

Name of the activity being assessed	Extra Care Housing recommendations related to the re-modelling of future provision, including the decommissioning of some lower-level provision, and the re-procurement of Extra Care across Blackburn with Darwen.				
Directorate / Department	Adults and Prevention	Service	Commissioning and Finance	Assessment Author	Victoria Walker
Is this a new or existing activity?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Existing	Responsible manager / director for the assessment		Elizabeth Fleming	
Date EIA started	13/06/2024	Implementation date of the activity		22/07/2024	

SECTION 1 - ABOUT YOUR ACTIVITY

How was the need for this activity identified? i.e. Why are we doing this activity?	As part of the wider review of Extra Care Housing (ECH) schemes in BwD, three schemes have been identified as low demand (Lees, Pembroke and Hindle Court) and we are proposing to remodel Pembroke and decommission Lees and Hindle as extra care housing (return to sheltered housing), The existing Cotton Spinners is expected to move from ECH to a different client group as Supported Living accommodation.				
What is the activity looking to achieve? What are the aims and objectives?	To ensure that the recommissioning of Extra care housing in BwD in 2024/25 provides the right 24hr housing and care services within the borough, meeting need and ensuring these needs are met in an efficient and effective manner. Aims and Objectives: <ul style="list-style-type: none"> • To ensure the Council is commissioning services which provide value for money whilst ensuring that schemes are viable, sustainable and that provide good quality services. • To match supply with demand for extra care Extra Care in BwD as a whole, and ensure provision is adequate in each geographic locality ie. Blackburn and Darwen • Where there is oversupply, to utilise resources/facilities to meet different client groups 				
Services currently provided (if applicable)	Blackburn (174 units): Spring Bank Court – 40 units; Kingsway – 60 units, Albion Mill (<u>not</u> affected by remodelling) – 74 units Darwen (190 units): Riverside Heights – 85 units (<u>not</u> affected by remodelling); Lees Court - 39 units, Hindle Court - 29 units, Pembroke Court – 28 units, Cotton Spinners – 9 units (affected schemes)				
Type of activity	<input checked="" type="checkbox"/> Budget changes <input type="checkbox"/> Change to existing activity	<input checked="" type="checkbox"/> Decommissioning <input checked="" type="checkbox"/> Commissioning	<input type="checkbox"/> New activity <input type="checkbox"/> Other [please state here]		

SECTION 2 - UNDERSTANDING YOUR CUSTOMER**What resources will support in undertaking the equality analysis and impact assessment?**

Please identify additional sources of information you have used to complete the EIA, e.g. reports; journals; legislation etc.

- Housing LIN model to determine demand for Extra Care Housing
- 4 weekly data returns and Mosaic data to determine commissioned care over 2 year plus period
- Meetings with stakeholders/partners
- SWOT analysis for each scheme
- Desk top review of needs of current people in receipt of a Package of Care

Who are you consulting with? How are you consulting with them? (Please insert any information around surveys and consultations undertaken)

- Survey of need within each individual schemes
- Meeting with tenants in each scheme
- Meetings with Anchor as the registered housing provider / landlord
- Meetings with the current care provider

The intention is to consult again once decision agreed, and those with social care needs will be reviewed, to ensure their needs will be appropriately met by existing or new care options.

Who does the activity impact upon?*	Service users	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Indirectly	A total of 97 tenants will be affected by change, of which 16 are in receipt of care. The majority of these have low-medium care needs that will be met by domiciliary care. Only one person will be asked to look at options to move home as the right care may not be able to be delivered in this setting/with proposed provision.		
	Members of staff	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Indirectly	Night staff at 2 schemes will be primarily affected		
	General public	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> Indirectly	Changes will affect levels of background care available at Lees and Pembroke which may cause concern for families/carers. 1:1 care is not affected		
	Carers or families	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> Indirectly	Housing provider (Anchor and Regenda) and current care provider (Icare)		
Does the activity impact positively or negatively on any of the protected characteristics as stated within the Equality Act (2010)?*	Positive impact	<input checked="" type="checkbox"/> Age	<input checked="" type="checkbox"/> Disability	<input type="checkbox"/> Gender reassignment	<input type="checkbox"/> Marriage & Civil Partnership	<input type="checkbox"/> Pregnancy & maternity	<input checked="" type="checkbox"/> Vulnerable groups
		<input type="checkbox"/> Race	<input type="checkbox"/> Religion or belief	<input type="checkbox"/> Sex	<input type="checkbox"/> Sexual orientation	<input type="checkbox"/> Deprived communities	<input type="checkbox"/> Carers
	Negative impact	<input checked="" type="checkbox"/> Age	<input type="checkbox"/> Disability	<input type="checkbox"/> Gender reassignment	<input type="checkbox"/> Marriage & Civil Partnership	<input type="checkbox"/> Pregnancy & maternity	<input type="checkbox"/> Vulnerable groups

The groups in blue are not protected characteristics <i>(please refer to p. 3 of the guidance notes)</i>		<input type="checkbox"/> Race	<input type="checkbox"/> Religion or belief	<input type="checkbox"/> Sex	<input type="checkbox"/> Sexual orientation	<input type="checkbox"/> Deprived communities	<input checked="" type="checkbox"/> Carers
	No impact	<input type="checkbox"/> Age	<input type="checkbox"/> Disability	<input checked="" type="checkbox"/> Gender reassignment	<input checked="" type="checkbox"/> Marriage & Civil Partnership	<input checked="" type="checkbox"/> Pregnancy & maternity	<input type="checkbox"/> Vulnerable groups
		<input type="checkbox"/> Race	<input type="checkbox"/> Religion or belief	<input type="checkbox"/> Sex	<input checked="" type="checkbox"/> Sexual orientation	<input checked="" type="checkbox"/> Deprived communities	<input type="checkbox"/> Carers

***If no impact is identified on any of the protected characteristics a full EIA may not be required. Please contact your departmental Corporate Equality & Diversity representative for further information.**

Does the activity contribute towards meeting the Equality Act's general Public Sector Equality Duty? *Refer to p.3 of the guidance for more information*
A public authority must have 'due regard' (i.e. consciously consider) to the following:

DUTY	DOES THE ACTIVITY MEET THIS DUTY? EXPLAIN
Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act <i>(i.e. the activity removes or minimises disadvantages suffered by people due to their protected characteristic)</i>	The proposals do not discriminate based on protected characteristics and potentially widen the number of people who can have access to the properties.
Advance equality of opportunity between those who share a protected characteristic and those who do not <i>(i.e. the activity takes steps to meet the needs of people from protected groups where these are different from the needs of other people)</i>	<p>The proposals potentially widen the number of people who can have access to the properties by removing the barrier to 'require care' to be eligible for Extra Care accommodation (Hindle Court and Lees Court). Age eligibility will remain in place.</p> <p>The overarching proposals for extra care also include developing a scheme for people with mental health conditions (Cotton Spinners), which has been identified as a gap in provision within the borough.</p>
Foster good relations between people who share a protected characteristic and those who do not <i>(i.e. the function encourages people from protected groups to participate in public life or in other activities where their participation is disproportionately low)</i>	The proposals will not affect the encouraging of people to participate in public life, as this will remain part of the housing related support provided by the landlord.

ASSESSMENT	Is a full EIA required?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Please explain how you have reached your conclusion <i>(A lack of negative impacts must be justified with evidence and clear reasons, highlight how the activity negates or mitigates any possible negative impacts)</i>			
<p>There may be some negative impacts on a small number of people in the schemes. An initial desktop exercise by the social work team has identified 1 or 2 people in this category. It is possible that those with a clear 24/7 need may choose to move to another extra care scheme in order to continue to live independently with 24/7 care, and this will be facilitated (with any individual being given priority). If they choose not to move then other night services will be offered where eligible.</p> <p>However, other people may also benefit from the schemes no longer being classed as extra care as they no longer need to meet the care eligibility to benefit from the additional support offered.</p>			

Author Signature	V. Walker	Date	13/06/2024
Head of Service/Director Signature		Date	

The above signatures signify acceptance of the ownership of the Initial EIA and the responsibility to publish the completed Initial EIA as per the requirements of the Equality Act 2010.

Departmental E&D Lead Signature		Date	
--	--	-------------	--

FULL EQUALITY IMPACT ASSESSMENT

SECTION 3 – ANALYSIS OF IMPACT

Does the activity have the **potential** to:

- **positively** impact (benefit) any of the groups?
- **negatively** impact/exclude/discriminate against any group?
- **disproportionately** impact any of the groups?

Explain how this was identified – through evidence/consultation.

Any negative impacts that are identified within the analysis need to be captured within the action plan in **Section 4**

N.B. Marriage & Civil Partnership is only a protected characteristic in terms of work-related activities and NOT service provision

Characteristic	Positive	Negative	Don't know	Reasons for positive and/or negative impact Please include all the evidence you have considered as part of your analysis	Action No.
Age	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>Although the schemes identified for decommissioning as extra care (Hindle and Lees Court) is for older people over 55, the accommodation will remain and all tenants will be able to retain their tenancies should they wish to do so. Initial consultation with tenants at Hindle Court indicate they are not concerned about the provision of extra care as the provision has only ever been delivered to them on a domiciliary care basis (as a satellite scheme to Pembroke Court). Those at Hindle, Lees and Pembroke Court will be consulted with further to ensure they understand all the implications and their care needs can be effectively met.</p> <p>The proposed changes to schemes also provide the opportunity to a wider group of elderly people, to access sheltered accommodation as they would not have to meet the care eligibility criteria for Extra Care.</p>	
Disability	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>The need of those with lower levels of care will continue to be met on a domiciliary care basis. However, it is possible that those with higher levels of care may benefit from moving to a scheme with 24 hour care in place.</p> <p>The proposed changes to schemes also provide the opportunity to a wider group of elderly people with mobility issues, but no care needs, to access sheltered accommodation as they would not have to meet the care eligibility criteria for Extra Care.</p>	
Gender reassignment	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		

Marriage & Civil Partnership	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Pregnancy & Maternity	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Race	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Religion or Belief	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Sex	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Sexual orientation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Vulnerable Groups	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>A wider vulnerable groups (ie. those without an eligible care need) will be able to access the decommissioned scheme as the level of support is lower than previous provision.</p> <p>Alternative arrangements will be made for people who can no longer live within the scheme, due to any very high needs and behaviours. This will be done sensitively with individuals by social workers and with their full consent and the involvement of families.</p> <p>The proposal also makes addition resource available (Cotton Spinners) for those with higher level needs around mental health.</p>	
Deprived Communities	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Carers	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The proposals may impact negatively on informal carers with loved ones in the scheme, where core background care is reduced.	
Other [please state]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		

<p>Does the activity raise any issues for community cohesion?</p> <p>Does the activity contribute positively towards community cohesion?</p>	<p>There is a possibility that reducing on site staffing at schemes will impact on the management of any incident of anti social behaviour within the scheme(s). However this will be managed by the housing provider, and any individual who requires support in a different setting will be supported to make that move.</p>
<p>Does the activity raise any issues in relation to human rights as set out in the Human Rights Act 1998? Details of which can be found here</p>	<p>No</p>
<p>Does the activity support / aggravate existing</p>	<p><i>Is the activity on the departmental risk register? If it is not, should it be?</i></p>

<p>departmental and/or corporate risk?</p>	<p>Possibly, in terms of complaints/poor PR whilst the changes are being implemented</p>
--	--

CONCLUSIONS OF THE ANALYSIS

Action following completion of the impact assessment

It is important that the correct option is chosen depending on the findings of the analysis.

The action plan must be completed as required.

No major change in the activity

Adjust activity

Continue with activity

Stop and reconsider activity

Please explain how you have reached your conclusion

We have conducted consultation with stakeholders, and have reached logical evidenced based conclusions. The changes do not impact on where people choose to live, but may have an impact on the level of care and support they receive.

Individuals living in schemes will be reviewed as a result of the implementation of any agreed changes, and each individual and their family affected will be able to make informed decisions relating to whether they stay in their current property or move. Note: a move would only be required when an individual's needs could only be met in 24 hr care.

ACTION PLAN

Action No.	What is the negative / adverse impact identified?	Actions required to reduce / mitigate / eliminate the negative impact	Resources required	Responsible officer(s)	Target completion date
1	Impact on tenancy / decision to move	<p>Work with the housing provider to identify individuals and families who will be most affected by any change in service.</p> <p>Provide effective communications with all tenants and families so they understand their rights and the implications of change.</p>	Officers and senior managers to deliver communications alongside housing and care partners	Vicky Walker / Elizabeth Fleming	Dec 24
2	Those with very high care needs may need to move	<p>A desk top exercise has been undertaken to identify individuals and potential impact.</p> <p>Work will continue with housing, care, and support professionals to ensure we identify, assess and offer choice to those with the highest level of care needs.</p> <p>Transitional arrangements will be put in place to ensure that the change in service can be effected smoothly</p> <p>Reduce any impact on future tenants by removing scheme from new ECH allocations</p>	<p>Social work assessment resource</p> <p>Partners resources</p>	Vicky Walker/Brendan Gray/Lara Taylor	Dec 24
3	The scheme is no longer suitable for vulnerable people with high support, rather, than care needs	<p>The identified people will be assessed for their support needs and if alternative options would better meet needs then the person will be offered support to move.</p> <p>Transitional arrangements may also support the housing provider to step up levels of support</p>	Housing support plans to be reviewed and where required social work assessment to take place with individual options for support highlighted	Anchor Housing / Vicky Walker / Brendan Gray / Lara Taylor	Dec 24
4	Loss of background support in schemes which may impact on carers	Work will continue with housing, care, and support professionals to ensure we identify, assess and offer choice to those with the highest level of care needs. This will involve families and informal carers and any concerns can be addressed re care needs.	<p>Social work assessment resource</p> <p>Carer support information</p>	Brendan Gray/Lara Taylor	Dec 24



		If carers themselves require additional support they will be signposted to other agencies			

MONITORING AND REVIEW

The responsibility for establishing and maintaining the monitoring arrangements of the EIA action plan lies with the service completing the EIA. These arrangements should be built into the performance management framework.

Monitoring arrangements for the completion of EIAs will be undertaken by the Corporate Equality & Diversity Group and the oversight of the action plans will be undertaken by the Management Accountability Framework.

If applicable, where will the EIA Action Plan be monitored?	<i>e.g. via Service Management Team; Service Leadership Team; Programme Area Meetings</i> Housing and Care management team who will also report progress to SLT
How often will the EIA Action Plan be reviewed?	<i>e.g. quarterly as part of the MAF process</i> Every 2 weeks following decision
When will the EIA be reviewed?	<i>It should be reviewed at least every 3 years to meet legislative requirements</i> The impacts will be reviewed post change in service, for the transitional period, until a steady state has been reached
Who is responsible for carrying out this review?	Housing and Care team within the Commissioning and Finance function

Author Signature	V. Walker	Date	13/06/2024
Head of Service/Director Signature		Date	20/06/2024
<i>The above signatures signify acceptance of the ownership of the full EIA, the responsibility for the associated Action Plan (if applicable) and the responsibility to publish the completed full EIA as per the requirements of the Equality Act 2010.</i>			
Departmental E&D Lead Signature		Date	20/06/2024