

## Equality Impact Analysis Template

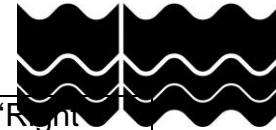
**Equality Impact Analysis (EqIA) (or Equality Impact Assessment) aims to make services and public policy better for all service-users and staff and supports value for money by getting council services right first time.**

We use EqIAs to enable us to consider all relevant information from an Equality requirements perspective when procuring or restructuring a service, or introducing a new policy or strategy. This analysis of impacts is then reflected in the relevant action plan to get the best outcomes for the Council, its staff and service-users.

EqIAs are used to analyse and assess how the Council's work might impact differently on different groups of people. EqIAs help the Council to make good decisions for its service-users, staff and residents and provide evidence that those decision conform with the Council's obligations under the Equality Act 2010.

This template sets out the steps you need to take to complete an EqIA for your project. If you have any questions about your EqIA and/or how to complete this form, please use the contact details at the end of this form.

<b>Title of Project/Service/Policy</b>	Affinity Trust (Beckley Close and Jasmine Lodge) deregistration and change from Residential Care to Supported Living
<b>Team/Department</b>	Learning Disability Commissioning
<b>Directorate</b>	Strategic Commissioning & Supply Management
<b>Provide a comprehensive description of your Project (Service/Policy, etc.) including its Purpose and Scope</b>	<p><b><u>Reviewed and updated on 6<sup>th</sup> July 2022 to reflect changes since original EqIA dated 07/10/21</u></b></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</p>



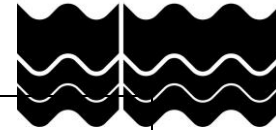
Services, 2015), 'Registering the Right Support' (Care Quality Commission, 2017) and 'Right Support, Right Care, Right Culture (CQC, updated 2021).

Supported living for people with a learning disability are 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.

A supported living model offers more choice and flexibility for the people supported, in terms of people being able to choose who provides their care above core support levels without their tenancy being affected, and allows 1:1 support to be better tailored to individual need and 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, as well as making best use of resources with tailored packages of care and support that can be reduced over time as areas of independence are increased.

Following a recent tender of 5 existing residential care homes in the Hastings and Bexhill area, a proposal has been put forward that one of these properties is reregistered as Supported Living during 2022-2023 with a further property identified for 2023-2024. This will include 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.

The proposal is also 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 less options being available for people requiring support and the need to move out of a service.

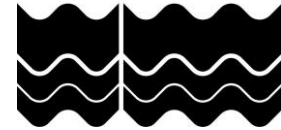


This Equalities Impact Analysis will focus on the two proposed properties. This will include the potential impacts on the individuals who live within the properties, their families (or those important to the individuals) based on known protected equality characteristics, including the potential impact of a temporary move to alternative accommodation whilst building works are completed.

Early consultation with people who use the service, and their families has commenced 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 and there needs to be a greater level of certainty to ensure that any information is both accurate and presented in a way that the people supported can understand. Detailed work regarding potential temporary moves and structural viability of the building plans are underway, and once there is a greater level of certainty this information will be shared more widely, and people's views will be taken into consideration as part of the overall project.

Consultation has taken place with the current provider and the proposed potential to remodel to Supported Living has been included in their recent 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 supported clients and their families when one of their previous residential care homes closed in 2018, and clients were supported to move into their other existing services.

The Community Learning Disability (CLDT) Team 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.



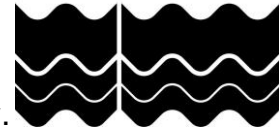
## Initial assessment of whether your project requires an EqIA

When answering these questions, please keep in mind all legally protected equality characteristics (sex/gender, gender reassignment, religion or belief, age, disability, ethnicity/race, sexual orientation, marriage/civil partnership, pregnancy and maternity) of the people actually or potentially receiving and benefiting from the services or the policy.

In particular consider whether there are any potential equality related barriers that people may experience when getting to know about, accessing or receiving the service or the policy to be introduced or changed.

Discuss the results of your Equality assessment with the Equality Lead for your department and agree whether improvements or changes need to be made to any aspect of your Project.

	Question	Yes	No	Don't Know
1	Is there evidence of different needs, experiences, issues or priorities on the basis of the equality characteristics (listed below) in relation to the service or policy/strategy area?	x		
2	Are there any proposed changes in the service/policy that may affect how services are run and/or used or the ways the policy will impact different groups?	x		
3	Are there any proposed changes in the service/policy that may affect service-users/staff/residents directly?	x		
4	Is there potential for, or evidence that, the service/policy may adversely affect inclusiveness or harm good relations between different groups of people?		x	
5	Is there any potential for, or evidence that any part of the service/aspects of the policy could have a direct or indirect discriminatory effect on service-users/staff/residents ?		x	
6	Is there any stakeholder (Council staff, residents, trade unions, service-users, VCSE organisations) concerned about actual, potential, or perceived discrimination/unequal treatment in the service or the Policy on the basis of the equality characteristics set out above that may lead to taking legal action against the Council?		x	
7	Is there any evidence or indication of higher or lower uptake of the service by, or the impact of the policy on, people who share the equality characteristics set out above?	x		Aim is to increase uptake

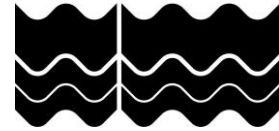


If you have answered “YES” or “DON’T KNOW” to any of the questions above, then the completion of an EqIA is necessary.

The need for an EqIA will depend on:

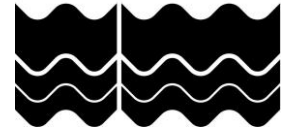
- How many questions you have answered “yes”, or “don’t know” to;
- The likelihood of the Council facing legal action in relation to the effects of service or the policy may have on groups sharing protected characteristics; and
- The likelihood of adverse publicity and reputational damage for the Council.

Low risk	Medium risk	High risk
x		



**1. Update on previous EqlAs and outcomes of previous actions (if applicable)**

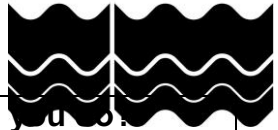
<p><b>What actions did you plan last time?</b> (List them from the previous EqlA)</p>	<p><b>What improved as a result?</b> What outcomes have these actions achieved?</p>	<p><b>What <u>further</u> actions do you need to take?</b> (add these to the Action Plan below)</p>
<p>This document has been updated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



## 2. Review of information, equality analysis and potential actions

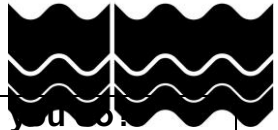
Consider the actual or potential impact of your project (service, or policy) against each of the equality characteristics.

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"> <li>• advance equality of opportunity,</li> <li>• eliminate discrimination, and</li> <li>• foster good relations</li> </ul>
Age	<p><b>Beckley Close</b> Age range from 40 – 66 Av 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><b>Jasmine Lodge</b> Age range from 47-66 Av age 58 40-50=1 50-60=2 60-70=2</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 service to Supported Living will make it more attractive to younger people should voids appear. This will</p>

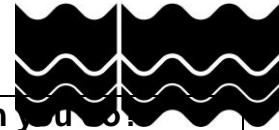


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	People have lived in the service for 1-23 years.			sustain viability of the service in years to come and further develops supported living to meet the needs of a wider group of people.  This project will require the current people in the placement/s to be temporarily moved to alternative accommodation for a period of approximately 6-8 months. The majority of people will be accommodated in other services with the same care provider with staff who know them well, in environments that are suitable for their care needs. The CLDT and commissioning team will remain in contact with the

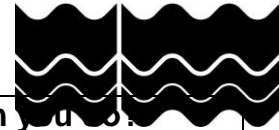




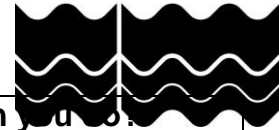
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				<p>provider to review how people are being supported and advocacy will also be involved when people are to return to their original accommodation. The provider has experience of closing a previous residential care home and formed a working party specifically to explore the needs of the individuals to ensure that appropriate accommodation was sourced within existing services. This was successful and all people were rehoused in suitable and appropriate accommodation. A similar process will be used on this occasion with additional support</p>



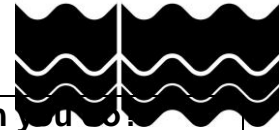
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				from the CLDT, and advocacy services, to ensure safe and effective temporary moves take place to limit the disruption to those involved.
<b>Disability</b>	<b>Beckley Close</b> All 5 people have diagnosed Learning disabilities and additional health/physical needs. All clients use nonverbal methods of communication and rely on people who know them well to ensure that their physical, emotional and communication needs are met. Early indication is that all 5 people are thought to lack capacity to make specific decisions relating to their accommodation.	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 will be required for each individual. As a result, securing detailed and specific feedback may not be achievable for some of the people. However, the clients have resided in this	A change to supported living may present tangible benefits for the current people in placement and future tenants receiving a service. This includes: <ul style="list-style-type: none"> <li>• Being supported to achieve greater control over who supports them and when support is given</li> <li>• Access to a range of welfare benefits to increase financial stability</li> <li>• Security of tenure</li> </ul>	Easy read documentation has been produced to support people to understand tenancies and additional resources will be produced to support communication throughout the process.  People supported have 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



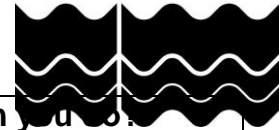
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	<p>This will be formally assessed and if needed, a best interest decision will be made including the views of important people in their lives as well as formal advocacy support if required (IMCA).</p> <p><b>Jasmine Lodge</b>                      All 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 communication needs are met.</p>	<p>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> <p>Ongoing communication with parents and family members will inform further content in this area.</p>	<ul style="list-style-type: none"> <li>• Being supported to be involved as far as possible with choosing who they live with and consultation relating to new tenants</li> <li>• Newly modernised accommodation that meets current and future needs</li> <li>• Continued support from a provider who knows them well and is committed to their welfare</li> </ul> <p>Potential negative impacts could include:</p> <ul style="list-style-type: none"> <li>• Temporary moves whilst the building is modernised could lead to short term distress or confusion. This will be mitigated by a care</li> </ul>	<p>unclear how many people have been able to understand and retain this information at this point.</p> <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 will be actioned as and when appropriate for individuals. Two of the people supported have existing advocacy support via POhWER.</p>



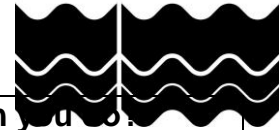
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	<p>2 of the people receiving a service have behaviour that requires specific support to maintain safety.</p> <p>Early indication is that all 5 people are thought to lack capacity to make specific decisions relating to their accommodation. This will 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).</p>		<p>provider and staff who know the people well.</p> <ul style="list-style-type: none"> <li>• 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 that limits disruption to those individuals.</li> </ul>	<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 it changes to supported living, and this care provider has supported current clients for the last ten years, so have a good understanding of their care needs.</p> <p>Capacity assessments and best interest decisions will form part of the process. Due consideration will be given at review to establish if the clients would benefit from</p>



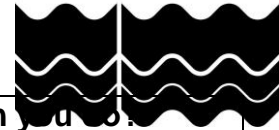
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				remaining in the temporary accommodation (placement made permanent) if there are tangible identified benefits to the individual, or if it is identified that returning to the previous accommodation may be more distressing than remaining in the short-term accommodation.  To facilitate a smooth transition to alternative accommodation, people supported will be enabled to visit and spend time in the new service. This will include introduction visits if this is felt to be beneficial. Furthermore, the existing staff teams will relocate to the new



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				services to provide continuity of care. The people supported will also be engaged in creating story books to increase their understanding of the moves.
<b>Gender reassignment</b>	No communicated impact in this area.	Feedback from care provider and care managers tells us that that this protected characteristic is not applicable for the current people living in the property.	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.
<b>Pregnancy and maternity</b>	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	No perceived impact relating to current people residing in the accommodation.	No specific actions identified in this area.

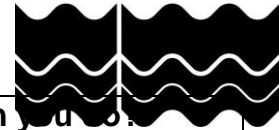


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		learning disabilities, additional communication needs, physical health needs and vulnerabilities that requires intensive support from professional carers.		
<b>Race/ethnicity</b> Including migrants, refugees and asylum seekers	All people in the accommodation 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.	
<b>Religion or belief</b>	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	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

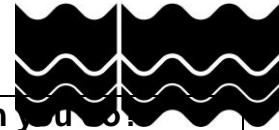


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		routine care planning and those with specific requirements are supported to ensure known needs are met.		their representatives chose. This will further enhance people's ability to direct their care including support to meet their needs in this area.
<b>Sex/Gender</b>	Beckley Close 2 females and 3 males  Jasmine Lodge 3 females and 2 males	There is currently a mix of males and females in the placement.	There is no impact on people based on their sex/gender.  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	No identified actions in this area.
<b>Sexual orientation</b>	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	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	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	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

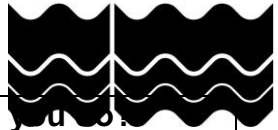




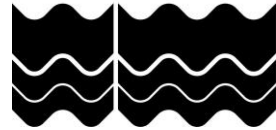
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	people's sexual orientation.	effectively communicate their sexual orientation to those who support them.	including those based around sexual orientation.	using the service or taking up a tenancy.
<b>Marriage and civil partnership</b>	None of the current 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	Tenants who wish to enter into marriage and civil partnerships will be supported to do so providing they have capacity to make this decision.



<b>Protected characteristics groups under the Equality Act 2010</b>	<b>What do you know?</b> Summary of data about your service-users and/or staff	<b>What do people tell you?</b> Summary of service-user and/or staff feedback	<b>What does this mean?</b> Impacts identified from data and feedback (actual and potential)	<b>What can you do?</b> All potential actions to: <ul style="list-style-type: none"> <li>• advance equality of opportunity,</li> <li>• eliminate discrimination, and</li> <li>• foster good relations</li> </ul>
			<p>relationships that could lead to marriage and Civil Partnerships. They will also have security of their own tenancy to invite 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>	
<b>Impacts on community cohesion</b>	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</p>	The landlord/housing provider will inform properties in the immediate vicinity that building works will be taking place. Further discussions are taking place regarding the need for wider community communication



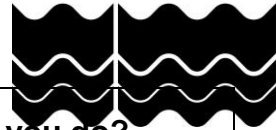
<b>Protected characteristics groups under the Equality Act 2010</b>	<b>What do you know?</b> Summary of data about your service-users and/or staff	<b>What do people tell you?</b> Summary of service-user and/or staff feedback	<b>What does this mean?</b> Impacts identified from data and feedback (actual and potential)	<b>What can you do?</b> All potential actions to: <ul style="list-style-type: none"> <li>• advance equality of opportunity,</li> <li>• eliminate discrimination, and</li> <li>• foster good relations</li> </ul>
			active participation in their community.	proportionate to the level of building work undertaken.



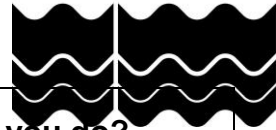
**Additional categories**

(identified locally as potentially causing / worsening inequality)

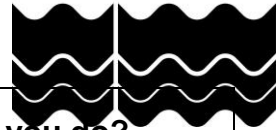
Characteristic	What do you know?	What do people tell you?	What does this mean?	What can you do?
<b>Rurality</b>	No negative impact. All people are supported to access the community both locally and further afield.	No impact identified.	No impact	NA
<b>Carers</b>	Early Consultation with individuals' families 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 will enable people to be involved in decision making and will inform the support that is put in place to alleviate concerns they may have.	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 option to feed into 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 will support decision making about location of temporary moves for individuals.



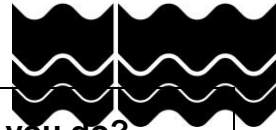
Characteristic	What do you know?	What do people tell you?	What does this mean?	What can you do?
	<p>There will also be an opportunity to discuss the potential benefits for individuals to offset some of the potential concerns. Building plans will also be shared once final drafts (including structural viability) have been completed.</p>	<p>process at regular intervals.</p>		
<p><b>Other groups that may be differently affected</b> (including but not only: homeless people, substance users, care leavers)</p>	<p>The remodelling of the service to Supported Living will enhance its offer to care leavers who also have a diagnosed Learning Disability.</p>	<p>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 require specialist support or adapted properties to meet physical needs.</p>	<p>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 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</p>	<p>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.</p>



Characteristic	What do you know?	What do people tell you?	What does this mean?	What can you do?
			to benefit from supported living services over the next 2-3 years. This forecast may increase as new people requiring services are identified.	
<p><b>Assessment of overall impacts and any further recommendations</b> - 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 Equality Act are identified and met. These include (but are not limited to):</p> <ul style="list-style-type: none"> <li>• 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 sexual orientation of the Client and their relatives and representatives</li> <li>• To value difference and to ensure that services are sensitive to the diversity of need</li> <li>• To ensure that Clients are treated with respect and valued as a person and their right to privacy is upheld.</li> <li>• 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.</li> <li>• Have a fair access, fair exit, and equality and inclusion policy that is consistent with requirements of the legislation</li> <li>• Have a system to identify, challenge and respond appropriately to incidents of institutional racism and indirect/direct discrimination by any staff member or Client.</li> <li>• Have a robust level of training and support available to staff to promote an effective understanding of the cultural and ethnic needs of Clients.</li> </ul> <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</p>				



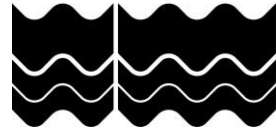
Characteristic	What do you know?	What do people tell you?	What does this mean?	What can you do?
<p>protected characteristics are met and this will inform the overall inspection rating. This will provide evidence from the regulatory body that due consideration is given to the impact of the support provided 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 are 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 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. Once the impact of potential moves are known, further work will be undertaken on an individual basis to fully establish the needs and mitigators 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</p>				



Characteristic	What do you know?	What do people tell you?	What does this mean?	What can you do?
<p>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>CQC will need to agree a change in registration for the service to be recognised as supported living. It is anticipated that the structural changes to the building and change in how support is provided will be viewed positively by the regulator. The regulator has given an early positive reaction to the plans, and further dialogue with CQC will be held.</p>				

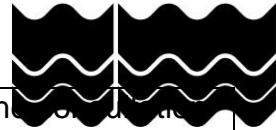
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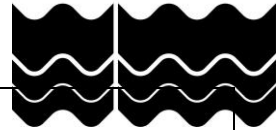


### 3. List detailed data and/or community feedback that informed your EqIA

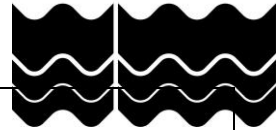
Source and type of data (e.g. research, or direct engagement (interviews), responses to questionnaires, etc.)	Date	Gaps in data	Actions to fill these gaps: who else do you need to engage with? (add these to the Action Plan below, with a timeframe)
<p>Consultation with Affinity Trust (care provider) has formed part of the process. This started at the point of tender 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. This requires formal consultation once individuals are identified, and proposals agreed.</p> <p>Fortnightly Planning meetings have been 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</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 started, and Affinity Trust have identified individuals who would be suitable for the current vacancies in their existing services. This information is being reviewed by the CLDT, Commissioning Team and OT Department to enable a multiagency proposal that will then be shared with the</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 will be actioned as and when appropriate for individuals. Two of the people supported have existing advocacy support via POhWER.</p> <p>Affinity Trust will apply to CQC for a change in regulated support. Feedback</p>



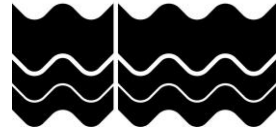
<p>reviewing draft building plans for the services identified.</p>		<p>people supported, families and advocates prior to being finalised.</p> <p>Affinity Trust will engage with the Care Quality Commission regarding the change in service model.</p>	<p>from CQC may inform the process.</p>
<p>Parents and 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>A Task and Finish group will be established including representatives from Affinity Trust, Commissioning, CLDT and ADT to initiate the wider communication and involvement process once there is certainty about the building plans and potential temporary moves for individuals. This may require additional support from SaLT and other appropriate health specialists. 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 EqIA 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>



<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.</p>		<p>development of the service will be considered.</p>	
<p>The CLDT are in support of the proposal 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. Discussions have also taken place regarding the appropriateness of starting a full consultation with people prior to agreements relating to the temporary moves have been formalised. However, 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.</p>	<p style="text-align: center; font-size: 48px; opacity: 0.2;">DRAFT</p>	<p>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 full needs assessments and Mental Capacity Assessments. Best Interest decisions may also be needed as part of the process.</p>	<p>Ongoing consultation to continue and EqlA updated once individual services and people are identified for temporary moves, and the building plans are in final draft and ready to share. This will also include Affinity Trust, Commissioning, Advocacy (IMCA) and appropriate health professionals who support the individuals.</p>



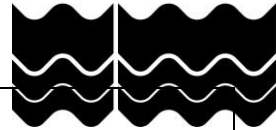
<p>ESCC Property Services Department have initiated draft plans for the properties in line with the project brief. The plans have been created to maximise the existing properties to meet the new model of support. This has included engaging with commissioning and Affinity Trust to identify the most suitable properties for development and enable individuals needs to be included in the draft plans.</p>		<p>Properties will continue to support the building plans and individual people's needs will form part of this process. This may result in amendments being made to the plans throughout the initial building design phase. There is a potential that not all client's individual needs can be met within the developments (this is considered to be low risk), however, this is something that will be identified early and will inform the consultation process.</p>	<p>To reduce risks in this area, ESCC Occupational Therapy Team are engaging in the early design process to ensure that each person's individual needs will be considered.</p>
<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>		<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 peoples behalf (if required) and complete appropriate benefit applications to support this area.</p>	<p>ADT will be included in the project plan to ensure that this work is undertaken as appropriate.</p>



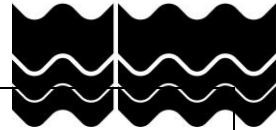
#### 4. Prioritised Action Plan

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

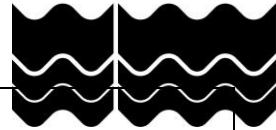
Impact identified and group(s) affected	Action planned	Expected outcome	Measure of success	Timeframe
<p><b>Greater control over individual's delivery of support</b></p>	<p>Each person will have an individual care plan detailing the person's needs, wants and aspirations to inform the care and support 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.</p>	<p>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.</p>	<p>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.</p>	<p>Prior to change in support commencing then reviewed after 6 weeks, 6 months and annually thereafter.</p>
<p><b>Identify short term accommodation options whilst building works are completed</b></p>	<p>Needs assessments to be completed to identify appropriate accommodation and support. Time spans for works to be established and communicated to the people in service and</p>	<p>People will be provided alternative accommodation for the shortest time period possible. Temporary accommodation will be identified based on individual needs and may</p>	<p>People are temporarily placed in appropriate alternative accommodation that meets their needs. Client's return to their accommodation as soon</p>	<p>Process to start March 2022.</p>



	<p>their families or advocates.</p> <p>Further consideration will be needed to look at the individual impact on each person. This will include likely distress or anxiety caused by a temporary move and how this can be reduced whilst ensuring continuity of care and support.</p>	<p>be within the current providers existing services or in a location supported by current staff that they know well. People supported have been informed of the proposal including the need for temporary moves. It is unclear if this information is understood or retained by each individual. Once temporary accommodation has been identified people will be supported to have regular visits to the property to familiarise themselves with the environment, staff, and house mates to enable visual reference to support their understanding of the proposed change.</p>	<p>as is practicable and safe to do so.</p>	
<p><b>Tenancy sign off</b></p>	<p>Commence sign off of tenancy agreements alongside the individuals, CLDT, advocates and ADT based on individual need. Communication</p>	<p>Tenancies to be made available to all current people in the accommodation, in easy read and accessible formats. Ensure that</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</p>	<p>Once the service is operational.</p>



	<p>needs specific to individuals to be considered alongside those who know the people well. Existing tools to be shared such as easy read documents to aid the process.</p> <p>Capacity assessments will be completed as part of the process with a focus on capacity relating to accommodation and tenancies.</p>	<p>those who lack capacity are not denied the opportunity to benefit from a tenancy based on their mental capacity and Learning Disability. ADT will have a key role as they support all current people using the service.</p>	<p>new people with an LD who access the service in the future.</p>	
<p><b>Welfare benefit entitlement is established, and applications submitted</b></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.</p>	<p>Once the service is operational.</p>
<p><b>Impact on individuals and identify those who may experience a negative impact as a result of the proposed changes</b></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.</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.</p>	<p>This will be subject to ongoing review. Those with an identified risk will be provided additional support and monitoring to reduce negative impacts where possible.</p>
<p><b>Future financial viability of the service for existing and new tenants</b></p>	<p>More people able to access the service thus stabilising it for current and future referrals.</p>	<p>Occupancy likely to increase as the service will be more attractive to younger people or those</p>	<p>Occupancy increases and is maintained over the coming years.</p>	<p>Ongoing</p>



		requesting a more independent living environment.		
<b>(Add more rows as needed)</b>				

**EqIA sign-off:** (for the EqIA to be final an email must be sent from the relevant people agreeing it, or this section must be signed)

**Staff member competing Equality Impact Analysis: Matt Holmes, Project Manager, Learning Disability Commissioning**  
Date: 10/11/2021

**Directorate Management Team rep or Head of Service: Paul Hussey**

**Date: 30 November 2022**

**Equality lead: Kaveri Sharma**

**Date: 29 November 2022**

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