

Full Equality Impact Assessment Tool

Overall Information	Details of Full Equalities Impact Assessment
Financial Year and	10/11 Q3
Quarter	
Name and details of policy, strategy, function, project,	Merge of day services for older and disabled people and cease use of 147 Stevenage Road as a day centre
activity, or programme	This first project will outline the impact on each of the three day services affected by the proposals (Imperial Wharf, Elgin Resource Centre and Sunberry ILS).
	2. Procurement proposals for Nubian and Shanti day services
	The initial screening tool assessed the impact on the other Fair Access to Care Services day services affected by the procurement proposals (Imperial Wharf, Elgin Resource Centre, Alzheimer's, Options and Ellerslie Road). Only the services at Nubian and Shanti need the full EIA.
Name of Service	Name: Hannah Carmichael
Department	Position: Commissioning Manager
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	Telephone No: 020 8753 5384
Date of completion of final EIA	21 st December 2010

Section 02	Scoping of Full EIA			
Plan for completion	Timing – completion by 21 st December 2010			
	Resources – day services managers, members of the Consultative Forum			

	Lead Officer – Hannah Carmichael (Commissioning Manager)
	Other officers – Kay Fisher (Acting Head of Procurement), Carly Fry (Opportunities Manager)
What is the policy,	1. Merge of day services for older and disabled people and cease use of 147 Stevenage F

strategy, function, project, activity, or programme looking to achieve?

1. Merge of day services for older and disabled people and cease use of 147 Stevenage Road as a day centre

The council currently provides day services for people that, under the Government's Fair Access to Care Services (FACS) guidelines, are eligible for day care. Day services for FACS eligible older and disabled people are currently separate and the proposal is to merge them to create day services for people of all ages. This would mean the service for people with physical disabilities would merge with the two services for older people. The newly merged services would provide both a building based service and a new community access service. The community access service will support people to integrate into the mainstream community through employment, education, leisure and training opportunities. The building based service would be more like a traditional day centre service, but the activities would focus on all ages rather than just older people.

One of the results of this merge is that only two buildings rather than three would be needed to provide the new merged services. Therefore 147 Stevenage Road, which currently provides the service for people with physical disabilities (Sunberry ILS), would cease to operate as a day centre. Given that Sunberry ILS is the primary user of 147 Stevenage Road, if it no longer occupied it, the building would be surplus to the council's requirements and therefore considered for disposal.

All current service users of Sunberry ILS would be able to access the newly merged services at Imperial Wharf and Elgin Resource Centre, the remaining day service buildings. Therefore all current service users would have a continuation of service, albeit in a different location for some. The remaining day service buildings are of a higher standard and have superior facilities to those of 147 Stevenage Road. The newly merged service would also offer a community access service as well as a building based service. It is therefore thought that on the whole those affected by 147 Stevenage Road ceasing to operate as a day centre would benefit from the merge in services.

Although the services will operate from two building rather than three, there will be the same number of staff because the staff from Sunberry ILS would be part of the merge. The staff resource would enable the new services to run with as many (and it is hoped more) service users as across the current three services.

Not only would the merged services be providing day care in higher quality buildings with better facilities, the proposal also promotes equality. Imperial Wharf and Elgin Resource Centre are excellent resources for people with disabilities and this proposal will open up these resources to adults of all ages, rather than the current restriction of an over 55 age group.

2. Procurement proposals for Nubian and Shanti

Nubian and Shanti are day services for Black and Minority Ethnic (BME) older people. They both currently provide services for both FACS eligible service users needing day and preventative services for older people to use as a 'drop-in'. Each service occupies a council owned building — Nubian operates from 50 Commonwealth Avenue on the White City estate and Shanti operates from 89 Askew Road. Both the day care and drop-in elements of each service are provided from within the same building.

As outlined in the accompanying cabinet key decisions report, the day care elements of both services will be part of the day services outsourcing plan. Unlike the other day services, Nubian and Shanti are subject to a full EIA. This is owing to the impact of the day care element of the services potentially being provided by a different provider to that of the preventative element. The impact on equalities would come from the potential issues of two providers sharing a building and ensuring that the needs of the current users continue to be met under any eventuality.

Will the merge of services affect Human Rights, as defined by the Human Rights Act 1998? No

Will the procurement proposals affect Human Rights, as defined by the Human Rights Act 1998? No

For more in-depth assessment of 1 and 2 across all six strands, see section 04 below.

Section 03	Assessment of relevant data and/or undertake research					
Documents and data	The following data and documents have been used to help inform this Equalities Impact Assessment:					
reviewed						
	Single Equalities Scheme					
	The Single Equalities Scheme outlines how the council meets the requirements for all groups protected					
	by discrimination law. It considers the current duties and includes new duties that were expected to					

arise from the Equality Act 2010, which received royal assent in April 2010.

Borough profile 2010 and Census 2001

The above were both considered when looking at the populations of the day services and how these compared to the borough's statistics on the protected groups.

http://www.lbhf.gov.uk/Directory/Council and Democracy/Plans performance and statistics/Statistics and census information/homepage.asp

Section 04	Assess or undertake consultation
Consultation	Merge of day services consultation A 12 week consultation on the merge of day service for older and disabled people was carried out between 23 rd August and 29 th October 2010. The council consulted with service users, their carers and interest groups. Methodologies included a short questionnaire and consultation events. Information and feedback from the consultation were used to inform this EIA and actions (see section 07). More information about the consultation, including full analysis can be found in the accompanying key decisions cabinet report.
	Nubian and Shanti consultation There will be a consultation with Nubian and Shanti about introducing the 'all-age' element to their services. When this consultation takes place it will be in line with council's consultation guidelines.
	EIA consultation There was an attempt to gain feedback about the EIA from service users, carers and interest groups. Two meetings were offered, the first on 10 th December and second on 17 th December. An expected low turn out to the first meeting prompted the attempt to rearrange for the 17 th , but no-one attended. Feedback was received by email from a member of the consultative forum.
Assessment	Merge in day services consultation It emerged from the above consultation that there was a need for the council to ensure an easy transition for the current Sunberry ILS users during the period of change, which the council is putting into place as a result of consultation (see section 07). There was some anxiety about a change in service that many people had been receiving for 20 years or longer. If the proposal to merge the services and close 147 Stevenage Road goes ahead, the new services will not begin until June 2011 at

the earliest. This should allow enough time for the service users to be introduced to their new services and be involved with the service design.

Nubian and Shanti consultation

N/A – to be completed after consultation has taken place.

Section 05	ent of impact and outcomes	
Assessment		
	Race	Merge of day services for older and disabled people and cease use of 147 Stevenage Road as a day centre
		LOW IMPACT - NEUTRAL
		Sunberry ILS:
		Of Sunberry's current 32 service users, 65% are White British or White Irish, 17% are Black or Black British (Caribbean or African) and 0.9% are 'Other'. Imperial Wharf:
		Of Imperial Wharf's current 48 service users, 75% are White British or White Irish, 0.8% are Black or Black British (Caribbean or African) and 24% are 'Other'. Elgin Resource Centre:
		Of Elgin's current 54 service users, 57% are White British or White Irish, 11% are Black or Black British (Caribbean or African) and 32% are 'Other'.
		This is comparable to the general borough population, which is made up of 77.82% White British or White Irish, 11.12% Black or Black British and 2.79% that are 'Other'.
		The newly merged services at Imperial Wharf and Elgin, like the current services, will not discriminate service users on the grounds of race and will offer an inclusive service for people of all ethnic origins. The new services, like the current services, will make every effort to address cultural needs of its users, including dietary requirements and language. The impact on the current service users will be neutral because the service they currently receive maintains the same principles around elimination of unlawful discrimination and

It is unknown at this stage how many of the Sunberry ILS service users will transfer to Imperial Wharf or Elgin, but it is highly unlikely that the ethnic make up will change in either service with any significant affect. The impact on the service and its users will therefore be neutral.

During the consultation about the merge of the services there was no concern raised about the impact on race.

2. Procurement proposals for Nubian and Shanti

LOW/MEDIUM IMPACT

The outsourcing of both Nubian and Shanti could result in new providers for BME day care. The council would expect tender submissions to include detail of how all BME groups would be provided for, taking cultural needs into consideration. There would be an expectation that all providers of day care would positively encourage diversity and a diversity plan would be needed as part of the implementation of a new service.

The impact on BME groups is likely to be positive because as all day services would be reminded of the need to promote diversity, there could be an increase in what BME service users consider suitable for their needs. If more day centres focussed on cultural needs there would be an increase in choice available to BME groups. All day services currently must not discriminate on the grounds of race, but when the services are tendered they would be expected to demonstrate how they would promote diversity to ensure that they could provide for any ethnic group. This would include provision for different languages, celebration of cultural and religious holidays and dietary requirements.

Disability

1. Merge of day services for older and disabled people and cease use of 147 Stevenage Road as a day centre

MEDIUM IMPACT

Sunberry ILS

Sunberry ILS is a day service for adults of all ages with physical disabilities. Therefore 100% of its service users are registered disabled and 82% have mobility problems. The

disabilities of the services users are mostly as a result of brain injury (85%) and some have degenerative conditions such as Multiple Sclerosis and Parkinson's.

Sunberry ILS has provided a supportive, caring environment for its service users, some of whom have been attending the service for 20 years or longer. The staff at Sunberry ILS have also mostly been working for the service for a long time and so are very familiar with the needs of the various service users and what their disabilities require by means of support and understanding.

Current service users:

During the consultation some service users expressed concern about 'losing' the service because they find comfort in the familiarity of the people (staff and other service users) and the building. Although the Imperial Wharf and Elgin buildings are much newer and are considered to have better facilities, there must be understanding about the attachment people have to a service and building that has helped them and their carers manage their disabilities and enjoy their lives.

As a result of consultation, there will be an implementation period during which Sunberry users could visit and spend time at both Imperial Wharf and Elgin, to familiarise themselves and their carers with the new services (see section 07). They would be offered the choice of which service they would like to attend and would also be supported to find alternatives to council-run day services, if that is what they wanted.

During the 12 week consultation the Sunberry service users and carers had the opportunity to attend two meetings regarding the proposal to merge the services and cease using 147 Stevenage Road. At the meetings the participants were reassured that the staff at both Elgin and Imperial Wharf would be fully qualified to meet their care needs and would be trained in all relevant areas prior to the new services starting.

The majority (72%) of service users use community transport to get to and from the service. The location of 147 Stevenage Road is convenient for some Sunberry users, but it is used by people that live in various locations in the borough so for some it takes a long time on community transport to get there and back. For those that live in the north of the borough (48%), Elgin would be a much more convenient location and would require less time on transport. For those in the south of the borough (52%) Imperial Wharf would be the more convenient alternative. However it needs to be considered that some people in the south will prefer Elgin and vice-versa, so transport may take longer for some

people.

There are currently no service users that drive themselves to Sunberry ILS. For those that arrive and leave by car, the parking restrictions at Imperial are such that this could be a difficult transport option for them. There are no disabled parking bays close by and it is currently difficult to gain access to the Imperial Wharf day service via the electric gates. However this access issue is being dealt with by the day services manager and the owners of the building (see section 07). It is hoped that there will soon be improved access into Imperial Wharf for people to be dropped off at the day centre. Parking is available in an underground car park, but there is a charge.

Access to Elgin is very good and those that arrive by car will have plenty of space to be dropped off. There is also a limited availability of free parking for those that may wish to drive to the service.

Both Elgin and Imperial Wharf have better public transport options than 147 Stevenage Road, which is quite cut off from main bus routes and a 25 minute walk from the nearest station. There is a bus stop outside the building, but it is only served twice an hour.

It should be noted that 147 Stevenage Road is located in the Palace Riverside ward, which according to the SES has the lowest rate of registrations of disabled people in the borough.

Potential service users:

The Single Equalities Scheme (SES) indicates that 15% of residents in Hammersmith and Fulham have a disability (roughly 24,000). However of these, the number needing day care would be far less, at around 188¹. Sunberry ILS currently provides for just 32 adults under the age of 65 with disabilities.

This group currently only have the option of Sunberry ILS to meet their day care needs. Under the proposal to merge the service with Imperial and Elgin, people would be offered the choice of two services and during the support planning process they will have the opportunity to look into alternatives to traditional day care. This should have a positive impact on people with physical disabilities because they would have more choice and

¹ The figure of 188 was gained by applying the London rate of people in day care (155 per 100,000) to the 18-64 year old population of H&F

control about how they receive day care.

The new community access strand of the services would benefit those people who have not wanted to attend a traditional day centre. Those who do attend a day centre and would like to try something different would have that choice. The community access service would be designed with the needs of people with physical disabilities in mind, for example consideration for access and transport. The current Sunberry ILS service users would be consulted on the service specification to make sure it meets their needs and is what they would want to purchase with their budgets (see section 07).

It is also hoped that the community access service would create better throughput, which means it should be able to support more people. Throughput would be created because the community access programme would promote independence. Service users with disabilities would be trained to manage independently in the community, such as accessing public transport, communication and life skills.

Imperial Wharf

Imperial Wharf is a day service for adults over the age of 55 that have been assessed as having day care needs. The service has been operating from Imperial Wharf since 2009 and was previously based at 147 Stevenage Road for roughly 6 years and before that at Farm Lane in Fulham. The proposal to merge the day services for older and disabled people will have a positive impact its current service users and potential service users.

Current service users:

Of the current 48 service users, 42% have a registered disability. Those that wish to participate in the new community access service will have the option to do so. Those that wish to use the building based part of the service will also have this option.

Potential service users:

If Imperial Wharf became an all-age service, this would have a positive impact on the borough's residents who are disabled and under the age of 55, because the service would be opened up to them. Disabled service users would benefit from the accessible building and facilities, as well as skilled staff team.

Elgin Resource Centre

Elgin Resource Centre is a day service for adults over the age of 55, the large majority of

	whom have been assessed as having day care needs. The service has been operating from Elgin Close since 2002. The proposal to merge the day services for older and disabled people will have a positive impact on its current service users and potential service users.
	Current service users: Of the current 54 service users, 22% have a registered disability. Those that wish to participate in the new community access service will have the option to do so. Those that wish to use the building based part of the service will also have this option.
	Potential service users: If Elgin Resource Centre became an all-age service, this would have a positive impact on the borough's residents who are disabled and under the age of 55, because the service would be opened up to them. Disabled service users would benefit from the accessible building and facilities, as well as skilled staff team.
	During the consultation there was some confusion that the services would be merged with those for adults with learning disabilities. This was addressed during the consultation and it was made clear that the services were for adults with physical disabilities and those with age-related frailty that have day care needs.
	2. Procurement proposals for Nubian and Shanti
	LOW/MEDIUM IMPACT
	Both Nubian and Shanti currently provide for people that use wheelchairs, so their buildings and facilities would manage an increase in disabled service users. Both services have also been used to providing for people with age-related disabilities and operate a personal care service, so this can continue.
Gender	Merge of day services for older and disabled people and cease use of 147 Stevenage Road as a day centre
	LOW IMPACT - NEUTRAL
	Sunberry ILS:

	Of Cuphermi's current 22 coming upon E00/ are formals and E00/ are male
	Of Sunberry's current 32 service users, 50% are female and 50% are male. Imperial Wharf:
	Of Imperial Wharf's current 48 service users, 77% are female and 23% are male.
	Elgin Resource Centre:
	Of Elgin's current 54 service users, 91% are female and 8% are male.
	As with most adult social care services, the large majority of staff working in all three day services are female. The male service users at Sunberry ILS currently receive care from three female and one male day service workers and the deputy manager of the service is male. The impact of these service users moving to the newly merged services is therefore unlikely to be significant, because the gender of the day service workers they receive care from is unlikely to change.
	Sunberry ILS has an even split of male and female service users, but the other two services have a very uneven split. It is therefore likely that the Sunberry ILS service users would even out this difference and better reflect the borough profile, which would have a positive impact on the services.
	During the consultation about the merge of the services, as with race there was no concern raised about the impact on gender.
	2. Procurement proposals for Nubian and Shanti
	LOW IMPACT
	As with the above day services, it is unlikely that any change to service provider would have an impact on gender.
Age	Merge of day services for older and disabled people and cease use of 147 Stevenage Road as a day centre
	MEDIUM IMPACT
	Sunberry ILS:
	Of Sunberry's current 32 service users, 0.3% are aged 18-30, 75% are aged 31-59 and 22% are aged 60+

Imperial Wharf:

Of Imperial Wharf's current 48 service users, 100% of service users are aged 60+ Elgin Resource Centre:

Of Elgin's current 54 service users, 0.4% are aged 55-59 and 99% are aged 60+

Sunberry ILS

Current service users

The impact on age is likely to have the most effect on those current users that are under the age of 55. There was some concern during the consultation that the Sunberry ILS users would be disadvantaged by using the same day service as older people. However the large majority (78%) of Sunberry service users are aged over 50, so those that are younger are used to mixing with an older age group. The younger service users would benefit from the new community access service, which will be aimed at those that want to participate in education, employment, leisure and training activities in the mainstream community.

The current service users would be consulted on the service design of both the building based and community access service to make sure both services meet the needs of all ages. For example, activities timetables in the building based services would vary so the cultural interests of the younger generation, such as music, were catered for.

Potential service users

As with the impact on disability, the impact on the age of potential services users with disabilities is likely to be positive. The newly merged services would create more opportunities for more disabled people to receive a varied service to meet their day care needs. It is hoped that the new community access service would attract younger people with disabilities who have previously not wanted to participate in traditional day care activity in a building base. The community access service would also help prevent service users from becoming institutionalised, because the emphasis will be on independence and opportunity for integration.

Imperial Wharf

Currently Imperial Wharf's service users are all over the age of 60, so the impact of introducing a younger age group is likely to be noticeable. During the consultation the response to a mixed age group was on the whole welcome, with most people expressing that mixing with younger people would enhance their experience of using a day service.

There was some concern that younger people would have different needs and interests and therefore some activities, for example reminiscence sessions may exclude people under the age of 60. There was also concern that younger people might be 'noisy' and very energetic, which would change the atmosphere of the service.

These concerns can be addressed in the design of the service specifications, which current users of all three services would be involved in. The majority of service users from Sunberry that would be transferring to Imperial Wharf or Elgin would be aged 55+, but for those that are younger, the service would provide stimulating activities of their choosing. These activities may also appeal to the older people using the service and would be open for all to enjoy.

With regard to the concern about noise and energy levels, it is highly unlikely that the atmosphere within the building based services will change. Those with higher energy levels are more likely to chose the community access service and will therefore spend time away from the day centres.

Elgin Resource Centre

As with Imperial Wharf, the large majority (99%) of the current service users are aged 60+. The affect on the service of younger people with physical disabilities attending the service is therefore likely to be the same as with Imperial Wharf.

In addition to concerns about how well different age groups would mix, there was also concern during the consultation about how more people in wheelchairs would 'fit' into the building. The concern was that if more people with wheelchairs are in the building there would be less room for people that are able bodied. This was addressed by reassuring people that Elgin Resource Centre is a purpose built building that was designed for wheelchair accessibility. The service will therefore comfortably be able to accept more wheelchair users.

Elgin Resource Centre currently operates a popular 'drop-in' service for people aged 55+ that are non-FACS eligible but like to attend the service for lunch and activities such as art classes. During the consultation concern was expressed about this element of the resource centre ending to make room for those FACS eligible people who need the service for day care. This would impact on the local older population that currently enjoy the 'drop-in' service. It is hoped that there will still be space for people to drop in for

	lunch and join activities, but the priority will be those with FACS eligible day care needs.
	A way of creating more space for activities would be to have some activities later or earlier in the day, because currently most activities start at 11am and end by 3pm. In the service design, activities enjoyed by people that drop in are likely to be on the timetable outside of the service's core hours. A drop-in breakfast or tea could be offered as an alternative to lunch, for those that are non-FACS eligible. This would maximise the use of the day service building and the kitchen.
	2. Procurement proposals for Nubian and Shanti
	Nubian has not provided for younger service users with physical disabilities before, whereas Shanti already provides for this group. As with Imperial Wharf and Elgin, service users of Nubian would need to be consulted on this change to their service.
Sexual Orientation	It is unlikely that the merge of day services or the procurement proposals would have a differential impact on service users of different sexual orientations. However it should be considered that some evidence suggests as people get older they sometimes feel they should conceal their sexuality, for fear of discrimination. Service providers therefore should understand this and ensure that their service does not discriminate on grounds of sexuality.
Religion/ belief	Merge of day services for older and disabled people and cease use of 147 Stevenage Road as a day centre
(including non-belief)	LOW IMPACT
	There is no evidence to suggest that the merge in day service would have a differential impact on service users who have different religious or philosophical beliefs. The merged services would continue to provide for religious needs, for example by addressing dietary requirements such as using halal meat and celebrating all religious and cultural special days.
	2. Procurement proposals for Nubian and Shanti
	LOW IMPACT

Providers would be expected to demonstrate how they will ensure religious needs are considered in day services. This includes the provision of space for prayer, the provision for service users to remove their shoes and understanding of needs during religious festivals such as Ramadan.

Section 06	Reducing any adverse impacts
Outcome of Assessment	Merge of day services for older and disabled people and cease use of 147 Stevenage Road as a day centre
	The proposal to merge the day services for older and disabled people will on the whole have a neutral or positive impact on each of the protected groups. The positive impacts will reach people with disabilities in particular because the new service would offer greater choice and alternative opportunities for people to meet their day care needs. Those people with disabilities under the age of 55 will be particularly advantaged because services currently unavailable to them will be opened up for people of all ages.
	Negative impacts mostly concern current users of Sunberry ILS that are reliant in the familiarity and sense of security they get from going to a service they have been attending for many years. During the transition stage there would be a planned approach to ensuring that this change is managed well. Service users and their carers would each be met with and would have their own action plans so ensure they understand their options and feel comfortable with the new services.
2. Procurement proposals for Nubian and Shanti	
	No adverse impacts identified.

Section 07	Action Plan					
Action Plan	Issue identified	Action	When	Lead officer	Expected	
					outcome	
	Uncertainty and	Individual action	Start in February	Day services	Smooth transition	
	anxiety of moving	plans to be in	2011, on-going	manager –	to new services	

to a new service (section 04, p4, and section 05, p7)	place, including visits to new services	until June/July 2011	Nia Evans	for service users and carers
Possible new providers	Implementation plans, regular meetings and contract monitoring to be in place ahead of new services starting	To be part of the tender submission	Acting Head of Procurement - Kay Fisher	Smooth transition of new providers
Signage and access to Imperial Wharf (section 4, p5)	Negotiations with building owners and day services manager currently taking place to create better signage and improved access via electric gates	From December 2010	Day services manager – Nia Evans	Improved signage and access to Imperial Wharf, making it more visible and user- friendly
Need for services to suit all ages, including building based activities timetable (section 5, p11)	Current service users and carers to be involved with the service design and activities timetable to ensure needs are met	February 2011 – June/July 2011	Commissioning Manager – Hannah Carmichael	Services that people of all ages with disabilities will benefit from

Section 08	Agreement, publication and monitoring
Chief Officer sign-off	Name: John Chamberlain
	Position: Assistant Director of Adult Social Care
	Email: john@chamberlain@lbhf.gov.uk
	Telephone No: 020 8753 5004

Key Decision Report	Date of report to Cabinet/Cabinet Member: 07/02/2011 Confirmation that key equalities issues found here have been included: Yes
Opportunities Manager	Name: Carly Fry Position: Opportunities Manager Email: carly.fry@lbhf.gov.uk Telephone No: 020 8753 3430