



London Borough of Hammersmith & Fulham

**Cabinet 14 July 2014**

## **Equality Impact Assessments**

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## LBHF Equality Impact Analysis Tool

### Conducting an Equality Impact Analysis

An EqIA is an improvement process which helps to determine whether our policies, practices, or new proposals will impact on, or affect different groups or communities. It enables officers to assess whether the impacts are positive, negative or unlikely to have a significant impact on each of the protected characteristic groups.

The tool has been updated to reflect the new public sector equality duty (PSED). The Duty highlights three areas in which public bodies must show compliance. It states that a public authority must, in the exercise of its functions, have due regard to the need to:

- 1. Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited under this Act;**
- 2. Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;**
- 3. Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.**

Whilst working on your Equality Impact Assessment, you must analyse your proposal against the three tenets of the Equality Duty.

## General points

1. In the case of matters such as service closures or reductions, considerable thought will need to be given to any potential equality impacts. Case law has established that due regard cannot be demonstrated after the decision has been taken. Your EIA should be considered at the outset and throughout the development of your proposal, it should demonstrably inform the decision, and be made available when the decision is recommended.
2. Wherever appropriate, the outcome of the EIA should be summarised in the Cabinet/Cabinet Member report and equalities issues dealt with and cross referenced as appropriate within the report.
3. Equalities duties are fertile ground for litigation and a failure to deal with them properly can result in considerable delay, expense and reputational damage.
4. Where dealing with obvious equalities issues e.g. changing services to disabled people/children, take care not to lose sight of other less obvious issues for other protected groups.
5. If you already know that your decision is likely to be of high relevance to equality and/or be of high public interest, you should contact the Equality Officer for support.
6. Further advice and guidance can be accessed from the separate guidance document (link), as well as from the Opportunities Manager: [PEIA@lbhf.gov.uk](mailto:PEIA@lbhf.gov.uk) or ext 3430

## LBHF Equality Impact Analysis Tool

Overall Information	Details of Full Equality Impact Analysis
Financial Year and Quarter	2014/ 2015
Name and details of policy, strategy, function, project, activity, or programme	<p>Title of EIA: <b>Future of Coverdale Road Residential Care Home</b> (new)</p> <p><b>Summary:</b> The consultation on the future of Coverdale Road residential care home for people with learning disabilities forms part of the <i>Hammersmith and Fulham Learning Disability Housing and Support Strategy</i>. This involves a review of current learning disability housing including in house Adult Social Care Services to ensure they are compatible with current and future needs. The Strategy was agreed by July 2013 Cabinet. Cabinet also agreed that a consultation on the future of Coverdale Road should take place. Currently there is an over reliance on residential care models and older supported housing schemes and an insufficient supply and range of suitable housing, support and care options to meet the needs of people with learning disabilities, particularly those with complex and challenging needs.</p> <p>The building at 2 Coverdale Road is owned by the Council and used as a care home service for people with learning disabilities. A report to June 2014 Cabinet will feedback the outcome of the consultation on the future of Coverdale Road and make recommendations.</p> <p>Recent needs analyses have indicated that people with learning disabilities are living longer and have more complex needs including physical needs. By 2030 there are likely to be substantial increases in the percentage of older people with learning disabilities . Older people with learning disabilities are increasingly being supported in Older People’s Extra Care Accommodation but there is a lack of well-designed accommodation which specifically meets the needs of Older People with a learning disability.</p> <p>According to the PANSI website (Projecting Adult Needs and Service Information) within the 50+ age range nationally, there will be very marked increases in both the numbers of people with learning disabilities known to learning disability services (28% over the decade 2001-2011, 48% over the two decades 2001-2021). This factor would add to the requirement for well-designed accommodation to meet the needs of older people.</p> <p>The accommodation strategy for people with learning disabilities in the borough is currently under consultation.</p> <ul style="list-style-type: none"> <li>• In Hammersmith and Fulham there are currently 357 people aged 18+ with a learning disability on the register held by the <i>Hammersmith and Fulham Adults with Learning Disabilities Service</i>; approximately 8% (27 people) are 65 years plus. The mobility of older individuals would need to be considered.</li> </ul>

- Of the 357 there are 35 people aged 18-64 who are formally recognised as having autistic spectrum disorder. There are also 33 people aged 18-64 who have challenging behaviours. People with autistic spectrum disorders and challenging behaviours benefit from a spacious well planned environment where they can have quiet time and personal space.
- There are about 50 people under the age of 18 with a learning disability. Of these there are 15 people from the age of 16-18 transitioning into adulthood and services who have complex or profound learning disabilities. These individuals would benefit from a well-planned environment where they could have quiet time and personal space.

The accommodation strategy currently being consulted on is addressing these needs and population issues.

Regarding the six existing service users; the cabinet report seeks permission to assess them for alternative placements and seeks to provide care and support services in alternative locations. Although the assessment options have not been identified as yet it is certain there will be no withdrawal of services to the six individuals. Also Hammersmith and Fulham does commission alternative in borough care home providers; for example a contract with Yarrow for 10 care homes in similar street style houses - and another 2 Yarrow care homes provided under spot contract in nearby locations. The borough also commissions 4 extra care sheltered services for older peoples, which are all fully accessible services in nearby locations.

Two public meeting have been held for stakeholders and interested parties in the community. Individual meetings have also been held with service users parents and carers to record their views. An independent facilitator has been appointed to record the views of service users. The consultation has highlighted a number of factors;

- Some service users, parents, carers, and families have concerns about the number and type of in borough care and support alternatives, what would be offered to meet the needs of service users.
- Some service users parents and carers are concerned about the disruption to the care and support of those living at at Coverdale Road.
- Some parents and carers are concerned that the decision has already been made and that closure is not in the best interest of the service users.

If the decision of the Cabinet is to close the service this will be mitigated by the Hammersmith and Fulham Adults with Learning Disabilities Service (social work team) working closely with the service users parents and carers on suitable alternative placements. The home would not close until this work was complete and all six service users are

	<p>suitably placed in care and support accommodation which better meets their needs.</p> <p>Initial assessment of the six service users has indicated that three would benefit from an alternative service provision more suitable to their needs.</p> <p>If the decision of the cabinet is to close the service ASC Provided Services are seeking authority to carry out a consultation with staff on a reorganisation proposal to delete 8 Coverdale Road posts (5 currently filled). Human Resources and trade unions will be involved for the outset.</p>
<b>Lead Officer</b>	<p>Name: Christine Baker  Position: Service Manager Provider Services  Email: christine.baker @lbhf.gov.uk  Telephone No: 020 8753 1447 07795506347</p>
<b>Date of completion of final EIA</b>	16/1/2014

<b>Section 02</b>	<b>Scoping of Full EIA</b>		
<b>Plan for completion</b>	<p>Timing: A consultation on the Future of Coverdale Road residential care home for People with learning disabilities will run from 21<sup>st</sup> October 2013 to 20<sup>th</sup> April 2014. Recommendations from the consultation will be presented to Cabinet on the 23<sup>rd</sup> June 2014.</p> <p>Resources: Coverdale Road Project Team</p>		
<b>Analyse the impact of the policy, strategy, function, project, activity, or programme</b>	Analyse the impact of the policy on the protected characteristics (including where people / groups may appear in more than one protected characteristic). You should use this to determine whether the policy will have a positive, neutral or negative impact on equality, giving due regard to relevance and proportionality.		
	<b>Protected characteristic</b>	<b>Analysis</b>	<b>Impact:</b> Positive, Negative, Neutral
	Age	The current care home at Coverdale Road is unsuitable for people with learning disabilities who are ageing due to the number of steep stairs and lack of walk in showers. Other potential placement options in either extra care sheltered or in other more accessible care homes could benefit some of the service users who are ageing.	Positive

Disability	The current care home at Coverdale Road is unsuitable for people with learning disabilities involving complex needs, such as physical disabilities, sensory needs, some types of autism, and challenging behaviour. A recent needs assessment has identified that these types of complex needs represent the emerging needs for people with learning disabilities in the borough. The building is unsuitable for those with challenging behaviour as the corridors and stairways are narrow which can make getting service users to a safe space difficult when incidents happen. Other potential placement options in buildings which have been purpose built and are accessible for people with disabilities would offer a safer environment	Positive
Gender reassignment	There is no impact on this group	Neutral
Marriage and Civil Partnership	There is no impact on this group	Neutral
Pregnancy and maternity	There is no impact on this group	Neutral
Race	There is no impact on this group	Neutral
Religion/belief (including non-belief)	There is no impact on this group	Neutral
Sex	The care home at Coverdale Road does not have en suite bathrooms for people with learning disabilities which means service users of both sexes they need to share communal bathrooms and toilets. It can be challenging at times to maintain privacy for both sexes. Potential alternative placements with en suite facilities would improve this situation	Positive
Sexual Orientation	There is no impact on this group	Neutral

#### Human Rights or Children's Rights

If your decision has the potential to affect Human Rights or Children's Rights, please contact your Equality Lead for advice

	<p>Will it affect Human Rights, as defined by the Human Rights Act 1998? No</p> <p>Will it affect Children's Rights, as defined by the UNCRC (1992)? No</p>
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<b>Section 03</b>	<b>Analysis of relevant data</b> Examples of data can range from census data to customer satisfaction surveys. Data should involve specialist data and information and where possible, be disaggregated by different equality strands.
<b>Documents and data reviewed</b>	Data source: PANSI website (Projecting Adult Needs and Service Information) using LD moderate/severe population projections aged 18 to 64.  <i>Estimating Future Need for Social Care among Adults with Learning Disabilities in England: An Update</i> - Eric Emerson & Chris Hatton
<b>New research</b>	N/A

<b>Section 04</b>	<b>Consultation</b>
<b>Consultation</b>	<p>The proposals in the report regarding the future of 2 Coverdale Road are the subject of a 3 month consultation process from 21st October 2013 to the 20<sup>th</sup> April 2014. This has involved service users, parents carers, trade unions and stakeholders within the community. The evidence from the consultation has been reported to a project board comprising of senior officers and other key stakeholders which has provided governance, tracked progress, considered feedback, and made recommendations.</p> <p>A wider consultation is taking place starting October 2013 on the Learning Disability Housing and Support Strategy. This will include a general consultation on the type of housing needed for people with learning disabilities and will include service users, their families and carers, and stakeholders.</p>
<b>Analysis of consultation outcomes</b>	Two public meeting have been held for stakeholders and interested parties in the community. Individual meetings have also been held with service users parents and carers to record their views. An independent facilitator has been appointed to record the views of service users and this has been written up in a consultation report which is available upon request.

<b>Section 05</b>	<b>Analysis of impact and outcomes</b>
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<b>Analysis</b>	<p>The consultation has highlighted a number of factors;</p> <ul style="list-style-type: none"> <li>• Some service users, parents, carers, and families have concerns about the number and type of in borough care and support alternatives, what would be offered to meet the needs of service users.</li> <li>• Some service users parents and carers are concerned about the disruption to the care and support of those living at Coverdale Road.</li> <li>• Some parents and carers are concerned that the decision has already been made and that closure is not in the best interest of the service users.</li> </ul>
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<b>Section 06</b>	<b>Reducing any adverse impacts and recommendations</b>				
<b>Outcome of Analysis</b>	<p>Regarding the six existing service users; the cabinet report seeks permission to assess them for alternative placements and seeks to provide care and support services in alternative locations. The above concerns can be mitigated by Hammersmith and Fulham Adults with Learning Disabilities Service (social work team) liaising closely with the service users parents and carers on options regarding suitable alternative placements. The home would not close until this work was complete and all six service users are suitably placed in care and support accommodation which better meets their needs.</p> <p>Although the assessment options have not been identified as yet it is certain there will be no withdrawal of services to the six individuals. Also Hammersmith and Fulham does commission alternative in borough care home providers; for example a contract with Yarrow for 10 care homes in similar street style houses - and another 2 Yarrow care homes provided under spot contract in nearby locations. The borough also commissions 4 extra care sheltered services for older peoples, which are all fully accessible services in nearby locations.</p> <p>Staff and trade unions will be consulted about any staffing changes resulting from any possible the closure of the service once all of the service users are suitably placed.</p>				

<b>Section 07</b>	<b>Action Plan</b>																
<b>Action Plan</b>	<p>Note: You will only need to use this section if you have identified actions as a result of your analysis</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 15%;">Issue identified</th> <th style="width: 20%;">Action (s) to be taken</th> <th style="width: 15%;">When</th> <th style="width: 15%;">Lead officer and borough</th> <th style="width: 15%;">Expected outcome</th> <th style="width: 20%;">Date added to business/service plan</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>					Issue identified	Action (s) to be taken	When	Lead officer and borough	Expected outcome	Date added to business/service plan						
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<b>Section 08</b>	<b>Agreement, publication and monitoring</b>
<b>Chief Officers' sign-off</b>	Name: Stella Baillie Position: Tri-borough Director, Provided Services, Mental Health Partnerships and Safeguarding for ASC Email: stella.baillie@rbkc.gov.uk Telephone No: 020 7361 2398
<b>Key Decision Report (if relevant)</b>	Date of report to Cabinet/Cabinet Member: 23/ 6 / 2014 Key equalities issues have been included: Yes
<b>Opportunities Manager (where involved)</b>	Name: Carly Fry Position: Opportunities Manager Date advice / guidance given: 14.1.2014 Email: carly.fry@lbhf.gov.uk Telephone No: 020 8753 3430