

**Appendix 4 Equality Impact Assessment and Action Plan
KENT COUNTY COUNCIL**

EQUALITY IMPACT ASSESSMENT (REVIEW)

This form dated 17/12/2010 supersedes all previous EIA/ CIA forms

Directorate:

Communities

Name of policy, procedure, project or service

Delivering the Savings Proposals – Report (Review)

Type

The strategic level document sets out the way the Kent Supporting People Programme intends to achieve the savings asked for by the reduction in grant Allocation as well as implementing the priorities set in the Supporting People Strategy 2010-15.

Responsible Owner/ Senior Officer

Claire Martin, Head of Supporting People

Date of Initial Screening

14 February 2011

Date of Review

2 March 2011

Screening Grid

Characteristic	Could this policy, procedure, project or service affect this group differently from others in Kent? YES/NO	Could this policy, procedure, project or service promote equal opportunities for this group? YES/NO	Assessment of potential impact HIGH/MEDIUM/LOW/ NONE/UNKNOWN		Provide details: a) Is internal action required? If yes, why? b) Is further assessment required? If yes, why? c) Explain how good practice can promote equal opportunities
			Positive	Negative	
Age	<p>No – Current levels of accommodation based services, HIAs and handyperson services and community alarms are to be retained but at reduced cost.</p> <p>No – The QAF requires providers to meet equality & diversity in services, including fair access</p> <p>Yes – Bringing cost in extra care sheltered accommodation in line with cost in sheltered accommodation and reducing expenditure on community alarms might lead to access being dependent on individual ability to contribute more towards cost or to such services becoming unviable because other stakeholders being unable to fill the funding gap</p> <p>Yes – Reducing the level of floating support services and potentially restricting access could lead to less support being available to vulnerable people</p>	<p>Yes – by identifying specific support needs and ensuring services meet them as well as identifying gaps in services</p> <p>Yes - Commissioning of more services for young people at risk will prevent homelessness and enable more of them to stay in their areas of origin and near to their existing social networks.</p> <p>Yes – Retaining current levels of accommodation based services will continue to enable vulnerable people to have choice and live independently in the community.</p>	High	As yet unknown	<p>a) Internal action is required to assess the impact of reduction in unit numbers of floating support services. The proposed reductions have the potential to impact on access to services for older people with support needs as well as young people at risk.</p> <p>Other action will need to be taken with regard to the impact of bringing the expenditure per service user per week in extra care housing in line with that in sheltered accommodation and reducing expenditure on community alarms. This will have an impact on statutory stakeholders or service users themselves in having to fill the funding gap and there will be a dependency on eligibility criteria and an assessment in order to determine access. There will need to be a re-evaluation of the costs associated with service delivery.</p> <p>c) Supporting People continues to monitor and review services, including the age of those accessing them to ensure that older people with support needs and young people at risk can access the services they need</p>

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			Positive	Negative	
Disability	Yes – Reducing the level of floating support services and potentially restricting access could lead to less support being available to vulnerable people Yes – Reducing support hours and hourly rates in long term supported accommodation is likely to affect people with learning disabilities, people with physical disabilities and people with mental health problems more than other client groups.	Yes – by identifying specific support needs and ensuring services meet them as well as identifying gaps in services Yes – Retaining current levels of accommodation based services will continue to enable vulnerable people to have choice and live independently in the community. Yes – Money saved through reduction in cost of long term supported accommodation will enable the Programme to be targeted at its core business of delivering housing related support across a broad range of services within the 21 client groups the programme delivers services to with the end result that vulnerable people who are not eligible to receive a statutory service are not marginalised and excluded from society.	High	As yet Unknown	a) b) Internal action is required to assess the impact of reduction in unit numbers of floating support services. The proposed reductions have the potential to impact on access to services for specific clients groups, such as people with sensory disabilities and people living with HIV/Aids. Other action will need to be taken with regard to the impact of reducing support hours and hourly rates in long term supported accommodation. This will have an impact on statutory stakeholders or service users themselves in having to fill the funding gap and there will be a dependency on eligibility criteria and an assessment in order to determine access. There will need to be a re-evaluation of the costs associated with service delivery. c) Under contractual obligations all providers have to meet the particular communication needs of clients and thus can meet the housing related support needs of a wide range of client groups.
Gender	Yes – Reducing the level of floating support services and potentially restricting access could lead to less support being available to vulnerable people	Yes – by identifying specific support needs and ensuring services meet them as well as identifying gaps in services	High	As yet unknown	a) and b) Internal action is required to assess the impact of reduction in unit numbers of floating support services. The proposed reductions have the potential to impact on access to services for specific clients groups, such as women fleeing domestic abuse and teenage parents.

Characteristic	Could this policy, procedure, project or service affect this group differently from others in Kent? YES/NO	Could this policy, procedure, project or service promote equal opportunities for this group? YES/NO	Assessment of potential impact HIGH/MEDIUM/LOW/ NONE/UNKNOWN		Provide details: a) Is internal action required? If yes, why? b) Is further assessment required? If yes, why? c) Explain how good practice can promote equal opportunities
			Positive	Negative	
Gender (Cont.)		Yes - Commissioning of more services for women fleeing domestic abuse and teenage parents will help more women to access safe and secure accommodation. Less teenage parents will become homelessness and more will be enabled to stay in their areas of origin and near social networks. Yes – Retaining current levels of accommodation based services will continue to enable vulnerable people to have choice and live independently in the community.	High	As yet unknown	c) Supporting People continues to monitor the housing related support needs of those fleeing domestic abuse and where shortage of resources poses potential risks to clients' safety, the case for additional services is made.
Gender identity	No – Supporting People contracts explicitly demand that providers deal with issues of Equalities and meet the diverse needs of service users.	YES – by identifying specific support needs and ensuring that services use best practice in meeting the needs of people with gender identity issues.	High		c) Supporting People continues to monitor and review services, including fair access to services and that services use best practice in meeting the needs of people with gender identity issues.
Race	No – Current levels of accommodation based services, HIAs and handyperson services and community alarms are to be retained but at reduced cost. Yes – Reducing the level of floating support services and potentially not re-commissioning a BME specific service could lead to less support being available to BME communities	YES – by identifying specific support needs and ensuring that those needs are met within existing services or, if need is evidenced, commissioning specific services for specific Ethnic groupings.	High	As yet unknown	a) b) Internal action is required to assess the impact of reduction in unit numbers of floating support services. The proposed reductions have the potential to impact on access to services for particular BME groups. c) Supporting People continues to monitor and review services, including fair access to services and that services use best practice in meeting the needs of members of minority ethnic groups.

Characteristic	Could this policy, procedure, project or service affect this group differently from others in Kent? YES/NO	Could this policy, procedure, project or service promote equal opportunities for this group? YES/NO	Assessment of potential impact HIGH/MEDIUM/LOW/ NONE/UNKNOWN		Provide details: a) Is internal action required? If yes, why? b) Is further assessment required? If yes, why? c) Explain how good practice can promote equal opportunities
			Positive	Negative	
Religion or belief	No – The QAF requires providers to ensure that people’s beliefs are respected and that they are supported in accessing appropriate places of worship, where required	Yes – by identifying specific support needs and ensuring that those needs are met within existing services	High		c) Supporting People continues to monitor and review services, including fair access to services and that services use best practice in meeting the needs of members of minority ethnic groups.
Sexual orientation	No – The QAF requires providers to deal with issues of Equalities and meet the diverse needs of service users	YES – by identifying specific support needs and ensuring that services use best practice in meeting the needs of people with issues around sexual orientation	High		c) Supporting People continues to monitor and review services, including fair access to services and that services use best practice in meeting the needs of members of minority ethnic groups.
Pregnancy and maternity	See under gender	See under gender	High		

Part 1: INITIAL SCREENING

Context

The Programme commissions the provision of housing related support in a range of services including sheltered accommodation and floating support services. The programme is required to make savings of £7 million over the next two years in response to the adjustment of investment and the impact of the Comprehensive Spending Review 2010.

Achieving the savings involves reducing expenditure across all lines/services. At the same time, the Programme is implementing the priorities as set out in the Kent Supporting People Strategy 2010-2015. These priorities are confirmed as the following short term accommodation based services:

- Young people at risk schemes
- Refuges Single homeless scheme (Thanet)
- Substance misuse scheme
- Teenage parents

The majority of these schemes have floating support schemes that were commissioned in lieu of accommodation-based provision in order to safeguard investment for newly commissioned accommodation-based services. The Programme will ensure that the investment is secure for all of the schemes outlined above.

Aims and Objectives

The document proposes two options of which option two is recommended. Option one would have entailed a reduction in funding to all services of 22% irrespective of strategic priorities. This option could materially affect the viability of services within the Programme. The Commissioning Body supported in principle the adoption of Option Two, once the Core Strategy Group is satisfied that the impact assessment in relation to Option Two is satisfactory.

Option Two is a more strategic approach which reflects more accurately the outcomes that the Programme has been set up to achieve and includes a combination of efficiency measures as already identified in the Supporting People Strategy 2010-2015. In essence, applying efficiency measures means continuing to deliver services at the same level but with less money. The objectives guiding the proposals can be summed up as follows:

- To target funding at the Programme's core business which is housing related support and is primarily targeted at short term outcome focused interventions in order to facilitate re-engagement in the social fabric of the county;
- To target funding at the most vulnerable and those at greatest risk ;
- To maximise value for money including reducing provider cost and weekly support hours delivered;

- To minimise the impact on high cost statutory services where there is a reduction in the weekly support hours in long term services ;
- To ensure that strategically relevant accommodation-based services are not closed
- To ensure that floating support services are retained but at reduced capacity and cost ;
- To reconfigure the procurement of services for different client groups where appropriate to achieve economies of scale ;

A full impact assessment on the Supporting People Strategy 2010-2015 was carried out in 2010 and was signed off by the directorate lead for equalities. The Strategy (and the proposals contained within it) was widely consulted on, including with service users.

However, the savings proposals for reductions in the expenditure on extra care sheltered accommodation, community alarms, long term supported accommodation and reductions in the level of floating support services go beyond what was proposed in the strategy and had been consulted on then. Therefore there needs to be an additional consultation on the implementation of the savings proposals.

Beneficiaries

The beneficiaries of the Programme are vulnerable people in need of housing related support services in Kent as defined in the Kent Supporting People Eligibility Policy. They include:

- single homeless people with support needs and rough sleepers
- older people with support needs
- people with disabilities
- people with mental health problems
- families with support needs and teenage parents
- young people at risk and care leavers
- ex-offenders
- people at risk of domestic abuse
- people with alcohol and/or drug problems

More than half of grant is spent on older people with support needs, people with learning disabilities, people with mental health problems and people with physical/sensory disabilities. Currently, three of the four groups not only attract the three highest grant spends by client group but, excluding generic floating support services, also the highest contracted unit numbers. Support for both older people and people with learning disabilities is predominantly provided through accommodation based services.

Consultation and data

The proposals for efficiency measures already contained within the Kent Supporting People Strategy 2010-15 were widely consulted upon and included a wide range of data including client records, needs analysis and

outcomes of extensive consultation with key stakeholders including service users. This Equality Impact Assessment utilises the full customer impact assessment carried out on the strategy.

Any Provider commissioned by the SP Team to provide one or more of the proposed services will be awarded a contract which is monitored through the Quality Assessment Framework (QAF). The QAF has clear and explicit standards to ensure that all Supporting People -funded services are inclusive to all members of the community. All contracts have clauses requiring providers to work within the Equality act 2010 and the Human Rights Act 1998. Providers must all have an equal opportunities policy that complies with all statutory obligations as stipulated by the Equality and Human Rights Commission as far as possible.

The most recent consultations and discussions with key stakeholders about the savings proposals took place within the Provider Forum, the Core Strategy Group and the Commissioning Body. As already indicated elsewhere, the savings with regard to floating support go beyond what was agreed in the Kent Supporting People Strategy 2010-15.

The 'Delivering the Savings Proposals' report includes an Impact Assessment outlining the financial impact of the savings on services for the client groups the Programme provides a service to.

Potential Impact

In general terms, the initial screening shows that in relation to people with the protected characteristics there will be no impact on the level of service provision to the different client groups in accommodation based services, Home Improvement Services, handyperson services or community alarms. Services will continue to be delivered at current levels of unit numbers albeit at reduced cost and the proposed measures do not impact disproportionately on any groups of people with the protected characteristics.

In extra care sheltered accommodation it is proposed to bring costs in line with expenditure per service user per week in sheltered accommodation. It is also proposed to reduce expenditure on community alarms. These measures could impact on service users as well as other stakeholders in the Programme.

In long term housing it is proposed to adjust the number of weekly support hours down over a two year period. This reflects the Programme's need to target its resources on its core business of housing related support in order to continue supporting as wide a range of vulnerable people as possible. It also reflects a more realistic apportioning of cost between housing related support and care. This will affect services for people with disabilities. In addition, it is proposed to reduce hourly rates to bring them in line with the rates in short term accommodation based services. These measures might not only have an impact on service users themselves but also statutory services such as Adult Social Services.

Floating Support will be retendered in 2011/12 and is the only type of housing related support where the level of service provision will need to be reduced within the funding available in 2012/13. Reductions will affect all client groups. No detailed proposals as to the reduction of specific floating support services have as yet been made. A report setting out proposals will be submitted to the governing bodies in May and June 2011.

Adverse Impact:

1) Long term and short term accommodation based supported housing:

A review of the proposals has been considered and based on the information currently available in terms of overall level of service provision no adverse impacts have been identified that may affect one group of people with the protected characteristics disproportionately more than others.

However, there might be adverse impacts on individual service users and statutory services that might be required to fill the funding gap. Providers may need to rethink the nature of service delivery within services to meet these challenges.

2) Community alarms

A review of the proposals has been considered and based on the information currently available in terms of overall level of service provision no adverse impacts have been identified that may affect one group of people with the protected characteristics disproportionately more than others.

However, there might be adverse effects on the individual service users in terms of the levels of service delivery and the providers' ability to adhere to prescribed quality standards. This may lead to lines being remotely tested and quality standards being diluted.

3) Home Improvement Agencies and handyperson services:

A review of the proposals has been considered and based on the information currently available no adverse impacts have been identified that may affect one group of people with the protected characteristics disproportionately more than others.

3) Floating support services:

The savings proposals indicate a significant overall reduction in floating support services which could have an adverse impact that could affect some groups of people with the protected characteristics more than others. The Supporting People Programme monitors and reviews the services it commissions to ensure that they are accessible to the vulnerable people who need them irrespective of race, religion, gender identity, and sexual orientation. Therefore, potential adverse impacts could only affect the

protected characteristics of age, disability, race (where services are focused on particular BME groups) and gender (where services are focused on those fleeing domestic abuse and teenage parents).

Positive Impact:

The proposals are balanced between a need for achieving maximum value for money and ensuring that services remain viable. Where accommodation based services, Home Improvement Agencies, handyperson services and community alarms are concerned, services are being retained at current levels albeit at reduced cost. This ensures that the Programme will be able to retain floating support services albeit at a reduced level compared with historical investment.

There will be new commissioning of accommodation based services for young people at risk linking up supported housing services more flexibly as a unified service for vulnerable young people including care leavers and young offenders. Other new accommodation based services to be commissioned are for teenage parents, women fleeing domestic abuse, people misusing substances and single homeless people with support needs.

Supporting People continues to monitor and review services through the Quality Assessment Framework and contractual obligations which oblige providers to ensure that services are accessible to all who need them and do not discriminate against minorities such as people from Ethnic Minorities or lesbian, gay, bisexual or transgender (LBGT) people.

JUDGEMENT

Option 2 – Internal Action Required YES

Where levels of service provision in long term supported accommodation, extra care sheltered accommodation and community alarms are concerned, strategically relevant services will continue to be delivered at current levels and therefore no groups are directly or indirectly excluded from benefitting, where applicable, from Supporting People services. Savings are to be made through efficiency measures such as value for money. Some of the measures were consulted on and agreed during the development of the Kent Supporting People Strategy 2010-15.

However, some of the proposed reductions in expenditure have the potential to impact on individual service users in terms of having to contribute more to the cost of their services or other stakeholders such as Adult Social Services being asked to fill the funding gap via individual assessment.

In relation to floating support, there is potential for adverse impact on particular groups and we have found scope to improve the proposal. The 'Delivering the Savings Proposals' report does not detail the reductions in

floating support services. The work is currently being undertaken and detailed proposals will be made in a report going to the governing bodies in May/June 2011.

The detailed proposals will need to be consulted on and a further screening will be carried out. The action plan is attached as appendix 1.

Sign Off

I have noted the content of the equality impact assessment and agree the actions to mitigate the adverse impact(s) that have been identified.

Senior Officer

Signed:

A handwritten signature in black ink, appearing to read 'Claire Martin', written in a cursive style.

Date: 4 March 2011
Name: Claire Martin
Job Title: Head of Supporting People

Directorate Equality Lead

Signed:

A handwritten signature in black ink, reading 'Mary Blanche', written in a cursive style.

Date:
Name: Mary Blanche

Appendix One - Equality Impact Assessment Action Plan

Protected Characteristic	Issues identified	Action to be taken	Expected outcomes	Owner	Timescale	Cost implications
Age	Reduction in overall provision of floating support services	Consultation with service users and providers	Agreed proposals	Supporting People	March/April 2011	None
		Equality Impact Assessment on detailed proposals for new floating support services to be commissioned	Agreed proposals	Supporting People	May 2011	None
	Reduction in expenditure per service user per week in extra care sheltered accommodation	Joint assessment of individual service users between Supporting People and Adult Social Services	Kent Adult Social Services will jointly assess service users with the SP Programme and will determine whether or not social care input can be increased or whether alternative interventions from the voluntary or health sectors can be delivered	Supporting People Adult Social Services Service Providers Health Voluntary Sector	March 2012	Additional hours from a member of the SP Team

Protected Characteristic	Issues identified	Action to be taken	Expected outcomes	Owner	Timescale	Cost implications
	Reduction in weekly payments in relation to community alarms	There have been initial discussions with providers and key stakeholders. Further work will be undertaken in order to adjust the expectations in terms of service delivery in relation to alarms.	Weekly expenditure will be reduced. There may be a remote service applied rather than weekly visits. The specification may no longer require specific quality standards.	Supporting People Key stakeholders Service providers	March 2012	None
Disability	Reduction in overall provision of floating support services	Consultation with service users and providers	Agreed proposals	Supporting People	March/April 2011	None
		Equality Impact Assessment on detailed proposals for new floating support services to be commissioned	Agreed proposals	Supporting People	May 2011	None
	Reductions in hourly rates and weekly support hours in long term supported accommodation	Joint assessment of individual service users between Supporting People and Adult Social Services	Adult Social services and Supporting People will conduct joint assessments to determine whether or not individuals	Supporting People Adult Social Services Service Providers	March 2012 and March 2013	Additional hours from a member of the SP Team

