

APPENDIX 4: Equality Assessment

Stage 1 Screening Data

1. What are the objectives and expected outcomes of your proposal? Why is it needed? Make sure you highlight any proposed changes.

The Housing Related Support Strategy (HRSS) outlines the commissioning intentions for 2017 – 2020. Consultation on the strategy took place during September 2015 and May 2016, consultation events took place with front line staff, service users and wider stakeholders. The aim of the strategy is to set out Brent's vision and establish the key priorities for development.

This equality assessment is to determine the impact of re-commissioning services in line with the corporate framework for procurement.

The HRSS sets out the commissioning arrangements for Housing Related Support (HRS) services set to be delivered from April 2017. The strategy seeks to review the current provision of accommodation based and floating support services available within the current Supporting People (SP) budget, and make appropriate savings.

The HRSS focuses on floating support services as the default model, with a small number of accommodation based services where service needs cannot be met via floating support services. Services will be delivered to a number of people seen as vulnerable but who do not meet statutory thresholds.

Although HRS is not a statutory service, the support provided can prevent the need for statutory services, and if this service was withdrawn there would be a direct impact on statutory services. HRS offers support to a number of client groups enabling vulnerable people to live independently and in addition to improving their health and wellbeing.

Objectives

It is recognised that HRS is a preventative service which contributes to the health and wellbeing of Brent residents. An effective prevention service can reduce demand for, and the costs of, housing and homelessness, health and care services.

The HRSS proposes a way forward based on provisioning with floating support (FS) services and accommodation based services (ABS): ABS will be funded only where service needs can only be met effectively in this way, (e.g.: direct access, refuges, high support mental health provision).

HRS services aim to develop or sustain an individual's capacity to live independently and sustain their tenancies. The service does not provide general health services, social care or statutory personal care services, but rather services with the aim of supporting independent living. The service applies to everyone as long as they meet the criteria for HRS, HRS promotes equality of opportunities further and for equal and fair access for the services irrespective of an individual's protected characteristics (Race, gender, disability, age, sexual orientation, religion or belief, marriage and civil partnership, pregnancy and maternity, gender reassignment), everyone has universal access to HRS irrespective of the above,

The overarching objective is to advance the prevention agenda in order to promote wellbeing and reduce the numbers and extent of needs of people requiring statutory services.

Outcomes and Proposed Changes

The overall outcome is for HRS services to form part of a 'Whole System' approach and that services are not commissioned in isolation. To ensure that the services commissioned are designed to increase a service user's choice and control and ensure service users are involved in decisions about their services.

The over-riding successful outcome sought from HRS is that it resolves the reason why someone needed the service and then they no longer require it.

Specifically the service proposes:

- Introducing outcome focused specifications for all services, co-designed with service users.
- Prevention of homelessness
- Prevention of need for statutory Adult Social Care services
- Gaining employment for adults under 65

The Overall benefit of housing related support for clients, providers and commissioners:

- Clients - a more effective, outcome focussed service that meets demand and is flexible to meet a range of support needs.
- Providers - a more updated model that enables wider support and streamlined contract monitoring processes.
- Commissioners - A cost effective model that meets strategic need and contributes to a wider prevention agenda.

The level of support service users will receive will be tailored to their specific needs. For people with disabilities or high level needs that require intensive support on a frequent basis, accommodation based support services may continue to be a more appropriate option.

Why is it needed?

Most of the Council's current spend is focused on services for socially excluded people to whom Council does not owe statutory care or homelessness duties, nor, in most cases, would it owe a statutory duty if the services did not exist.

2. Who is affected by the proposal? Consider residents, staff and external stakeholders.

Provider/staff

The existing Provider is affected as the tender is open for other providers to bid.

Users

There are 652 (August 2015) clients currently in accommodation based services. Clients who are identified as potentially being suitable for floating support will be identified through individual assessment of their housing related support needs. As a result, the likelihood is

that the vast majority of floating support units will be filled from those living in accommodation based services. As such, this EIA only considers equalities data relating to accommodation based support services. Equalities data collected relates to the **435** Start Plus cases referred to accommodation based services April 2014-March 2015.

The table below shows the nine main client categories and current numbers of HRS clients living in accommodation based services (ABS) and receiving floating support services:

CLIENT GROUP	Total clients in ABS	Current FS clients
Young people	56	0
Mental health	202	137
Learning disability/ Physical disability/ sensory impairment	68	185
Single homeless (inc multi-needs, SH D&A SH Offenders)	243	429
Offenders/substance misuse	45	114
HIV	0	15
DV/ TP	38	109
Homeless families	0	70
older people	0	470
TOTAL CLIENTS	652	1529

The strategy proposes that where possible clients with low level support needs living in accommodation based services will exit the service and be supported into independent accommodation and depending on levels of HRS need will be able to access floating support provision.

3.1 Could the proposal impact on people in different ways because of their equality characteristics?

The Housing Related Support Commissioning Strategy should have no differential impact on any specific equality strand.

The services within the scope of the strategy are there to support all residents of Brent.

3.2 Could the proposal have a disproportionate impact on some equality groups? If you answered 'Yes' please indicate which equality characteristic(s) are impacted

The service will have an impact on age, as 2.76% of referrals to ABS made between the periods April 2014 - March 2015 were for people aged of 55+. HRS provision for older people has already been uncoupled from accommodation and all provision is currently delivered via floating support. The re-commissioning of a specialist floating support service for people over 65 focussing on targeted prevention of care, will be integrated with the ASC preventative offer.

Other floating support specifications will be designed with a particular client groups in mind and are thus tailored to the needs of those clients. Whereby, the aim is to meet the needs of each service user regardless of their age.

3.3 Would the proposal change or remove services used by vulnerable groups of people?

The levels and type of service provision will remain as at present, but will be improved by giving service users more choice and independence to decide how and where they receive HRS.

3.4 Does the proposal relate to an area with known inequalities?

Yes – adults social care clients

3.5 Is the proposal likely to be sensitive or important for some people because of their equality characteristics?

Age (16-24)

Disability (Residents of accommodation-based services will require accommodation with adaptations where necessary).

Race – A review carried out in May 2016 identified 19% of Brent residents have been identified as having a 'black' ethnicity (Source: Office for National Statistics © Crown Copyright 2012) compared to 72% of those in HRS accommodation based services. HRS services will be required to deliver services in an imaginative and flexible manner to improve accessibility for the range of service users.

3.6 Does the proposal relate to one of Brent's equality objectives?

Yes – Objective Four – Responsive services

Recommend this EA for Full Analysis?

Yes

4. Use the comments box below to give brief details of what further information you will need to complete a Full Equality Analysis. What information will give you a full picture of how well the proposal will work for different groups of people? How will you gather this information? Consider engagement initiatives, research and equality monitoring data.

Stage 2: Analysis

5. What effects could your policy have on different equality groups and on cohesion and good relations?

5.1 Age (select all that apply)

- ☒ Positive
- ☐ Neutral
- ☐ Negative

Please give details:

In general the ability to live in independent accommodation with better access to community activities through FS provision rather than an ABS setting with hopefully appeal to a broader representation of age groups.

Mitigate possible adverse impact for 16-24yr olds currently in ABS.

5.2 Disability (select all that apply)

- ☒ Positive
- ☐ Neutral
- ☐ Negative

Please give details:

The ability to live in independent accommodation with better access to community activities through FS provision rather than an ABS setting with hopefully appeal to a broader representation of disability.

Mitigate possible adverse impact for the disabled clients currently in ABS. For those with a disability, the transition from an accommodation based setting to a FS model will require practical support to help them access appropriate levels of floating support. The service has also identified that this client group may require more long term support which falls outside of current HRS service delivery therefore future services to this group will no time frame. It is also important that this group is provided with support to engage with other services outside within the wider community in order to maintain independence.

5.3 Gender Identity (select all that apply)

- ☐ Positive
- ☒ Neutral
- ☐ Negative

Please give details:

Gender Identity is not a distinguishing factor and there should be no greater impact on this group than on any other.

5.4 Marriage and civil partnership (select all that apply)

- ☐ Positive
- ☒ Neutral
- ☐ Negative

Please give details:

Marriage and Civil partnership are not distinguishing factors and there should be no greater impact on this group than on any other.

5.5 Pregnancy and maternity (select all that apply)

- ☐ Positive
- ☒ Neutral
- ☐ Negative

Please give details:

Pregnancy and maternity are not distinguishing factors and there should be no greater impact on this group than on any other.

5.5 Race (select all that apply)

- ☒ Positive
- ☐ Neutral
- ☐ Negative

Please give details:

A review of services identified there is a need for HRS providers to deliver targeted work to those identified as 'black', HRS to deliver flexible services which meet the needs of the client and have a deeper understanding of the communities they serve. Future services will be required to carry out target work with this client group in order to achieve positive outcomes.

5.7 Religion or belief (select all that apply)

- ☒ Positive
- ☐ Neutral
- ☐ Negative

Please give details:

A core aim of the HRS strategy is to provide alternatives to ABS, and to meet people's needs through FS provision wherever possible. However, should someone need to move into an accommodation based service, the aim is that all religious groups will feel equally able to do so. There is also potential for FS services to provide support to access places of worship.

5.8 Sex (select all that apply)

- ☒ Positive
- ☐ Neutral
- ☐ Negative

Please give details:

It is noted that a large proportion of women referred to ABS fall within the 16-24years age bracket, and linked to this within the HRS strategy it is anticipated that some ABS services will be retained based on strategic need via the Commissioning Matrix including the provision of a refuge and a direct access homeless service which will continue to have a positive impact on gender (women and families) as a protected characteristic.

5.9 Sexual orientation (select all that apply)

- ☒ Positive
- ☐ Neutral
- ☐ Negative

Please give details:

At present information on this protected characteristic is not collected, so it is not possible to draw any conclusions as to potential impact on this protected group.

5.10 Other (New Clients) (select all that apply)

- ☐ Positive
- ☒ Neutral
- ☐ Negative

Please give details:

Change in client demographics within the borough will need to also ensure services are adaptable in order to meet the needs of the community, services are also aware that changes to government legislation will also prompt adaptations to service delivery. The reduction in affordable homes in the borough will reduce the number of people who will be able to remain and maintain a tenancy. Provisions will need to be made to address how people will be supported if they re-locate out of borough.

6. Could any of the impacts you have identified be unlawful under the Equality Act 2010? Prohibited acts include direct and indirect discrimination, harassment, victimisation and failure to make a reasonable adjustment.

- ☐ Yes
- ☒ No

7. Please provide a brief summary of any research or engagement initiatives that have been carried out to formulate your proposal.

A design group of users and carers has been set up and will take part in the procurement process, the group met on a regular basis during the months of September 2015, October 2015, December 2015, January 2016, February 2016, March 2016, April 2016 to provide Council staff with input into potential new services.

Engagement with landlords and Providers, in group and individual settings.

Consultation events and focus groups held with service users.

A review of services was undertaken in August 2015 looking at the provision of ABS and FS, with the view of developing a 'Roadmap' for commissioning arrangements.

A HRS strategic review was undertaken in May 2016 looking at the client needs in ABS and any possible unmet needs. Findings of review informed the redesign of current services to address gaps in service provision and any unmet needs.

What did you find out from consultation or data analysis?

A positive impact in relation to service users across all protected groups, as the opportunity to live independently with the right support is a preferable long term outcome than living in less flexible/ accessible accommodation based support settings.

Housing Related Support formed part of a wider Council consultation (Outcome Based Review) which provided a more comprehensive insight into the borough housing needs. The overview of findings focused on adapting current assessment pathways in order to address the needs of vulnerable people, thus ensuring the right services are delivered to the right people.

Were the participants in any engagement initiatives representative of the people who will be affected by your proposal?

The participants were current service users

How did your findings and the wider evidence base inform the proposal?

STAGE 3: ACTION PLANNING

Now, you will respond to your findings from the analysis stage and complete an action plan. At this stage you need to think about how to remove or reduce all the negative impacts that you have identified and how to maximise any opportunities to promote equality. This might mean making changes to your proposal or to the way that it is implemented.

Action	By when	Lead Officer	Desired Outcome	Date Completed	Actual Outcome
Age- mitigate possible adverse impact	Via the tendering process	Susan Joseph	Ensure that the implementation of the strategy		

for 16-24yr olds currently in ABS	timeline		and case co-ordination meets the needs of 16-24yr olds currently in ABS		
Disability- mitigate possible adverse impact for the disabled clients currently in ABS	Via the tendering process timeline	Susan Joseph	Ensure that the implementation of the strategy and case co-ordination meets the needs of the 14 disabled clients currently in ABS		
Short briefing note covering equalities issues on each new service/contract	Via the tendering process timeline	Susan Joseph	Ensure that the implementation of the strategy meets the needs of our client groups		
Short briefing note on each stage of strategy implementation as per timeline	Via the tendering process timeline	Susan Joseph	Ensure that the implementation of the strategy meets the needs of our client groups		

8. What actions will you take to enhance the potential positive impacts that you have identified?

Ensuring that all users, regardless of their protected characteristics can access the redesigned services and the service meets the needs of as many of the community groups as possible.

9. What actions will you take to remove or reduce the potential negative impacts that you have identified?

Overall, this analysis has found that the proposed service will be beneficial for all clients. The analysis has identified a possible negative impact in relation to disability where an existing ABS service user has needs that cannot be met via FS service or if moving to independent living where there may be a case for an individual package of resettlement support to address needs around disability.

The analysis has also identified a possible negative impact on age in relation to the number of young people (16-24) in ABS and the requirement of an individual package of support to address needs around age. The review has identified the need for deeper understanding of those identified under 'Race' to ensure services are understanding of possible cultural needs which may have an impact in how a service user accesses or engages with services.

The service will be to promote resettlement into independent living from ABS, it is recognised that for many service users across all different groups, relocation may cause emotional distress and orientation issues in their new surroundings. To mitigate this, it will be necessary to manage case co-ordination sensitively and offer a 'resettlement package' to ensure that appropriate support and assistance are in place, both during and after the move.

10. Please explain how any remaining negative impacts can be justified?

While it is hoped that the flexibility of effective FS and individual support planning mitigates this risk, the benefits of the strategy, and the financial pressure on adult social care budgets mean that we must pursue the most suitable and viable services and may not be able to take into account the current relative needs of a small number of ABS service users.