

# Budget Savings Proposals

## Full Equality Impact Assessment (EQIA)

### Section 1: General Information

**1a) Name of the savings proposal**

LD Resettlement Project

**1b) Service area**

Disability Accommodation Resettlement

**1c) Service manager**

Cheryl Spencer

**1d) Name and role of the officer/s completing the EQIA**

Graham Young – Disabilities Commissioning Officer (Secondment)

## Section 2: Information about changes to services

### 2a) In brief please explain the savings proposals and the reasons for this change

The project will enable the council to take a consistent approach using housing options documentation to review all disability long term placements and supported living placements to ensure that individuals are living in the most appropriate accommodation suitable to meet their needs. It will identify if more suitable housing options are available which is anticipated to include significant savings by resettling people in step down alternative accommodation that is less than the cost of residential care. It is accepted that there are likely to be some individuals that will attract a higher care support cost as the current placement may not be fully meeting their needs. It is part of the drive of Transforming Adult Social Care (specifically “Putting People First” and “Valuing People Now”) to give individuals choice and to support individuals to live as independently as possible with effective use of resources.

The proposed change reduces resources spent on people with disabilities, but provides a better quality and better value for money alternative to residential care. The provision of residential care for people who are able to live more independently in supported housing is not best practise.

### 2b) What are the equality implications of your proposal?

All savings proposals have been screened for equalities relevance using the test of relevance questionnaire attached at Appendix A. Please go back to each of the test of relevance questions and **using evidence** please provide a more detailed analysis of the equality impact of your proposal.

The scope of the proposal is to review in total 271 Disability Residential and Supported Living Placements. By nature this means that group affected by the review are all people with disabilities. The breakdown of people affected is as follows:

159 Learning Disability Residential Placements in and out of borough  
54 Learning Disability Supported Living Placements in and out of borough  
56 Other disability (not MH) Residential Placements out of borough  
2 Other disability (not MH) Supported Living Placements out of borough.

To date 37 individuals have been identified for potential changes to their accommodation.

Four individuals have transferred from supported living accommodation from in and outside of the borough to extra care sheltered

housing but still living in the community with their own tenancy but will now live with others near their own age and with more appropriate care and support on site which has still enabled cost savings to be made. Two individuals have transferred from residential care in and out of borough to supported living accommodation in borough which enables them to live with their peers which has a mix of tenants in relation to their age, sex, disability, ethnicity and culture. One individual is moving from residential outside of the borough to the family home outside of the borough which is enabling them to live in the community and meeting ethnicity and cultural needs. One individual has moved from supported living in borough to residential in borough but this home is due to be deregistered to supported living before 31<sup>st</sup> March 2011 so his independence will be maintained in a suitable setting.

The people who are affected by the review may have different ways of communicating; this can include sign language, makaton, and the use of plain english. Therefore making sure people understand what is happening, and that their choices and wishes are respected requires different tools and techniques other than relying on speech and the written word. For this reason the resettlement reviewing team are using a housing options document that includes easy read pictures to identify accommodation wishes. The types of things covered by the review documentation includes: different housing options including sharing, other people they may wish to live with or near, the support they feel they require and how they would like that delivered and where they wish to live and what local facilities are important to them. Each person is reviewed as an individual with any resettlement recommendation taking into account individual needs and preference.

An Independent Mental Capacity Advocacy can be used where appropriate to ensure that an individual that does not have capacity to make decisions about housing arrangements understands and agrees with the implications of any recommended changes. Without the consent of the service user, no change will be made. It is very rare for this service user group to move out of supported accommodation all together and this proposal does not make any plans to move people on from supported housing.

As a result of the operational implementation of the project, we do not believe that there will be adverse equality implications for services users as a result of the project. There is likely to be an improvement in the outcomes and life experience of service users.

Where a person centred review identifies that current accommodation arrangements are not the most appropriate or suitable to meet a service users needs and a decision is made for the individual to move to new accommodation, there may be some short term transitional impact. During this time, staff will work intensively with service users and their families to ensure that the impact of the transition is mitigated.

The information provided through the review regarding care needs and ability should be supported by the current care provider evidenced in care planning documentation and identifying any behaviours and risks. Confirmation that an individual has been identified appropriately is through Care Programme Management in CLDS that the assessment is correct and the individual fully

understands the implications of what is being proposed and independent Independent Mental Capacity Advocate (IMCA) support is available to assist with this. There is an appeals process through the FAC's eligibility criteria for any decision to be reviewed and individuals need to be given and supported to access this.

Some individuals may be living in residential and supported living outside of the borough and it may be their wish to continue to live outside of TH. Individuals already in supported living will be offered suitable alternative accommodation choices in TH that they may wish to reject and Ordinary Residence will apply to transfer responsibility of care to the home authority through a process of referral, assessment and agreed handover by the Care Programme Management. Where an individual is in residential care and is suitable for supported living and wishes to remain in the area because of length of time and local links made will be supported to find suitable accommodation and then Ordinary Residence applied by Care Programme Management.

Some individuals may require increased cost support packages for short term re-ablement for training in daily living skills to encourage the ability and confidence to carry out tasks having been de-skilled in the current setting before resettlement. Individuals receiving support are vulnerable and decisions will be based on clinical assessments (usually multidisciplinary and including social care) and not any other consideration.

### Section 3: Equality Impact Assessment

With reference to the analysis above, for each of the equality strands in the table below please record and evidence your conclusions around equality impact in relation to the savings proposal.

<p><b>Race</b></p> <p><i>Identify the effect of the policy on different racial groups.</i></p>	<p>Will the change in your policy/service have an adverse impact on specific ethnic groups? no Please describe the analysis and interpretation of evidence to support your conclusion.</p> <p>The race of the group being reviewed is 202 W British / 31 Asian / 27 Black African / 4 Mixed Race / 7 Other</p> <p>The proposal will have a positive effect to enable people who have been placed out of borough to return to live in the borough to live nearer to family/friends and their community to allow cultural needs to be met. The housing options documentation allows people to choose if they wish to live/share with people from their own race or culture. All services will be personalised around the needs of each individual.</p> <p>One individual is living in a residential home in a part of London where he is not able to access places to meet his race and cultural needs but by living back in Tower Hamlets will be able to access easily with support family, local community groups and the local community for race, language, culture and food.</p>
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<p><b>Disability</b></p> <p><i>Identify the effect of the policy on different disability groups</i></p>	<p>Will the change in your policy/service have an adverse impact on disabled people? no Please describe the analysis and interpretation of evidence to support your conclusion.</p> <p>The disability of the group being reviewed is Learning Disability 213 / Physical Disability 34 / Vulnerable Adult 22 and Sensory Disability 2</p> <p>The housing options document allows people to choose if they wish to live with/share with others with a disability. It also asks if there training/support needs required by the individual to prepare them for any changes. The proposal should have a positive effect to promote the choice and independence of individuals to live as they wish having similar housing choices to the rest of society. All services will be personalised around the needs of each individual to have a wider range of options and help to identify the level of need of each individual and redesign service and care to meet those needs.</p>
<p><b>Gender</b></p> <p><i>Identify the effect of the policy on different gender groups (inc Trans) groups</i></p>	<p>Will the change in your policy/service have an adverse impact on men or women? no Please describe the analysis and interpretation of evidence to support your conclusion.</p> <p>The gender of the group being reviewed is Female 98 and Male 173</p> <p>The housing options documentation allows people to choose how they would like to live and includes if they wish to live in or share accommodation with anybody which includes gender choices.</p>

<p><b>Sexual Orientation</b></p> <p><i>Identify the effect of the policy on members of the LGB community</i></p>	<p>Will the change in your policy/service have an adverse impact on lesbian, gay or bisexual people? no Please describe the analysis and interpretation of evidence to support your conclusion.</p> <p>There is no sexual orientation information regarding the group being reviewed but all care support plans are person centred to meet individual need.</p> <p>One pair of friends were rough sleepers, they were moved in to LD supported living accommodation but because of age and deterioration of health they require more support have been transferred to extra care sheltered housing sharing a flat as one person sleeps in a chair as is his custom and preference which has been supported and met.</p>
<p><b>Religion and Belief</b></p> <p><i>Identify the effect of the policy on different religious and faith groups</i></p>	<p>Will the change in your policy/service have an adverse impact on people who practice a religion or belief? no Please describe the analysis and interpretation of evidence to support your conclusion.</p> <p>There is little information regarding religion or belief of the group being reviewed as it is optional whether a person informs their social worker of their religious views. The question is asked during the care management process.</p> <p>The proposal will have a positive effect to enable some people who have been placed out of borough to return to live in the borough to live nearer to family/friends and their community to allow easier access to services so that religious and belief needs can be met.</p> <p>One individual is living in a residential home in a part of London where he is not able to access a place to meet his religious needs but by living back in Tower Hamlets will be able to access with support religious centres to meet his individual needs. Also one individual residing in Sussex to return to living in London where she will be able to see and mix with people from a similar cultural background.</p>

<p><b>Age</b></p> <p><i>Identify the effect of the policy on different age groups using the prompts above</i></p>	<p>Will the change in your policy/service have an adverse impact on specific age groups? no Please describe the analysis and interpretation of evidence to support your conclusion.</p> <p>There is a very broad age range from 20 to 89 across all the equality strands and when considering appropriate accommodation the individual has choice if wishes to live with others in a similar age group.</p> <p>This proposal will create positive opportunities for other people who may be living in the community with family and those coming through transitions to adulthood that this housing options will give people genuine housing choices not previously given to people with a disability. With people with a learning disability living longer due to healthier lifestyles and medical advancements this aging client group are at greater risk of developing dementia than the general population and the need to ensure there is development of services to meet this growing need.</p>
<p><b>Socio-economic</b></p> <p><i>Identify the effect of the policy in relation to socio-economic inequalities</i></p>	<p>Will the change in your policy/service have an adverse impact on people with low incomes? no Please describe the analysis and interpretation of evidence to support your conclusion.</p> <p>This proposal will benefit people moving in to supported housing as they will be helped to claim all housing and disability benefits they are entitled to and there is no contribution to the cost of their care support when living in the community as there is for residential care.</p> <p>People living in supported living will have access to a personal budget to have choice and control to self direct their support service to meet their care and support needs.</p> <p>Part of the review process will be to confirm that all residential placements are attracting all appropriate client and health contributions but this is required under national regulations and should already have been assessed for such.</p>

<p><b>Other</b></p> <p><i>Identify if there are groups, other than those already considered, that may be adversely affected by the policy?</i></p>	<p>Will the change in your policy/service have an adverse impact on any other people (e.g. carers)? yes/no Please describe the analysis and interpretation of evidence to support your conclusion.</p> <p>Family and carers will be involved in the review process and any views and concerns considered but consistent use of FAC's eligibility criteria and duty of care to the individual to decide the appropriate housing and support needs. Consultation with family carers, show them housing and support choices to allay any concerns they may have. The use of IMCA services to ensure understanding by the individual to make informed choices about what they want. Ensure the appeals process is known for any decision to be reviewed and confirmed if correct.</p>
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<p><b>Staff</b></p> <p><i>Identify if there are any staff groups, , that may be adversely affected by the policy?</i></p>	<p>Will the change in your policy/service have an adverse impact on staff? N/A Please describe the analysis and interpretation of evidence to support your conclusion.</p>
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#### Section 4: Equality Impact Assessment Action Plan

Please list in the table below any adverse impact identified and, where appropriate, steps that could be taken to mitigate this impact.

If you consider it likely that your proposal will have an adverse impact on a particular group (s) and you cannot identify steps which would mitigate or reduce this impact, you will need to demonstrate that you have considered at least one alternative way of delivering the change which has less of an adverse impact.

Adverse impact	Please describe the actions that will be taken to mitigate this impact
<b>Potential impact on carers.</b>	<ul style="list-style-type: none"> <li>▪ Family and carers will be involved in the review process and any views and concerns</li> <li>▪ use of IMCA services to ensure understanding by the individual to make informed choices about what they want.</li> <li>▪ Appeals process</li> </ul>
<b>Communication barriers</b>	<ul style="list-style-type: none"> <li>▪ Use of easy read documentation</li> <li>▪ Person centred approach</li> <li>▪ Interpreters and translators will be involved when required.</li> </ul>

If an adverse impact cannot be mitigated please describe an alternative option, its costs and the equality impact.

## Section 5: Future Review and Monitoring

Please explain how and when the actual equality impact of these changes will be reviewed and monitored.

The Disabilities Accommodation Review and Resettlement working group meet every 2-3 weeks to track all the movements and discuss ongoing cases and issues with decisions and options to progress the project. The project leaders from the working group meet and report to the Workstream Savings Project Board every 6 weeks to track the savings and identify any risks to meeting the project activities and financial savings targets. Monitoring of outcomes by equality strands will be maintained by the Disabilities Accommodation Review and Resettlement Team working group which informs the Disabilities Accommodation Group and is a sub group of the Learning Disability Partnership Board. The Learning Disability Partnership Board will monitor the outcomes of the care decisions annually using the six equality strands. It could also report to the Directorate Equalities Focus Group. Accommodation and care and support will continue to be reviewed by CLDS under FAC's legislation. Monitoring will also occur through the monthly Highlight Report meeting with the AHWB Efficiency Programme Manager.

Care support providers will report to the Community Learning Disability Team if there are any concerns in the support to be given or if the individual is having any problems in the new accommodation. Any placement or community support package will ensure that the vulnerable is protected from risk of harm and will be reviewed annually under FAC's requirements.

The Disabilities Funding Panel is now managed by AHWB to ensure that inappropriate placements by risk adverse social work practitioners are now challenged and funding will only be approved if the accommodation is suitable to meet individual need.

A greater number than the original 271 being reviewed will have improved housing options choices as this will be available to all people with a disability to have access in the future to appropriate accommodation and care support options. There will be options to have greater access general needs housing with LBTH, social landlords and private rented and review medical and assessment policies to give priorities for conditions or disabilities to have housing quotas as part of a lettings plan.

Individuals accessing community services that are commissioned are monitored through contract arrangements and provider reporting and personal budget services will also be monitored by commissioning staff for quality and value for money.

The Care Quality Commission has legal responsibility for registration, inspection and quality ratings of residential and domiciliary care, it is unknown currently if they will have any responsibility for supported living though some providers register supported living accommodation for domiciliary care to ensure a service is registered. Inspection of premises is on a programme basis with the quality rating assessed and the report is put on their website that funders can check. Twice yearly a CRAGG report is sent to all local authorities to inform them if they have anyone placed in a service that is only rated as adequate and poor and the local

authority will carry out an emergency review to ensure the safety of the individual placed there.

## APPENDIX A: Equality Impact Assessment Test of Relevance

TRIGGER QUESTIONS	YES / NO	IF YES PLEASE BRIEFLY EXPLAIN.....
<p><b>Does the change reduce resources available to address inequality?</b></p>	<p><b>Yes</b></p>	<ul style="list-style-type: none"> <li>• What outcome did the previous intervention seek to achieve?</li> <li>• What evidence do you have about how effective the previous intervention was?</li>   <li>• The change aims to provide a better quality and better value for money alternative to residential care for people with mental health problems and learning disabilities. It also reduces the cost of services.</li> <li>• The numbers of people supported is not reduced</li> <li>• The provision of residential care for people who are able to live more independently in supported housing is not best practice. In many cases due to the shortage of residential care people are currently living in residential homes outside the Borough, away from networks of family and friends.</li> </ul>
<b>CHANGES TO A SERVICE</b>		
<p><b>Does the change alter access to the service?</b></p>	<p><b>Yes</b></p>	<ul style="list-style-type: none"> <li>• Is there evidence that access will be more difficult or costly for some people?</li>   <li>• There is no evidence that access will be more difficult or costly. Any service user who is moving from residential care into supported housing, does so on the basis of an assessment of need and is fully supported by care management staff through that transition.</li> <li>• The Resettlement Team identify individuals and potential alternative accommodation options, but they do not make the final decision. Reviews focus on the needs of the individual receiving support. All reviews are conducted within the Care Programme Approach and input is across the multi disciplinary Community Learning Disability Team. In situations where alternative forms of support are introduced these are only commissioned if they meet quality standards.</li> </ul>

<p><b>Does the change involve revenue raising?</b></p>	<p><b>No</b></p>	<ul style="list-style-type: none"> <li>• What evidence do we have about who will pay?</li> <li>• What impact will this have on the income available for these people?</li>   <li>• This is not a revenue raising proposal</li> <li>• Under national regulations people living in residential care are already financially assessed to make a contribution to their care costs</li> <li>• People living in supported housing make no contribution to the costs of their care support</li> <li>• People moving into supported housing would be helped to claim all housing and disability benefits that they are entitled to.</li> <li>• People moving to supported housing in the borough will have access to individual budgets to directly control and manage their support needs.</li> </ul>
<p><b>Does the change alter who is eligible for the service?</b></p>	<p><b>No</b></p>	<ul style="list-style-type: none"> <li>• What evidence do we have about who will no longer be eligible for the service?</li> <li>• Is this likely to lead to poorer outcomes for those who cannot access the service?</li>   <li>• There is no change in the Council's FACS eligibility criteria.</li> </ul>
<p><b>Does the change involve a reduction or removal of income transfers to service users?</b></p>	<p><b>No</b></p>	<ul style="list-style-type: none"> <li>• What evidence do we have on who has benefits from these transfers?</li> <li>• What is the likely impact of the removal of the income to current beneficiaries?</li>   <li>• Some individuals may not currently be contributing to their care costs but under national regulations people living in residential care are should all have been financially assessed to make a contribution to their care costs.</li> </ul>
<p><b>Does the change involve a contracting out of a service currently provided in house?</b></p>	<p><b>No</b></p>	<ul style="list-style-type: none"> <li>• Is there a need to include promotion of equality in the new contract arrangements?</li> <li>• These services are all provided by external providers</li> </ul> <p>There is a commissioning relationship with all providers in borough for residential and supported living. There are contracts in place with service specifications for all in borough services and residential providers outside of the borough with a reporting requirement of any incidents, change of circumstances or hospital admittance.</p>

<b>CHANGES TO STAFFING    N/A</b>		
<b>Does the change involve a reduction in staff?</b>	<b>N/A</b>	<ul style="list-style-type: none"> <li>• What evidence do we have about the composition of the current workforce?</li> <li>• Are there some groups who are likely to be disproportionately affected by the proposed reduction?</li> </ul>
<b>Does the change involve a redesign of the roles of staff?</b>	<b>N/A</b>	<ul style="list-style-type: none"> <li>• What evidence is there that this could have an impact on equal pay?</li> <li>• Does the change reduce the ability of staff to work flexibly?</li> </ul>