



Haringey Council

Equality Impact Assessment

Name of Project	Learning Disabilities Day Centres	Cabinet meeting date If applicable	16/12/2014 10/02/2015 16/06/2015 11/11/2015
Service area responsible	Adult Social Services		
Name of completing officer	Donna Simeon	Date EqIA created	Draft 07/11/2014 Draft revised June 2015 Draft revised October 2015
Approved by Director / Assistant Director		Date of approval	02/11/2015

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

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

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

Haringey Council also has a 'Specific Duty' to publish information about people affected by our policies and practices.

All assessments must be published on the Haringey equalities web pages. All Cabinet papers **MUST** include a link to the web page where this assessment will be published.

This Equality Impact Assessment provides evidence for meeting the Council's commitment to equality and the responsibilities outlined above, for more information about the Council's commitment to equality; please visit the Council's website.

Stage 1 – Names of those involved in preparing the EqlA	
1. Provider Manager – Pauline Simpson	5.
2. Transformation Project Manager – Donna Simeon	6.
3. Policy & Equalities – William Shanks	7.
4. Human Resources – Cynthia Scott-Carnegie	8.

Stage 2 - Description of proposal including the relevance of the proposal to the general equality duties and protected groups. Also carry out your preliminary screening (Use the questions in the Step by Step Guide (The screening process) and document your reasoning for deciding whether or not a full EqlA is required. If a full EqlA is required move on to Stage 3.

The recommendations:

- 1) Closure of Roundways, Birkbeck Road and Always day centres that provide day services for adults with learning disabilities.**
- 2) Delivering a new model of day opportunities for adults with Learning Disabilities from Ermine Road Day Centre, through an alternative provider.**

It is our proposal to continue to move away from buildings based day opportunities within the borough for people with a learning disability and to continue to develop access to mainstream activities – these include local leisure, educational and employment opportunities. We recognise that people with specific needs will require a building base to support them at particular times and we are proposing to retain the use of Ermine Road Day Centre as part of the delivery of Learning Disability day opportunities in Haringey.

It is acknowledged that families/carers will be impacted by the proposed changes as well as service users themselves. We do not underestimate the anxiety and concern that may be felt by residents about these proposals. Our engagement and consultation with carers as well as service users has helped us better understand any negative impact that the proposals might have on individuals and how we might reduce this. The Cabinet report 'Corporate Plan Priority 2 - Outcome of Consultation and decision on proposals relating to adult services' November 2015, considers how individual needs can be accounted for and how we can mitigate any possible negative impacts.

The Birkbeck and Always sites provides day services for people with mild to moderate learning disabilities. This ranges from people who are independent and require minimal support to people with mobility and communication needs whom require support to access mainstream services. The service at Roundway provides day services for people with autistic spectrum disorders. The service at Ermine Road currently provides services for adults with complex needs.

Along side the recommendation to transform the day opportunities for adults with a Learning Disability, we will work with residential and supported living providers currently commissioned to provide 24 hour support to service users currently accessing the day centres. These providers will be supported by the Council, to enable them to directly support service users to access day opportunities.

This EqlA looks at the current service user profile and the borough profile and then considers the group who would be directly supported by commissioned service at Ermine Rd to access day opportunities and the individuals who would be supported by their residential home/supported living provider to access day opportunities.

Both recommendations require the reassessment or review of the needs all current service users accessing one or more of the day centres, with a view to identifying day opportnites to meet their assessed needs and designing the new service at Ermine Road. Service users will be guided on how to use their Personal Budgets and encouraged to use this to access any support required to meet assessed need. Following the reassessment or review, if, for any reason, there are service users who no longer have an eligible need, we would work closely with the service user to identify appropriate support. We will work with residential and supported living providers so that adults, in particular, those with 24 hours residential support, will be supported to directly access services in the community. A new expanded service at Ermine Road day centre would also provide significant support to adults to access day services within the community. People irrespective of where they reside, whether in residential homes or the community will have the opportunity following an assessment of need to access a range of day opportunites. This would also mitigate the impact arising from the closures.

Stage 3 – Scoping Exercise - Employee data used in this Equality Impact Assessment
Identify the main sources of the evidence, both quantitative and qualitative, that supports your analysis. This could include for example, data on the Council's workforce, equalities profile of service users, recent surveys, research, results of recent relevant consultations, Haringey Borough Profile, Haringey Joint Strategic Needs Assessment and any other sources of relevant information, local, regional or national.

Data Source (include link where published)	What does this data include?
Human Resources records (Jun/Jul 2015)	Staff profiles

Stage 4 – Scoping Exercise - Service data used in this Equality Impact Assessment
This section to be completed where there is a change to the service provided

Data Source (include link where published)	What does this data include?
EqIA Profile on Harinet (2011 Key statistics and facts sheet) http://www.haringey.gov.uk/council-and-democracy/about-council/facts-and-figures/statistics/haringey-census-statistics	Sex, Age, Ethnicity, Disability information, Race & Ethnicity, Religion/Belief, Marriage and Civil Partnership – for the Borough of Haringey
Mosaic Data on the Roundways Day Centre service users: as at 11/06/2015 Data on the Always Day Centre service users: as at 11/06/2015 Data on the Birkbeck Day Centre service users: as at 11/06/2015 Data on the Ermine Rd Day Centre service users: as at 11/06/2015	Service Users

Stage 5a – Considering the above information, what impact will this proposal have on the following groups in terms of impact on residents and service delivery:
Positive and negative impacts identified will need to form part of your action plan.

									Positive	Negative	Details	None – why?	
Sex												<p>There is no restriction by gender across the service as a whole. The service is open to anyone aged 18 years upwards provided they meet Care Act eligibility and the service can meet their assessed needs.</p> <p>The variance between service users who will continue to be directly supported by the new model at Ermine Rd and the service users that would require alternative support to access day opportunities is approximately 2% difference for both genders (see table).</p> <p>Detailed feedback to the proposal did not indicate differing impacts on service users on the grounds of their sex.</p>	
	Gender		Borough		Current LD Day Centres		Directly supported by Ermine Rd model					Alternative support	
			no.	%	no.	%	no.	%				no.	%
	Female		128702	50%	80	54%	39	56%				41	53%
	Male		126224	50%	68	46%	31	44%				37	47%
	TOTALS		254926	100%	148	100%	70	100%				78	100%
Gender Reassignment											<p>Available data does not indicate details on gender reassignment status of the service users.</p>	<p>The consultation questionnaire asked respondents for information regarding this characteristic, the pattern of responses did not differ from the general pattern.</p> <p>Detailed feedback to the proposal did not indicate differing impacts on service users on the grounds of their gender reassignment status.</p>	

Age													
					Directly supported by Ermine Rd model		Alternative support						
Age	Borough		Current LD Day Centres										
	no.	%	no.	%	no.	%	no.	%					
25-29	28062	16%	4	3%	4	6%	0	0%					
30-34	28539	17%	16	11%	13	19%	3	4%					
35-39	22684	13%	10	7%	7	10%	3	4%					
40-44	20135	12%	24	16%	10	14%	14	18%					
45-49	17656	10%	20	14%	9	13%	11	14%					
50-54	13416	8%	35	24%	14	20%	21	27%					
55-59	10613	6%	15	10%	5	7%	10	13%					
60-64	9243	5%	6	4%	3	4%	3	4%					
65-69	6680	4%	9	6%	2	3%	7	9%					
70-74	5895	3%	5	3%	2	3%	3	4%					
75-79	4506	3%	2	1%	0	0%	2	3%					
80+	5288	3%	2	1%	1	1%	1	1%					
TOTALS	172717	100%	148	100%	70	100%	78	100%					
Disability													
											Feedback from the consultation indicated that residents strongly did not support closure of these day centres and raised concerns regarding the ability of residential homes and supported living providers to meet the needs of service users. Particular concern was raised for the service users of the Roundways Day centre – adults was severe autism and the suitability of any alternative provision within the borough to met their specific needs.	Service users have varying levels of learning disability ranging from mild to complex. Some service users also have a physical disability.	

										See section 6 for the mitigation.		
Race & Ethnicity										.		<p>The services are not restricted by or to race and ethnicity. The service is open to anyone aged 18 - 64 years upwards provided they meet Care Act eligibility and the service can meet their assessed needs.</p> <p>Detailed feedback to the proposal did not indicate differing impacts on service users on the grounds of their race and ethnicity.</p>
	Borough		All current		Directly supported by Ermine Rd model		Alternative support					
Ethnicity	no.	%	no.	%	no.	%	no.	%				
Asian	24150	15%	10	7%	8	11%	2	3%				
Black	47830	29%	47	32%	26	37%	21	27%				
Mixed	16548	10%	5	3%	1	1%	4	5%				
Other	12055	7%	20	14%	14	20%	6	8%				
White	65919	40%	66	45%	21	30%	45	58%				
TOTALS	166502	100%	148	100%	70	100%	78	100%				
Sexual Orientation											Available data does not indicate details on sexual orientation status of the service users.	<p>The consultation questionnaire asked respondents for information regarding this characteristic, the pattern of responses did not differ from the general pattern.</p> <p>Detailed feedback to the proposal did not indicate differing impacts on service users on the grounds of their sexual orientation.</p>

Religion or Belief (or No Belief)												
Religion	Borough		All current		Directly supported by Ermine Rd model		Alternative support					
	no.	%	no.	%	no.	%	no.	%				
Christian	114659	45%	105	71%	46	66%	59	76%				
Hindu	4539	2%	4	3%	4	6%	0	0%				
Jewish	7643	3%	3	2%	0	0%	3	4%				
Muslim	36130	14%	17	11%	12	17%	5	6%				
None/none stated	87015	34%	17	11%	6	9%	11	14%				
Other	4132	2%	1	1%	1	1%	0	0%				
Sikh	808	0%	1	1%	1	1%	0	0%				
TOTALS	254926	100%	148	100%	70	100%	78	100%				
Pregnancy & Maternity												
											Available data does not indicate details on pregnancy and maternity status of the service users.	<p>The consultation questionnaire asked respondents for information regarding this characteristic, the pattern of responses did not differ from the general pattern.</p> <p>Detailed feedback to the proposal did not indicate differing impacts on service users on the grounds of their pregnancy and maternity status.</p>
Marriage and Civil Partnership												
											Available data does not indicate details on marriage and civil partnership of the service users.	<p>The consultation questionnaire asked respondents for information regarding this characteristic, the pattern of responses did not differ from the general pattern.</p> <p>Detailed feedback to the proposal did not indicate differing impacts on service users on the grounds of their sexual orientation, marriage and civil partnership status.</p>

Stage 5b – For your employees and considering the above information, what impact will this proposal have on the following groups: Positive and negative impacts identified will need to form part of your action plan.

									Positive	Negative	Details	None – why?
Sex											<p>This proposal involves a reduction of staff by approx 50%.</p> <p>The potentially affected roles have not yet been identified; therefore the full impact of the recommendation cannot yet be verified.</p> <p>We will embark on implementing changes using the Councils reorganisation procedure. This will involve a formal consultation process of 45 days with staff and their trade union representatives. An additionally EqIA will be completed following this consultation.</p>	<p>The workforce is equally balanced between men and women we do not consider there is risk of a disproportionate impact on this characteristic.</p> <p>There will be an opportunity for staff to raise any impacts arising for this characteristic during the consultation.</p>
Sex:	All staff	%	Birkbeck	%	Ermine Rd	%	Roundways	%				
All people	2,727		26		33		30					
Males	887	32.5%	14	54%	15	45%	17	57%				
Females	1,840	67.5%	12	46%	18	55%	13	43%				
Gender Reassignment												
Gender Reassignment												
The relevant data is not available for these groups.										<p>The potentially affected workforce is comparably older than the Council workforce. Overall there is a disproportionately higher risk of impact on staff in the 50-64 age group.</p>		
Age												
Age:	All staff		Birkbeck	%	Ermine Rd	%	Roundways	%				
Total	2,727	%	26		33		30					
16-24	34	1.2%	0	0%	0	0%	0	0%				
25-39	681	25.0%	1	4%	2	6%	11	37%				
40-49	822	30.1%	12	46%	9	27%	5	17%				
50-64	1,138	41.7%	13	50%	22	67%	14	47%				
65 +	52	1.9%	0	0%	0	0%	0	0%				

Disability										The potentially affected workforce have reported more disabilities in comparison to the Council workforce. Overall there is a disproportionately higher risk of impact on disabled staff.	
Disability:	All staff	%	Birkbeck	%	Ermine Rd	%	Roundways	%			
All people	2,727		26		33		30				
Disabled Staff	282	10.3%	9	35%	9	27%	2	7%			
Non Disabled Staff	1,775	65.1%	11	42%	19	58%	26	87%			
Not Declared	670	24.6%	6	23%	5	15%	2	7%			
Race & Ethnicity										The potentially affected workforce contains comparably more staff from BME backgrounds (66.3%) compared to the council generally (53.1%). Overall there is a risk disproportionately higher impact on staff from BME background.	
Race & Ethnicity:	All staff	%	Birkbeck	%	Ermine Rd	%	Roundways	%			
All people	2,727		26		33		30				
White	1,219	44.7%	8	31%	12	36%	7	23%			
Mixed	100	3.7%	0	0%	2	6%	2	7%			
Asian	263	9.6%	4	15%	3	9%	1	3%			
Black	1,009	37.0%	14	54%	14	42%	19	63%			
Not Declared	59	2.2%	0	0%	0	0%	0	0%			
Other ethnic group	77	2.8%	0	0%	2	6%	1	3%			

Sexual Orientation													There is insufficient data to allow an analysis of the impact of the recommendations on staff in consideration of their sexual orientation status. There will be an opportunity for staff to raise any impacts arising for this characteristic during the consultation.
Sexual Orientation:	All staff	%	Birkbeck	%	Ermine Rd	%	Roundways	%					
	2,727		26		33		30						
Bi-Sexual	8		0	0%	0	0%	1	3%					
Gay Man	12		0	0%	0	0%	0	0%					
Hetrosexual	528		5	19%	3	9%	4	13%					
Lesbian	4		0	0%	0	0%	0	0%					
Prefer not to say	188		0	0%	0	0%	1	3%					
Not Declared	1,987		21	81%	30	91%	24	80%					
Religion or Belief (or No Belief)													There is insufficient data to allow an analysis of the impact of the recommendations on staff in consideration of their religion or beliefs. There will be an opportunity for staff to raise any impacts arising for this characteristic during the consultation.
Religion or Belief (or No Belief):	All staff	%	Birkbeck	%	Ermine Rd	%	Roundways	%					
All people	2,727		26		33		30						
Christian	335	12.3%	5	19%	2	6%	5	17%					
Buddhist	2	0.1%	0	0%	0	0%	0	0%					
Hindu	16	0.6%	0	0%	0	0%	0	0%					
Jewish	5	0.2%	0	0%	0	0%	0	0%					
Muslin	52	1.9%	0	0%	0	0%	0	0%					
Sikh	7	0.3%	0	0%	0	0%	0	0%					
Other Religion	16	0.6%	0	0%	0	0%	0	0%					

No Religion	152	5.6%	0	0%	1	3%	0	0%
Not Stated	2,142	78.5%	21	81%	30	91%	25	83%
Pregnancy & Maternity								
Pregnancy & Maternity								
The relevant data is not available for these groups.								
Marriage and Civil Partnership (note this only applies in relation to eliminating unlawful discrimination (limb 1))								
Marriage and Civil Partnership:	All staff	%	Birkbeck	%	Ermine Rd	%	Roundways	%
All people over 16 years old	2,727		26		33		30	
Single	550	20.2%	0	0%	1	3%	0	0%
Married	253	9.3%	2	8%	4	12%	4	13%
Separated	2	0.1%	0	0%	0	0%	0	0%
Divorced	24	0.9%	0	0%	0	0%	0	0%
Widowed	2	0.1%	0	0%	0	0%	0	0%
Same-sex civil partnership	0	0.0%	0	0%	0	0%	0	0%
Not Stated	1,896	0%	24	92%	28	85%	26	87%

Stage 6 - Initial Impact analysis	Actions to mitigate, advance equality or fill gaps in information
<p>(This initial analysis was completed in June 2015 – before the consultation process.)</p> <p>Inherent risks:</p> <p>In house services are highly valued by people who use services, their families and carers. However, with reduced public funding, Local Authorities need to develop new models and approaches which increase value for money.</p> <p>The closure of the three day centres and move towards community-based services will result in changes in care provided for some existing customers. There is an inherent risk that the loss of the centres will lead to the loss of day activities for some users if they are not supported to find alternative day activities in the community. Actions will be taken to mitigate this inherent risk (see opposite column).</p> <p>There is also a risk of anxiety amongst existing service users during the changes, resulting in comment and complaints from customers and from their families. Actions will be taken to mitigate this inherent risk (see opposite column).</p> <p>There is a risk that the loss of day opportunities may result in isolation and have negative health and social care implications on an individual. However we have a number of mitigating actions to ensure this does not occur (see opposite column).</p> <p>Risks identified through equalities impact assessment:</p> <p>The only potential risk identified through the assessment of the impact on the protected characteristics is that a significant number of service users aged between 40-59 that will no longer receive support directly provided by the Council. This will be taken into account when the needs of these service users are assessed and appropriate community-based support sought for them.</p> <p>There would be a reduction in the number of staff directly employed by the council and a separate EqIA will be carried out into the equality impact of this change.</p>	<p>(This initial analysis was completed in June 2015 – before the consultation process.)</p> <p>The new model aims to maximise the resource that we have for service delivery and target the available resources based on 1) providing equity for all service users, 2) preventing and delaying the need for long term care.</p> <p>Service users and staff will be engaged as part of the consultation. Their views will be fed into the full Equalities Impact Assessment, which will return to Cabinet following the consultation period. This will include more detailed analysis of the impact of closing the three day centres and delivering services at Ermine Road Day Centre from an alternative model and more detailed mitigating actions</p> <p>To mitigate the effects of the proposals we will:</p> <ol style="list-style-type: none"> 1. Review/ reassess the needs of the centres' current service users, with a view to identifying satisfactory alternative provision to meet assessed needs. 2. Work with service users to co-design the new model for day opportunities for adults with a learning disability. 3. Expand provision at Ermine Road to provide support for those with assessed needs from Roundways, Birkbeck Road and Always day centres. 4. Work with residential and supported living providers so that adults, in particular, those with 24 hours residential support, will be supported to directly access alternative services in the community. Service users will be supported to identify appropriate support. 5. Work with the community and identify alternative options for day opportunities, to develop more choice for service users. 6. Encourage the use of Personal Budgets amongst service users to access any support required to meet assessed need. Council commissioned support and information and advice services will help service users make the most of their Personal Budget.

--	--

Stage 7 - Consultation and follow up data from actions set above

Data Source (include link where published)	What does this data include?
<p>Consultations on the three proposals were undertaken from 1 July to 1 October 2015.</p> <p>An independent advocacy provider (LDX) was available for individuals during the public consultation meetings to help people to express their wishes and feelings, support them in weighing up their options and assist them in making their own decisions regarding the proposed changes to services.</p>	<p>230 people responded to Proposal 3 - 89% of responses 'strongly did not support' the proposals to close Roundaways, Birkbeck Road and Always day centres and 72% of responses 'strongly did not support' our proposal to provide a new model of day opportunities from Ermine Road Day Centre through an alternative provider.</p> <p>There were three overarching themes in the responses opposing the proposal to close Roundaways, Birkbeck Road and Always day centres:</p> <ol style="list-style-type: none"> 1) Loss of the high quality of services currently provided by the centres 2) Fear for service users safety and social interaction 3) Need for respite for family/carers <p>Responses to the proposal 'to provide a new model of day opportunities from Ermine Road Day Centre through an alternative provider' noted the need for further knowledge of 1) the potential alternative provider to determine whether or not they could support the proposal and 2) the adjustments that could be made to Ermine Road Day centre to make the facility suitable to a wider range of needs.</p>

Stage 8 - Final impact analysis

The consultation feedback indicated service users were concerned about:

- (i) the loss of a very high quality service with skilled, experienced staff and the risk of it being replaced with less high quality services with less skilled and experienced staff;
- (ii) the lack of any alternatives (iii) increased safeguarding risks as a result of moving away from the highly safe, trusted and proven environment at Roundways; (iv) the loss of respite care during the day, which Roundways afforded; (v) the autistic service users' need for stability and continuity and the difficulty of their dealing with change.

The consultation feedback has highlighted risks and concerns for affected service users and the families/carers; these have been explored within section 5 and 6 above.

The concern of a lack of alternative provision is mitigated by evidence that there is a mature community sector in Haringey that already meets the needs of adults with learning disabilities. For the last 3 years no adult has been referred to receive day opportunities from a day centre within the borough, instead they have received day opportunities within the community.

To further mitigate the effects of the proposals we will:

1. Ensure that the new expanded provision at Ermine Road will include specialist provision for people with learning disabilities and with complex needs and is compliant with the Statutory Guidance for Local Authorities and NHS organisations to support the implementation of the Adult Autism Strategy 2015, a copy of which is attached as Appendix 16 and in particular, with regard to the following;
 - i) Ensuring suitably trained staff providing direct support to people with autism including support with managing change and complex behaviours;
 - ii) Local planning and leadership in relation to the provision of services for adults with autism;
 - iii) Preventative support and safeguarding measures in line with the requirements of the Care Act 2014; and
 - iv) Making reasonable adjustments which can include changes to: premises; processes; face-to-face communications; written communications; planning and preparation – offering opportunities for adults with autism to visit settings in advance to familiarise themselves with what to expect; and to access mainstream services.

In addition we will:

2. Engage with carers/families as early as possible and before the implementation of any changes to reduce anxiety.
3. Review/ reassess the needs of the centres' current service users, with a view to identifying satisfactory alternative provision to meet assessed needs.
4. Work with service users and their families/carers to co-design the new model for day opportunities for adults with a learning disability.
5. Design/adjust the provision at Ermine Road to provide support to a wider range of learning disabilities (including any necessary adjustments to the building facilities to address the assessed needs of individuals).
6. Work with residential and supported living providers so that adults, can be supported to directly access alternative services in the community.
7. Work with the community to identify and develop alternative options for day opportunities.
8. Encourage the use of Personal Budgets amongst service users to access support required to meet assessed needs. - Council commissioned support and information and advice services will help service users make the most of their Personal Budget.
9. Work with the community to identify and develop ways to make information around the availability of opportunities in the community and the appropriateness of these easily accessible and available.
10. Enable greater access to activities for individuals with learning disabilities and also encourage more specific physical activities opportunities for individuals where necessary.
11. Ensure there are enough opportunities available that are of a longer duration to provide carers with the opportunity for respite.

In terms of monitoring:

- 1) Officers will (i) carefully monitor the development of these proposals; (ii) continue to have “due regard” to the Public Sector Equalities Duties during the implementation process;
- 2) There will be monitoring and oversight of the implementation of the recommendations through i) the Strategic Healthy Lives Priority Board (which has oversight of the strategic and operational delivery of the various service proposals), ii) Transformation Group (which provides scrutiny and challenge to the

delivery of the Transformation proposals/plans and ongoing monitoring of quality and performance), iii) the Director and Lead member for Health and Wellbeing. In addition the transformation is subject to scrutiny by the Council's overview and Scrutiny Committee and the Adults and Health Scrutiny panel.

Note: A reduction in staff of approximately 50% is anticipated for this service area – consultation will be undertaken with staff. Should the recommendations be agreed further equalities analysis for the impact on staff will be carried out via an additional EQIA.

Stage 9 - Equality Impact Assessment Review Log

Review approved by Director / Assistant Director

Date of review

Review approved by Director / Assistant Director

Date of review

Stage 10 – Publication

Ensure the completed EqIA is published in accordance with the Council's policy.