

## **EQUALITY IMPACT ASSESSMENT**

The **Equality Act 2010** places a '**General Duty**' on all public bodies to have '**due regard**' to the need to:

- Eliminating discrimination, harassment and victimisation and any other conduct prohibited under the Act;
- Advancing equality of opportunity between those with a 'relevant protected characteristic' and those without one;
- Fostering good relations between those with a 'relevant protected characteristic' and those without one.

In addition the Council complies with the Marriage (same sex couples) Act 2013.

### **Stage 1 – Screening**

Please complete the equalities screening form. If screening identifies that your proposal is likely to impact on protect characteristics, please proceed to stage 2 and complete a full Equality Impact Assessment (EqIA).

### **Stage 2 – Full Equality Impact Assessment**

An EqIA provides evidence for meeting the Council's commitment to equality and the responsibilities under the Public Sector Equality Duty.

**When an EqIA has been undertaken, it should be submitted as an attachment/appendix to the final decision making report. This is so the decision maker (e.g. Cabinet, Committee, senior leader) can use the EqIA to help inform their final decision. The EqIA once submitted will become a public document, published alongside the minutes and record of the decision.**

Please read the Council's Equality Impact Assessment Guidance before beginning the EqIA process.

<b>1. Responsibility for the Equality Impact Assessment</b>	
<b>Name of proposal</b>	Approval of the new LD Day Opportunities model following public consultation
<b>Service area</b>	Learning Disabilities
<b>Officer completing assessment</b>	Sebastian Dacre
<b>Equalities/ HR Advisor</b>	Melissa Nalubwama-Mukasa
<b>Cabinet meeting date (if applicable)</b>	9 <sup>th</sup> March 2021
<b>Director/Assistant Director</b>	Charlotte Pomery

## 2. Summary of the proposal

*Please outline in no more than 3 paragraphs*

- *The proposal which is being assessed*
- *The key stakeholders who may be affected by the policy or proposal*
- *The decision-making route being taken*

Following a public consultation with stakeholders carried out between 9<sup>th</sup> December 2020 and 19<sup>th</sup> January 2021 the proposals for a new model of delivering day opportunities will be going to March 2021 Cabinet to seek approval to implement the proposals.

The consultation asked respondents their views on proposals A-E:

- Proposal A: Turn Ermine Road into a specialist hub for people with profound learning, physical and multiple disabilities.
- Proposal B: Decommission the autism support service at Ermine Road
- Proposal C: Develop an independence pathway
- Proposal D: Following a review for some autistic service users currently attending Ermine Road or out of borough placements to move to the new provision at Waltheof Gardens
- Proposal E: Bring some of those receiving specialist day opportunities back in the borough

The consultation feedback was generally in favour of the new day opportunity proposals. (See section 4b below)

### **What will this mean:**

These proposals will mean that adults with learning disabilities who do not have profound learning, physical and multiple disabilities who currently attend Ermine Road may have their day opportunities delivered differently.

Those receiving specialist day opportunities out-of-borough and have either a profound learning, physical and multiple disabilities or autism may have their day opportunities delivered in the borough at one of the new specialist services.

### **Key Stakeholders**

- Current service Users of learning disabilities day opportunities provision
- Carers of current service user of learning disabilities day opportunities
- Future users and their carers of learning disabilities day opportunities provision

## 3. What data will you use to inform your assessment of the impact of the proposal on protected groups of service users and/or staff?

*Identify the main sources of evidence, both quantitative and qualitative, that supports your analysis. Please include any gaps and how you will address these*

*This could include, for example, data on the Council's workforce, equalities profile of service users, recent surveys, research, results of relevant consultations, Haringey Borough Profile, Haringey Joint Strategic Needs Assessment and any other sources of*

*relevant information, local, regional or national. For restructures, please complete the restructure EqIA which is available on the HR pages.*

Protected group	Service users	Staff
Sex	Haringey Needs assessment: adults and children with Autism. Public Health. Haringey Council 2017  PANSI Projecting Adult Needs and Service Information  Mosaic Data Haringey GLA 2017 projections  Carers First Data	N/A
Gender Reassignment	Current data on service users does not breakdown by gender reassignment.	N/A
Age	Haringey Needs assessment: adults and children with Autism. Public Health. Haringey Council 2017  PANSI Projecting Adult Needs and Service Information  Mosaic Data Haringey GLA 2017 projections	N/A
Disability	Stakeholder engagement through the ASC redesign group and the Joint Adults Partnership Board Reference Groups.  Haringey Needs assessment: adults and children with Autism. Public Health. Haringey Council 2017  PANSI Projecting Adult Needs and Service Information	N/A
Race & Ethnicity	Mosaic data Haringey GLA 2017 projections	N/A
Sexual Orientation	Current data on service users does not breakdown by sexual orientation.	N/A
Religion or Belief (or No Belief)	Current data on service users does not breakdown by religion or belief.	N/A
Pregnancy & Maternity	Current data on service users does not breakdown by pregnancy & maternity.	N/A
Marriage and Civil Partnership	Current data on service users does not breakdown by marriage and Civil Partnership.	N/A

**Outline the key findings of your data analysis. Which groups are disproportionately affected by the proposal? How does this compare with the impact on wider service users and/or the borough's demographic profile? Have any inequalities been identified?**

*Explain how you will overcome this within the proposal.*

*Further information on how to do data analysis can be found in the guidance.*

The key source of the data is from PANSI (Projecting Adult Needs and Service Information), Mosaic (the adult social care database) and 2011 Borough Census, details of which are detailed below.

The key findings for Haringey are:

### Sex

- From the Census, the data shows that there are slightly more female residents than male residents in Haringey, with a 51/49 split;
- Mosaic data shows that there are proportionally more males with a learning disability than females compared with the general population.
- Mosaic data shows that there are more males with a learning disability than females currently receiving services with a 56/44 percentage split.
- PANSI data shows that there are approximately 10 times as many working-aged male adults with autism than working-aged female adults.
- Carers First Data shows that the majority of carers are female (75%)

### Mosaic Data

	LD	ASC	GLA
Male	56%	48%	51%
Female	44%	52%	49%

### PANSI Projections

Autistic spectrum disorders by gender	2019	2020	2025	2030	2035
<a href="#">Show all people</a> <a href="#">Show all people</a>					
Males aged 18-24 predicted to have autistic spectrum disorders	216	212	211	225	232
Males aged 25-34 predicted to have autistic spectrum disorders	506	504	486	468	481
Males aged 35-44 predicted to have autistic spectrum disorders	479	488	506	497	479
Males aged 45-54 predicted to have autistic spectrum disorders	347	351	382	421	439
Males aged 55-64 predicted to have autistic spectrum disorders	220	232	274	297	320
<b>Total males aged 18-64 predicted to have autistic spectrum disorders</b>	<b>1,768</b>	<b>1,787</b>	<b>1,858</b>	<b>1,908</b>	<b>1,951</b>
Females aged 18-24 predicted to have autistic spectrum disorders	22	22	22	24	25

Females aged 25-34 predicted to have autistic spectrum disorders	52	51	49	47	48
Females aged 35-44 predicted to have autistic spectrum disorders	47	47	48	46	44
Females aged 45-54 predicted to have autistic spectrum disorders	37	37	38	40	41
Females aged 55-64 predicted to have autistic spectrum disorders	28	29	32	33	34
<b>Total females aged 18-64 predicted to have autistic spectrum disorders</b>	<b>186</b>	<b>187</b>	<b>189</b>	<b>190</b>	<b>192</b>

### Gender Reassignment

- Data for adults with learning disabilities, autism does not break down by gender reassignment. There is no data to suggest that this protected characteristic group would be disproportionately negatively impacted by this proposal, however if this changes we will investigate further to address any negative impact.
- During the consultation, no stakeholder identified as transgender.

### Age

- Pansi data for those with severe LD - 17% are aged 18-24, 28% between ages 25-34, 29% between ages 35 -44 15% between ages 45-54 and 11% between ages 55-64.

### Mosaic Data

	LD		ASC		Haringey Equalities profile
18 -64	91%	18-20	2%	0-4	7.1%
65+	9%	21-24	3%	5-9	6.2%
		25-29	4%	10-14	6.0%
		30-44	12%	15-19	5.6%
		45-59	20%	20-24	7.4%
		60-64	7%	25-29	11.0%
		65-74	12%	30-34	11.2%
		75-84	18%	35-39	8.9%
		85-90	11%	40-44	7.9%
		90+	9%	45-49	6.9%
				50-54	5.3%
				55-59	4.2%
				60-64	3.6%
				65-69	2.6%
				70-74	2.3%
				75-79	1.8%
				80-84	1.1%
				85-89	0.6%
				90-94	0.3%

				95-100	0.1%
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## PANSI Data

### LD - Severe

People aged 18-64 predicted to have a severe learning disability, and hence likely to be in receipt of services, by age, projected to 2035

Show next five years

Show next five years

	2019	2020	2025	2030	2035
People aged 18-24 predicted to have a severe learning disability	48	48	48	52	53
People aged 25-34 predicted to have a severe learning disability	81	80	77	74	76
People aged 35-44 predicted to have a severe learning disability	83	85	87	85	82
People aged 45-54 predicted to have a severe learning disability	44	45	48	53	54
People aged 55-64 predicted to have a severe learning disability	30	31	36	38	40
<b>Total population aged 18-64 predicted to have a severe learning disability</b>	<b>287</b>	<b>289</b>	<b>296</b>	<b>301</b>	<b>306</b>

### Disability

- Census - An estimated 5,700 Haringey residents aged 14 and over are estimated to have a learning disability, and around 2,100 residents are estimated to have autism.
- The new proposals would increase local services for adults with learning disabilities.

### Race and Ethnicity

- Black / African / Caribbean / Black British are disproportionately over-represented receiving an LD service (36%) compared to the general population (18.7%).
- White are disproportionately under-represented (47%) compared to the general population.

### Mosaic Data

	LD	ASC	Haringey Equalities Profile
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Asian / Asian British	8%	7%	9.5%
Black / African / Caribbean / Black British	36%	34%	18.7%
Mixed / multiple	3%	2%	6.5%
No data	1%	6%	0%
Other Ethnic Group	5%	4%	4.8%
White	47%	46%	60.4%

This proposal will have a positive impact on current and future service users of Day opportunities and their families. This will provide day opportunities to support service users to access a range of activities and specialist support in their community. This will support service users and their families to lead a normal and valued life in the community.

#### **4. a) How will consultation and/or engagement inform your assessment of the impact of the proposal on protected groups of residents, service users and/or staff?**

*Please outline which groups you may target and how you will have targeted them*

Further information on consultation is contained within accompanying EqlA guidance

A public consultation on the proposals for a new delivery model for day opportunities for adults with learning disabilities with stakeholders was carried out between 9<sup>th</sup> December 2020 and 29<sup>th</sup> January 2021 (including a one-week extension to allow for late feedback)

360 current and future users and their families and carers were directly written to. The letter included information about the proposals as well as a survey. An easy read version of this was also provided.

11% of those notified of the consultation returned a completed survey. 5.5% of those notified about the consultation attended a consultation meeting. 20% of those notified of the consultation were contacted by officers.

Due to Covid 19 the Council was unable to hold meetings in person and instead six online meetings were held; five by the Council via Microsoft Teams and a further meeting held by Public Voice CIC on behalf of the Council via Zoom. Council officers attended all these meetings.

76 other residents were contacted individually by the Council.

Overall, there were 135 contacts but these were not all unique users. Some respondents wanted to feedback in more than one way and some surveys were anonymous.

#### **4. b) Outline the key findings of your consultation / engagement activities once completed, particularly in terms of how this relates to groups that share the protected characteristics**

*Explain how will the consultation's findings will shape and inform your proposal and the decision making process, and any modifications made?*

#### Proposal A – Ermine Road Profound and Multiple Learning Disability Service

- The survey response showed that 50% thought that the proposal A was better than the current model. 22% were neutral and 28% felt that proposal A would be worse.
- Half of respondents were in favour of the change.
- Nearly twice as many people were in favour of this change as against it.

#### Proposal B - Decommissioning the autism support service

- The survey response showed that 58% thought that the proposal B was better than the current model. 28% were neutral and 14% felt that proposal B would be worse.
- Nearly 3/5 of respondents thought this proposal would make a better service. Over 4 times as many respondents were in favour as against Proposal B. The comments below however appear to show some of the worries from people that may be affected by the closure of the autism service at Ermine road. Many others' responses were more positive but potentially less likely to be directly impacted by the closure.

#### Proposal C - Independence Pathway

- The survey response showed that 44% thought that the proposal C was better than the current model. 31% were neutral and 25% felt that proposal C would be worse.
- Slightly less than twice as many respondents thought this would be better than the existing day opportunities model. A quarter of respondents felt this proposal would be for the worse. This was the most negative score out of all the proposals. There were a number of concerns and anxieties about this proposal and we are working with users and families to address these.

#### Proposal D - Haringey Opportunities Project - Complex Autism and Learning Disability Hub

- The survey response showed that 53% thought that the proposal D was better than the current model. 36% were neutral and 11% felt that proposal D would be worse.
- There were nearly 5 times as many respondents in favour of the proposal as against it.

#### Proposal E - Out of Borough Users

- The survey response showed that 44% thought that the proposal E was better than the current model. 42% were neutral and 14% felt that proposal E would be worse.



- Over 3 times as many respondents thought that proposal E would be better compared to the number of respondents who thought it was worse. Two out of five respondents were neutral on this proposal which was the most for all the proposals.

### **Key themes to reflect on and/ or reassure families from the consultation:**

- **The need for building based provision** Respondents reiterated again and again the importance to them of buildings and the need for a base. Some respondents were under the impression that the changes meant that building would be closing when actually the opposite is the case with the changes leading to more building-based day opportunity capacity being created in the borough.
- **Good planning around the changes** All day opportunities users will have a Care Act review prior to any changes taking effect. These will be done in a person-centred way involving users, families and wherever possible their wider circle of support. This will also ensure that those who are unable to communicate verbally will still have their views communicated by those who know them best and can advocate on their behalf. A transition period will be put in place arranged on an individual basis depending on what works best for them.
- **Relationships** There is a fear of users falling into loneliness and depression if their service changes. Particularly for those in Proposal C The Independence Pathway. Any changes to people's service will be carefully managed to value and maintain meaningful relationships. We know that for many people the most important outcome they derive from a day opportunity is friendship and reduced risk of isolation so we will work with families during the review process and friendship groups through working groups to ensure that this does not happen.
- **The Care Act:** Any changes that take place will be lawful and will be Care Act compliant.
- **Co-designing day opportunities with users and families:** Involving service users and families in the changes is key to developing the model. The Council is committed to continuing to co-design the new model with all interested stakeholders.
- **Capacity:** There were concerns around the capacity of building based autism support in the borough, but the changes will mean that initially this will be at least doubling existing provision. The new capacity will provide the opportunity for out of borough users to be supported in the borough and for new users coming through transition to access the service.
- **Safeguarding:** There was a concern about who would be overseeing the care worker(s) under the proposal for The Independence Pathway. It is important that services users, families, and the circle of support are involved in recruiting staff as relationships are key. The management of care workers also needs to be robust with consistent staffing. The Council will still be responsible for its duty of care for service user and safeguarding concerns can be raised with the Council's safeguarding team.
- **Monitoring:** Carers queried how would officers know that the outcomes are being met within the Independence Pathway. Moving from coordinated support at a centre to the community could mean some people are not supported well and no-one picks up on it. The council will be coproducing the model and it is important that service users, families and the circle of support are involved as closely as possible in the planning of the new service.
- **Transportation:** A number of respondents were concerned about continuing to be picked up by a white minibus. The Council will be working with service users and families to ensure

that the most suitable transport option is considered when planning the new model but with an emphasis on increasing independence and not over prescribing support.

- **Independence Pathway** Many of the concerns raised above relate directly to Proposal C. Despite the fact that it received overall support and was considered to be better than the current offer, we intend to address and mitigate the concerns raised as a result of the consultation. Council officers are reviewing our plans for this proposal. We are looking to try and incorporate one or more building bases for this group in the community, we want to try and provide some consistent staff for the group to help with monitoring and coordination and will continue to ensure that changes are focused on friendship groups and activities that are meaningful. We absolutely do not want any changes to unintentionally lead to isolation or poor outcomes for people. We will be working with stakeholders and affected families to co-design the improvements to the Independence Pathway.

## 5. What is the likely impact of the proposal on groups of service users and/or staff that share the protected characteristics?

*Please explain the likely differential impact on each of the 9 equality strands, whether positive or negative. Where it is anticipated there will be no impact from the proposal, please outline the evidence that supports this conclusion.*

Further information on assessing impact on different groups is contained within accompanying EqIA guidance

### 1. Sex

The data indicates a higher proportion of males have a learning disability, however for this service the needs assessment is the principal route to determining take-up of the service regardless of a person's sex. While men can be expected to benefit more from the new service, men and women will be treated equally. We know that women are overrepresented as carers, compared to men as shown by the Carers First data. We will continue to ensure through the review process that carers are continued to be supported.

Positive	x	Negative		Neutral impact		Unknown Impact	
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### 2. Gender reassignment

There is no service data for this characteristic, and so we are therefore unable to assess the impact of this proposal. During the consultation, no stakeholder identified as transgender. There was no evidence of any inequalities arising based on this protected characteristic if during the implementation we become aware of any impact the Council will take appropriate steps to address

Positive		Negative		Neutral impact		Unknown Impact	x
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### 3. Age

Day Opportunities is for working aged adults. The needs assessment is the principal route to determining take up of day opportunities. No negative impact is anticipated for young people or older people.

The proposal will provide day opportunities for working aged adults. There is a significant cohort of 'young-older' people who access day opportunities. Pansi Data shows that for those with severe learning disabilities 17% are aged 18-24, 28% between ages 25-34, 29% between ages 35 -44 and 15% between ages 45-54. This shows that the proposals will have a positive impact especially on those aged between 25 – 44. The Specialist service will collect a range of data, which will inform decisions about how to support 'young-older' people with learning disability/autism in recognition that it is often challenging for them to receive autism support and care.

Positive	x	Negative		Neutral impact		Unknown Impact	
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### 4. Disability

All of those who are provided with day opportunities have a learning disability and behaviours that can be challenging. The proposals are for an increase in day opportunities within the borough and will therefore have a significantly positive impact on this protected characteristic group. The physical environment of the service will be fully wheelchair accessible and be designed with autistic and learning-disabled people in mind.

Positive	x	Negative		Neutral impact		Unknown Impact	
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### 5. Race and ethnicity

Mosaic data shows that those from Black / African / Caribbean / Black British are overrepresented in receiving an LD service compared to the wider population. The profile of the users to take up for the Day opportunity is disproportionately in favour of Black, Asian and minority ethnic users compared with both the wider user and population ethnic mix, meaning that this group will benefit most from this proposal.

In recognising the particular difficulties that are faced by people from Black, Asian and minority ethnic communities with learning disabilities and autism, such as broader environmental influences and cultural factors. The proposal will positively impact this group and will ensure equitable access to relevant autism and learning disability support services.

Positive	x	Negative		Neutral impact		Unknown Impact	
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**6. Sexual orientation** There is no service data for this characteristic, and so we are therefore unable to assess the impact of this proposal. During the consultation we

captured information about sexual orientation. No issue was identified around the impact of the proposals on this protected characteristic.

Positive		Negative		Neutral impact		Unknown Impact	x
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### 7. Religion or belief (or no belief)

We do not currently have any reliable data on the religion and beliefs of the service users. For this service, the needs assessment is the principal route to determining take up of the service. People will be treated the same regardless of religion or belief. There is no reason to anticipate any negative impacts for any individual or group associated with their religion or belief. The development of the service will include data collection improvements which will give us better information about this characteristic for future analysis.

Positive		Negative		Neutral impact		Unknown Impact	x
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**8. Pregnancy and maternity** There is no service data for this characteristic, and so we are therefore unable to assess the impact of this proposal. During the consultation, no stakeholder identified under this protected characteristic. There was no evidence of any inequalities arising based on this protected characteristic. if during the implementation we become aware of any impact the Council will take appropriate steps to address them.

Positive		Negative		Neutral impact		Unknown Impact	x
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**9. Marriage and Civil Partnership** Data on marriage and civil partnership status among people with a learning disability with autism and behaviours that may be challenging is not available. During the consultation, no stakeholder identified under this protected characteristic. There was no evidence of any inequalities arising based on this protected characteristic. if during the implementation we become aware of any impact the Council will take appropriate steps to address

Positive		Negative		Neutral impact		Unknown Impact	x
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### 10. Groups that cross two or more equality strands e.g. young black women

As outlined above the overall service is to provide day opportunities service users who have a learning disability and autism. The needs assessment is the principal route to determining take up of the service and any groups that cross two or more equality strands with an assessed need will benefit from this service. The majority of people accessing this service are likely to have two or more protected characteristics, and the service will be designed with the particular needs and experiences of the following people, who are over-represented or whose outcomes are known to be poorer, groups that are likely to be overrepresented among service users include:

- Black Afro-Caribbean and Asian minority ethnic residents with disabilities, including learning disabilities and autism.

In recognising the particular difficulties that are faced by people from Black, Asian, minority ethnic backgrounds with learning disabilities and autism. The proposal will positively impact those who identify with the protected characteristic of ethnicity and disability as often this group does not receive appropriate autism and learning disability services. In the implementation of the proposal, we have taken steps to prevent information often only being available in English, few translation services and professionals' use of jargon, which often presents barriers in accessing appropriate support for groups who share the protected characteristic of disability and ethnicity.

**Outline the overall impact of the policy for the Public Sector Equality Duty:**

- **Could the proposal result in any direct/indirect discrimination for any group that shares the relevant protected characteristics?**
- **Will the proposal help to advance equality of opportunity between groups who share a relevant protected characteristic and those who do not?**

**This includes:**

- a) Remove or minimise disadvantage suffered by persons protected under the Equality Act
- b) Take steps to meet the needs of persons protected under the Equality Act that are different from the needs of other groups
- c) Encourage persons protected under the Equality Act to participate in public life or in any other activity in which participation by such persons is disproportionately low
- **Will the proposal help to foster good relations between groups who share a relevant protected characteristic and those who do not?**

The proposals will not lead to any direct or indirect discrimination against any group sharing a protected characteristic. The proposals will encourage adults with learning disabilities to be more involved in their local communities.

In summary the proposals will positively respond to the needs of users with learning disabilities, autism and behaviour challenges, a group who would otherwise not be able to live the community in Haringey. Implementation of the proposal will increase the local offer for adults with learning disabilities.

**6. a) What changes if any do you plan to make to your proposal as a result of the Equality Impact Assessment?**

Further information on responding to identified impacts is contained within accompanying EqIA guidance

Outcome	Y/N
<b>No major change to the proposal:</b> the EqIA demonstrates the proposal is robust and there is no potential for discrimination or adverse impact. All opportunities to promote equality have been taken. <u>If you have found any inequalities or negative impacts that you are unable to mitigate, please provide a compelling reason below why you are unable to mitigate them.</u>	N
<b>Adjust the proposal:</b> the EqIA identifies potential problems or missed opportunities. Adjust the proposal to remove barriers or better promote equality.	N

Clearly <u>set out below</u> the key adjustments you plan to make to the policy. If there are any adverse impacts you cannot mitigate, please provide a compelling reason below			
<b>Stop and remove the proposal:</b> the proposal shows actual or potential avoidable adverse impacts on different protected characteristics. The decision maker must not make this decision.			N
<b>6 b) Summarise the specific actions you plan to take to remove or mitigate any actual or potential negative impact and to further the aims of the Equality Duty</b>			
<b>Impact and which relevant protected characteristics are impacted?</b>	<b>Action</b>	<b>Lead officer</b>	<b>Timescale</b>
Increased anxiety for some users and carers.	<p>The service will communicate the findings of the consultation with all stakeholders.</p> <p>The Council is committed to coproducing all of these proposals with users and families, particularly where concerns have been raised to ensure we get it right.</p>	Georgie Jones -Conaghan/ Brickchand Ramruttun	<p>March 2021</p> <p>April 2021 – December 2021</p>
<b>Please outline any areas you have identified where negative impacts will happen as a result of the proposal but it is not possible to mitigate them. Please provide a complete and honest justification on why it is not possible to mitigate them.</b>			
N/A			
<b>6 c) Summarise the measures you intend to put in place to monitor the equalities impact of the proposal as it is implemented:</b>			
<p>All users will be regularly reviewed by The Haringey Learning Disabilities Partnership. Those who have a change of service will receive a 6-week review as well as the statutory annual review.</p> <p>The new services will be monitored by the Adult Social Care redesign day opportunities working group as well as by the Adults Joint Partnership Board. These groups have stakeholder representation.</p>			

<b>7. Authorisation</b>	
EqlA approved by .....	

(Assistant Director/ Director)	Date .....
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<b>8. Publication</b> <i>Please ensure the completed EqlA is published in accordance with the Council's policy.</i>

Please contact the Policy & Strategy Team for any feedback on the EqlA process.

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