consent to the relationship in question, in line with the Mental Capacity Act 2005. Have a fair access, fair exit, and equality and inclusion policy that is consistent with requirements of the legislation Have a system to identify, challenge and respond appropriately to incidents of institutional racism and indirect/direct discrimination by any staff member or Client. Have a robust level of training and support available to staff to promote an effective understanding of the cultural and ethnic needs of Clients. <p>The above contractual requirements highlight additional safeguards to ensure that the service considers equality and inclusion when supporting existing and new people accessing the service. Outcomes are measurable and will be monitored through the Key Performance Indicators. Furthermore, the Care Quality Commission will require the provider to give evidence of how people with protected characteristics are met and this will inform the overall inspection rating. This will provide evidence from the regulatory body that due consideration is given to the impact of the support provided to meet the requirements of Equality Act.</p> <p>The proposed change in service model is likely to have a financial benefit to ESCC in terms of ongoing care and support costs met from the community care budget, however significant investment of capital funds is required to undertake the required building and improvement works. People who access supported living services are able to claim a range of welfare benefits including housing benefit that enables individuals to cover their own rent and hotel costs that are currently funded by ESCC as part of a residential care package arrangement. Furthermore, individual support is arranged in a more cost-effective way meaning that individuals retain the appropriate amount of support based on core and individual support hours ensuring maximum cost efficiency.</p> <p>There is tangible benefits to individuals should the service be remodelled. This includes refurbishment of their existing accommodation with the aim of this being appropriate to manage increasing needs in the future. The property will include ensuite bathrooms for some, and for shared bathrooms to be accessed privately from the client's bedrooms. People will be issued tenancies to give security of tenure, control and flexibility relating to support where capacity allows, additional access to welfare benefits, and greater emphasis on individuals</p>			

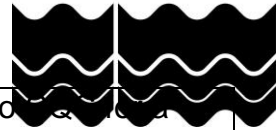


Characteristic	What do you know?	What do people tell you?	What does this mean?	What can you do?
	<p>being involved in decisions about future tenants that move into the property. The properties will also be improved to ensure a homely feel in keeping with a supported living model with a tenancy.</p> <p>Potential negative impacts include temporary moves albeit supported by their current carers who know them well (where possible). People may not be able to secure a tenancy without a person taking this on for them. However, this is mitigated by ensuring appropriate representation and advocacy, and all current people using the service are supported by the ESCC Appointee and Deputy Team (ADT) who can sign tenancies on their behalf. The provider has shared information as part of the pre consultation process and has identified specific individuals that may require specific care and support to make a temporary move manageable. This includes specific environmental considerations as well as those who may require additional emotional support to limit distress where possible. For example, to enable the temporary moves from Beckley Close, specialist equipment was sourced via the OT department and some minor changes were made to the receiving environments such as new floor coverings to enable mobile hoists to be safely used. This considered approach having worked well for adults at Beckley Close was implemented for the people temporarily moving from Jasmine Lodge, where further work was undertaken on an individual basis to fully establish their assessed needs and any mitigations for each individual.</p> <p>Potential long term benefits including stability for current and future clients. Not undertaking the changes could jeopardise the longer-term sustainability of the service in terms of voids resulting in risk that one or more of the services may have to close, as was the case with Cregg Na Ba in 2018, due to increase voids, aging population and the accommodation and model of support not being suitable for the younger cohort of people coming through transitions into adult services.</p> <p>It is anticipated that the structural changes to the building and change in how support is provided will be viewed positively by CQC as the regulator. The regulator has given an early positive reaction to the plans, and further dialogue with CQC will be held by the care provider.</p>			

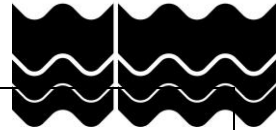


3. List detailed data and/or community feedback that informed your EqIA

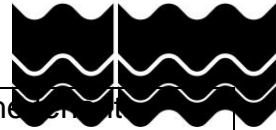
Source and type of data (e.g. research, or direct engagement (interviews), responses to questionnaires, etc.)	Date	Gaps in data	Actions to fill these gaps: who else do you need to engage with? (add these to the Action Plan below, with a timeframe)
<p>Consultation with Affinity Trust (care provider) has formed part of the process. This started at the point of retender for the contract awarded in October 2021. The provider submitted evidence relating to how the remodelling could be undertaken by the organisation based on previous experience and successes.</p> <p>Consultation relating to the needs of individuals has been considered by Affinity Trust in consultation with the CLDT.</p> <p>Fortnightly Planning meetings were held with Affinity Trust and commissioning, and where appropriate this has also included reps from the Specialist Brokerage Team and the CLDT. Affinity Trust have been involved with plans for developments, the proposal for a change in delivery of support and the process of reviewing draft building plans for the services identified.</p>		<p>Affinity Trust have provided information that identifies how temporary accommodation changes will be supported by the organisation based on previous experience. This includes:</p> <p>“When we consider any potential moves, we would meet with the managers/ staff who know the people well. We draw up tables that show friendship group matches, any behaviours that might clash with others, ability for families to still visit, correct equipment in each location to meet the needs, the right staff to be able to support and who could be transferred”.</p> <p>This work has progressed, and Affinity Trust identified individuals at Beckley Close who would be suitable for the current vacancies in their existing services. This information was reviewed by the CLDT, Commissioning Team and OT Department to enable a multiagency proposal that was then shared with the people supported, families and</p>	<p>Consultation and joint work with Affinity Trust will continue throughout the process. Affinity Trust will support the CLDT and Commissioning Team with the wider consultation process. This will include direct and targeted work to engage the people who live in the service alongside their families or advocates.</p> <p>As previously stated, the LD Commissioning Team have discussed the need for formal advocacy support with the Senior Commissioning Manager (Mental Health) who has oversight of the Advocacy contract for ASC. Support to access advocacy is available and was initiated for two people who live at Beckley Close to support with the temporary move process. This will be further explored for the people at Jasmine Lodge as the project progresses to phase two.</p>



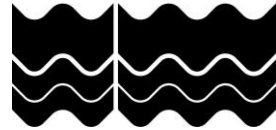
		<p>advocates prior to being finalised and temporary moves taking place.</p> <p>Affinity Trust will engage with the Care Quality Commission regarding the change in service model.</p>	<p>Affinity Trust will apply to CQC for a change in regulated support. Feedback from CQC may inform the consultation process.</p>
<p>Parents and important family members have received letters that outline the changes and agreements reached. They have been given the opportunity to contact Affinity Trust and the Strategic Commissioning Manager for wider discussion and to raise any concerns. There has been minimal contact from families, and those who have contacted have been most concerned about their family member being unable to return following the development. Some families have had sight of the draft building plans (at request from the families) and people have been reassured that people will be able to return home once the works are completed. Communication with families will remain in place, with the option to review the finalised building plans in more detail once they are in final draft.</p>		<p>Task and Finish groups have been established including representatives from Affinity Trust, Commissioning, CLDT and ADT to initiate the wider communication and involvement process as the project develops. Additional support was sought from health professionals based on identified needs, including the return to Beckley Close, and to support the temporary moves from Jasmine Lodge. Communication with people supported and their families, with support of advocacy, will also be central to this process.</p>	<p>Additional people may be added to the Task and Finish group as information and feedback is received. The consultation processes will shape the EqlA and all relevant feedback will be considered.</p>
<p>Transition cohort meetings and LD Housing panels are held on a regular basis and the proposed plans have been discussed in these meetings.</p>		<p>Discussions will continue throughout the life span of the project and any additional information that assists the</p>	<p>Regular meetings will continue.</p>



Views have been shared in relation to future needs for young people coming through transition and clear evidence has been provided to confirm that that the change in service model would be beneficial for younger people requiring services over the coming years.		development of the service will be considered.	
The CLDT are in support of the development and have completed work relating to individual needs and how these could be met within the new model. The CLDT have also been consulted on geographical areas that are a priority as well as providing information that relates to individuals protected characteristics. People supported have received easy read letters that detail the proposals for the re modelling of the accommodation as well as informing them that they will be required to relocate to a new service whilst works are completed and that they will be involved in decision making where practicable.		Affinity Trust and the CLDT will be actively supporting the ongoing consultation process. There will be additional work needed relating to engagement with individuals including needs assessments and Mental Capacity Assessments. Best Interest decisions will also be needed as part of the process.	Ongoing consultation to continue and EqlA updated at appropriate intervals. The EqlA will be reviewed when we are preparing for people to return to Beckley Close and the temporary moves from Jasmine are arranged (both have taken place and review completed).
ESCC Property Services Department have developed plans for the properties in line with the project brief. The plans have been created to maximise the existing properties to meet the new model of support. This has included engaging with commissioning and Affinity Trust to		Properties will continue to support the building plans for phase 2, and individual people's needs will form part of this process. This may result in amendments being made to the plans throughout the building design phase at Jasmine Lodge. There is a potential that not all client's individual needs can be met within the	To reduce risks in this area, ESCC Occupational Therapy Team have been engaged throughout the design process to ensure that each person's individual needs are considered. This has been successful for the returns to Beckley Close and has enabled the



identify the most suitable properties for development and enable individuals needs to be included in the plans.		developments (this is considered to be low risk), however, this is something that will be identified early and will inform the consultation process.	service to better meet the needs when they returned.
<p>Legalities relating to the proposed introduction of tenancies for the current people that use the service has been discussed in length.</p> <p>National and local policy – e.g. Building the right support; REACH standards for supported living have also been central to plans being explored.</p>		ESCC Appointee and Deputy Team (ADT) support all of the current people in the service. Early engagement has commenced, and ADT have confirmed that they will be able to sign tenancies on people's behalf (if required) and complete appropriate benefit applications to support this area.	ADT are included in the project plan to ensure that this work is undertaken as appropriate. Tenancies for Beckley Close are in place.



4. Prioritised Action Plan

NB: These actions must now be transferred to service or business plans and monitored to ensure they achieve the outcomes identified.

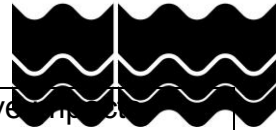
Impact identified and group(s) affected	Action planned	Expected outcome	Measure of success	Timeframe
Greater control over individual's delivery of support	Each person will have an individual care plan detailing the person's needs, wants and aspirations to inform the care and support they received. This will be achieved by engaging clients in creative and flexible ways to ensure that their communication needs are understood and that this does not prevent them from receiving the support in the way that they want and works well for them.	People supported and/or their representatives will have the ability to greater influence the support they receive to best meet their needs. This will be subject to ongoing review by the provider and the care management team to ensure that people can truly direct their own care and support needs regardless of their level of support needs associated with their Learning and physical Disability.	Reviews evidence that people's needs are being met in line with their wishes and aspirations. This is backed up by advocacy and family engagement to support the individuals to communicate in their preferred way.	Prior to change in support commencing then reviewed after 6 weeks, 6 months and annually thereafter.
Identify short term accommodation options whilst building works are completed	For Jasmine Lodge, this is being monitored through OMG meetings and ongoing discussions with the care provider. Needs assessments have been completed for the people at Jasmine	People were provided alternative accommodation for the shortest period possible. Temporary accommodation was identified based on individual needs and was	People are temporarily placed in appropriate alternative accommodation that meets their needs. Client's return to their accommodation as soon as is practicable and safe to do so.	Process started in March 2022 and will be reviewed throughout the duration of the project. We anticipate the project will complete in



	<p>Lodge to identify appropriate accommodation and support. Time spans for works will be communicated to the people in service and their families or advocates.</p> <p>Ensuring the principles and learning from Phase One was applied, the temporary moves have now successfully taken place for the people supported at Jasmine Lodge who have settled comfortably within their temporary homes.</p>	<p>within the current providers existing services. People supported at Jasmine Lodge were informed of the proposal including the need for temporary moves which has taken place and are reported to have settled comfortably within their new temporary homes.</p>	<p>People supported from Beckley Close have now returned as tenants to their new home.</p> <p>Following careful consideration of matching and environmental suitability, people supported from Jasmine Lodge have now moved to alternative temporary homes within the Affinity Trust residential care homes</p> <p>Needs Assessments have been completed by the CLDT for the clients moving temporarily from Jasmine Lodge.</p>	<p>January 2026 when the people supported will return to Jasmine Lodge.</p>
Tenancy sign off	<p>Commence sign off of tenancy agreements alongside the individuals, CLDT, advocates and ADT based on individual need. Communication needs specific to individuals to be considered alongside those who know the people well. Existing</p>	<p>Tenancies to be made available to all current people in the accommodation, in easy read and accessible formats. Ensure that those who lack capacity are not denied the opportunity to benefit from a tenancy based on their mental capacity and</p>	<p>This will be measured by the number of people who successfully secure a tenancy, as well as developing a process and range of tools to support new people with an LD who access the service in the future.</p> <p>Tenants returning to Beckley Close have been issued a</p>	<p>Beckley Close actioned September 2024</p> <p>Jasmine Lodge – January 2026</p>



	<p>tools to be shared such as easy read documents to aid the process.</p> <p>Capacity assessments will be completed/reviewed as part of the process with a focus on capacity relating to accommodation and tenancies.</p>	<p>Learning Disability. ADT will have a key role as they support all current people using the service.</p>	<p>tenancy. The CoP will need to sign these tenancies on behalf of the people supported as full Deputyship is held by ESCC. ADT worked closely with the project group to ensure the appropriate process was followed to arrange the tenancy and ensure access to funds and community benefits.</p>	
<p>Welfare benefit entitlement is established, and applications submitted</p>	<p>All tenants who access the accommodation will be supported to submit the appropriate benefit applications to maximise their income.</p>	<p>All clients who are eligible for benefits will receive them.</p>	<p>People are supported to maximise their income and eligible benefits are in place. The ADT will ensure applications are completed for all community benefits that people supported are entitled to.</p>	<p>Beckley Close actioned September 2024</p> <p>Jasmine Lodge – January 2026</p>
<p>Impact on individuals and identify those who may experience a negative impact as a result of the proposed changes</p>	<p>This will be established as part of the ongoing communication process. Affinity have already completed a desktop exercise to identify those at increased risk. A range</p>	<p>Any risks for individuals will be identified and work will commence to reduce these risks where possible.</p>	<p>People who experience a short-term move are well supported and their physical health and emotional wellbeing is maintained. People supported at Beckley Close have returned to their</p>	<p>This will be subject to ongoing review. Those with an identified risk will be provided additional support and monitoring to reduce</p>



	of assessments have also been completed by the CLDT for those at Beckley Close that has also supported decision making in this area.		newly remodelled home with positive feedback and outcomes reported by the care and support provider. No adverse or negative impact on people supported has been observed.	negative impact where possible.
Future financial viability of the service for existing and new tenants	More people able to access the service thus stabilising it for current and future referrals.	Occupancy likely to increase as the service will be more attractive to younger people or those requesting a more independent living environment.	Occupancy increases and is maintained over the coming years. Referrals already received for younger adults considering Beckley Close as an accommodation option.	Ongoing