

## EQUALITY IMPACT ASSESSMENT AND ANALYSIS (EqIAA) FORM

<b>Name of Function under consideration:</b>	Review of current procurement arrangements for redevelopment of Newton House/The Heath, Cadbury Heath
<b>Is this Function 'Major', 'Minor yet likely to have a major impact' or 'Neither'</b>	Neither
<b>Date(s) of completing the EqIAA:</b>	April 2016
<b>Name and job title(s) of person(s) completing the EqIAA:</b>	Enabling Programme Manager

### SECTION 1 – INTRODUCTORY INFORMATION

<p><b>1. What is the main purpose of the Function?</b></p> <p>To decide on whether to continue with current procurement for redevelopment of the Council owned site at Newton House/The Heath, Cadbury Heath for ExtraCare Housing scheme or to review for other forms of specialist older person housing and/or retender.</p>
<p><b>2. List the main activities of the Function:</b></p> <p>To deliver a new scheme for older people to meet priority housing and social care needs on Council owned land.</p>
<p><b>3. Who are the main beneficiaries of the Function?</b></p> <p>Residents of South Gloucestershire in need of specialist older persons housing with assessed care and support needs.</p>
<p><b>4. How is the overall success of the Function measured?</b></p> <p>Delivery of a good quality specialist housing scheme for older people. A higher quality of life for older people in the community.</p> <p>Care provision is monitored through care management reviews with older people and their carers.</p> <p>Feedback from service users.</p> <p>Complements / complaints</p>
<p><b>5. What equality monitoring systems are in place to carry out regular checks on the effects of the Function on equality groups?</b></p> <p>Care management's assessment of an individual's needs, and a person-centred care planning approach should ensure that their equalities needs are covered in any setting (assuming that any are identified – have to recognise and respect that people often do not want to notify their membership of different equalities groups and so numbers are often under-reported).</p> <p>Equalities information is gathered from service users.</p> <p>Provider monitoring. Note that the service specification in care commissioning includes requirements from the provider such as:</p> <ul style="list-style-type: none"> <li>- Service Users have equal access to services without hindrance from discrimination or prejudice, they are protected from any discrimination, harassment or social exclusion</li> <li>- Compliance with equalities legislation</li> <li>- The need for a service users social, emotional, religious, cultural, political, sexual</li> </ul>

needs and any other needs to be understood and met, and details of how the support will be provided is normally expected to be covered by the provider's support delivery plan

- Accessibility of information (different formats etc)
- Equalities policies and procedures to be in place and for workforce policies to include equal opportunities, anti-discriminatory practice and harassment. Equality and diversity training for staff would also be included.
- A process which listens to feedback from service users and services developed accordingly.

If a scheme has nominations through HomeChoice: Equalities information is gathered from all applicants to HomeChoice and reports on those bidding on properties and successful applicants are reviewed as part of the ongoing HomeChoice equalities analysis.

If a scheme is provided by housing association partner then this organisation will carry out equalities monitoring of its customers.

**6. What are your equality related performance indicators/measure of success for this Function?**

Equality information is incorporated into reports on numbers of service users.

There are no specific equality-related PIs for this function, however measures of success are parity of satisfaction amongst customer groups; parity of access to opportunities across customer groups.

## SECTION 2 – INITIAL ASSESSMENT OF IMPACT

Equality Group	Negative Impact	Positive Impact	No Impact	Unsure of Impact	Reason(s)
Women/Girls	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	See text and table below
Men/Boys	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Lesbians, gay men & bisexuals	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Transgender people	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
White people (including Irish people)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Asian or Asian British people	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Black or Black British people	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
People of mixed heritage	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Chinese people	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Travellers (gypsy/Roma/Irish heritage)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
People from other ethnic groups	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Physical impairment, e.g. mobility issues which mean using a wheelchair or crutches.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Sensory impairment, e.g. blind/having a serious visual impairment, deaf/having a serious hearing impairment.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Mental health condition, e.g. depression or schizophrenia.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Learning disability/difficulty, e.g. Down's syndrome or dyslexia, or cognitive impairment such as autistic spectrum disorder.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Long-standing illness or health condition, e.g. cancer, HIV, diabetes, chronic heart disease or epilepsy.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Other health problems or impairments.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Older People	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Children and Young People	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Faith Groups	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Pregnancy & Maternity	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Marriage & Civil Partnership	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

The South Gloucestershire Housing Strategy 2013-18 vision is that everyone should be able to live in a good quality home that meets their needs and that they can afford.

One of the priority themes in the South Gloucestershire Joint Health and Wellbeing Strategy 2013/16 is to enable older people to live healthy, active and independent lives for as long as possible. A marked improvement of choice and integrated working in a designated Priority Neighbourhood will be enabled.

Evidence of need and demand and any gaps in service provision for older people requiring specialist housing and care are set out within the JSNA and the Council’s Market Position Statement.

The Older Persons Accommodations Strategy sets out to identify 700 new mixed tenure ExtraCare homes for older people so that a range of homes for older people is available to rent and buy in sustainable locations across South Glos.

New housing for older people will be designed to new development and technology standards, taking into account specialised requirements.

New specialised housing for older people will mean older people are housed more appropriately and suitably resulting in a positive impact for most equality groups. Existing housing released by the moves would be available to other households in need of housing. Therefore there is a positive impact for wider equality groups too, for example children and young people living in households in need of housing.

Redeveloping Council owned land for older peoples specialised housing ensures the Councils resources are used to meet priority needs of its residents. The issues and risks with the current procurement situation means that consideration of the provision of a care home instead of ExtraCare housing is an opportunity to provide specialised housing for older people without prejudicing provision of ExtraCare across the District; an alternative priority need and a gap in service provision would be met by either form of accommodation.

The preferred option will benefit the groups of residents in need of specialist older persons accommodation with higher care needs (as evidence by the JSNA and Market Position Statement) at less risk and potentially within a quicker timescale than continuing with the current procurement option.

It is anticipated that the above will result in a positive impact for all. Table below explores specific areas:

	<b>Principle</b>	<b>Advantages</b>	<b>Other comments</b>
<b>1</b>	To enable the Council to meet priority need	Delivery of specialist older peoples’ accommodation closes a gap in service provision as detailed in JSNA and Market Position Statement.	Exploring an alternative form of older peoples accommodation whilst awaiting the Governments review of LHA aims to minimise delays of provision to those in need of care.
<b>2</b>	to enable the Council to make best use of assets	Will deliver additional specialised older persons’ housing, allows reuse of existing homes and redevelops site surplus to requirements.	Demonstrates good consideration of gaps in service and levels of need and demand for older people services. Demonstrates good asset management
<b>3</b>	to enable specialist older persons’ accommodation in South Gloucestershire	If proceed with ExtraCare that additional new specialised affordable housing for rent is delivered, which will contribute towards meeting the Council’s priority need.  If proceeds for care home then additional new specialised older persons’ accommodation could	HCA funding is to be directed towards low cost home ownership and there is significantly reduced levels of capital grant funding available to provide specialist older persons’ accommodation for rent. Land sold to RP at nil consideration to maximise provision.  No capital grant funding would be expected to be needed. Land sold on open market.

		be delivered which will contribute towards meeting the Council's priority need.	
4	that the subsidy does not replace any other subsidy (i.e. any opportunity for Homes and Communities Agency (or other) funding is exhausted first)	The new specialised housing scheme delivered will be genuinely additional	For ECH a capital funding bid would be made to subsidise scheme, plus provision of subsidy via land transfer arrangements to assist. Using opportunity to market for care home does not require capital subsidy.
5	Any proposal is subject to specific Council approval	The Council will have the opportunity to direct the use of its land towards specific Council priorities.	
6	That any projects are value for money	The quantum of specialised older persons' housing that can be delivered from any funding required is maximised to meet priority needs.	Proposals to deliver the specialised homes would lever in private finance from a partner and/or public grant funding.
7	That any new scheme is completed within a reasonable timescale	It will benefit SGC for the specialised housing to be available for residents in need as quickly as possible.	Specialised funding is currently available for bids. Current procurement needs to be resolved. Council land is not currently being used as effectively as it could be.
8	That any scheme would be occupied by those meeting specific entry/eligibility criteria	Eligibility criteria have been considered in separate policy decisions	
9	That any older person resident in the scheme would have a person-centred care planning approach	Care management's assessment of an individual's needs, and a person-centred care planning approach should ensure that their equalities needs are covered in any setting (assuming that any are identified).	Further analysis could be undertaken of numbers of people in different equalities groups who are supported by ECH's or in care homes in SG however have to recognise and respect that people often do not want to notify their membership of different equalities groups and so numbers are often under-reported

**8. If you have indicated that there is a negative impact on any group, is that impact:**

**Legal?** Yes  No

**Intended?** Yes  No

**Level of impact** High  Low

**No negative impact has been identified:**

**9. Could you minimise or remove any negative impact - how?**  
N/A

**10. Could you improve a positive impact of the Function - how?**  
Ensuring that the services provided within the older peoples' accommodation enable the residents/service users to live as independently as possible and maintain health and wellbeing. In particular significant positive impacts can be made with those suffering from isolation and those who feel marginalised.

Effective promotion of the accommodation and services would ensure all residents meeting eligibility criteria would be able to choose the accommodation/services.

Through monitoring of services provided by/with the accommodation the expectations and choices of older people can be enabled.

**11. If there is no evidence that the Function promotes equality of opportunity or improved relations, could it be adapted so that it does - how?**  
N/A

**12. Any other relevant notes:**  
N/A

## **SECTION 3 – CONSULTATION & RESEARCH IN RELATION TO THE EqIAA**

### **13. What consultation has been conducted with groups and individuals from groups likely to be affected as well as staff, and what evidence has this provided about equalities impact?**

Data on housing and care needs of older people was collected as part of the South Gloucestershire JSNA in 2015. The Executive Summary can be found here: <https://council.southglos.gov.uk/documents/s66999/JSNA%20-%20Exec%20summary.pdf> Equalities considerations and monitoring is an integrated part of the Joint Strategic Needs Assessment process. Each of the 40 chapters, including housing, has an equalities section containing a review of equalities issues and identifies customer consultation.

Individual strategies listed within this document and associated decision reporting will identify their specific consultation and equalities impact assessments.

The decision proposed is in line with strategies and needs assessments and only positive impacts have been identified.

### **14. What relevant research (data, reports, expert opinion etc.) has been conducted and what evidence has this provided about equalities impact?**

The Draft Housing and Planning Bill published by Government in early October proposes significant changes to the delivery of affordable housing, and an ambitious target has been set to deliver one million new homes by 2021.

So far, however, the policy changes introduced in advance of the Bill have had an adverse effect on delivery and neither the top or second place bidder to provide the ExtraCare scheme proposed for this site have been able to stand by their original bid. Furthermore, the uncertainty of Government announcements regarding the LHA means a scheme will only be able to proceed at risk until Government clarifies its intention.

In addition the availability of capital grant to fund new specialist homes for older people, specifically affordable rented, has reduced significantly.

Welfare reform will have a material impact on housing associations, their customers and local authorities. The combined effect of welfare reform and the other policy changes is expected to be an increase in homelessness and in the use and cost of temporary accommodation.

The JSNA has been recently completed and the needs and gap in service provision identified there, and in the Council's Market Position Statement, identify priorities for the delivery of specialist older peoples' accommodation, for care homes and for ExtraCare housing.

It is therefore important to identify the changes following the commissioning decision which has already been made by Members and to seek approval whether to proceed with current procurement arrangements or proceed with alternative arrangements with the aim of delivering a scheme of accommodation for older people with care and support needs.

Overall, it is anticipated that there will be a positive impact for all in relation to this proposal as indicated in Section 2 of this EqIAA.

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The Market Position Statement contains more specific data and information on need and demand in supporting adults to live independently and contains specific sections on old age, dementia, specialised housing for older people and residential and nursing care.

HomeChoice is currently upgrading the re-housing system and is in the process of transferring applicants from the old system to the new. As a result, the below information, collated in June 2014, provides an indication of HomeChoice data.

### **Total Population**

The population estimate for South Gloucestershire (taken from the 2011 national census) was 262,800.

### **HomeChoice**

The number on HomeChoice on 01.01.14 was 6,528.

### **Ethnicity**

The table below compares the ethnic background of the population of South Gloucestershire in the 2011 census with applicants on HomeChoice on 01.01.14:

Group	District		HomeChoice	
	Number	% of Population	Number	% of HomeChoice Population
Asian/Asian British – Bangladeshi	238	0.1%	#	0.1%
Asian/Asian British – Indian	2,699	1%	10	0.2%
Asian/Asian British – Pakistani	698	0.3%	18	0.3%
Asian/Asian British – Chinese	1,312	0.5%	#	0.1%
Asian/Asian British – Other	1,493	0.6%	41	0.6%
Black/African/Caribbean/Black British – African	987	0.4%	86	1.3%
Black/African/Caribbean/Black British – Caribbean	980	0.4%	78	1.2%
Black/African/Caribbean/Black British – Other	251	0.1%	27	0.4%
Mixed/Multiple Ethnic Groups – White & Asian	1,016	0.4%	20	0.3%
Mixed/Multiple Ethnic Groups – White &	396	0.2%	15	0.2%

Black African				
Mixed/Multiple Ethnic Groups – White & Black Caribbean	1,516	0.6%	100	1.5%
Mixed/Multiple Ethnic Groups – Other	739	0.3%	13	0.2%
White – English/Welsh/Scottish/Northern Irish/British	241,611	91.9%	4995	76.5%
White – Irish	1,223	0.5%	30	0.5%
White - Gypsy or Irish Traveller	271	0.1%	28	0.4%
White – Other	6,469	2.5%	204	3.1%
Other Ethnic Group - Arab	366	0.1%	0	0%
Any Other ethnic group	502	0.2%	31	0.5%
Declined to answer	---	---	822	12.6%

### **Religion or Belief**

This table compares the religion/belief of residents responding to the 2011 census with applicants on HomeChoice on 01.01.14:

<b>Religion/Belief</b>	<b>District</b>		<b>HomeChoice</b>	
	<b>Number</b>	<b>% of Population</b>	<b>Number</b>	<b>% of HC Population</b>
Christian	156,504	59.6%	1974	30.2%
Buddhist	708	0.3%	16	0.3%
Hindu	1,681	0.6%	#	0.1%
Jewish	145	0.1%	0	0%
Muslim	2,176	0.8%	69	1%
Sikh	623	0.2%	#	0.1%
Other religion	888	0.3%	86	1.3%
No religion	80,607	30.7%	2165	33.2%
Religion not stated	19,435	7.4%	2207	33.8%

### **Age**

This table compares the age of residents responding to the 2011 census with applicants on HomeChoice on 01.01.14:

<b>Age Range (Years)</b>	<b>South Gloucestershire</b>	<b>Age Range (Years)</b>	<b>HomeChoice</b>
Age 0 to 4	6.1%	16-24	15.9%
Age 5 to 9	5.6%		
Age 10 to 14	6.1%	25-34	30.9%
Age 15 to 19	6.7%		
Age 20 to 24	5.9%	35-44	19.9%
Age 25 to 29	5.9%		
Age 30 to 34	6.1%	45-54	13.8%
Age 35 to 39	6.6%		
Age 40 to 44	7.9%	55-64	8.3%
Age 45 to 49	8.1%		
Age 50 to 54	6.6%	65+	11.2%
Age 55 to 59	5.7%		

Age 60 to 64	6.0%
Age 65 to 69	5.1%
Age 70 to 74	4.0%
Age 75 to 79	3.3%
Age 80 to 84	2.3%
Age 85 and over	2.1%

### **Sexual Orientation and Gender Identity in South Gloucestershire**

There is no hard data on the number of lesbians, gay men, bisexuals and transgendered people in the UK. However, the Government is using the figure of 5-7% of the population and Stonewall<sup>1</sup> agree that this is a reasonable estimate. 2% of applicants fall within this category on HomeChoice. Whilst this is clearly lower than the Government estimate, it should be noted that 30% of applicants on HomeChoice chose not to answer this question.

Overall, it is anticipated that there will be a positive impact for all in relation to this proposal as indicated in Section 2 of this EqIAA, however it is particularly worthwhile noting that those groups where a higher proportion of residents are part of HomeChoice than is the proportion in the South Gloucestershire population, have the potential for positive impact to be realised:-

- Black/African/Caribbean/Black British – African
- Black/African/Caribbean/Black British – Caribbean
- Black/African/Caribbean/Black British – Other
- Mixed/Multiple Ethnic Groups – White & Black Caribbean
- White - Gypsy or Irish Traveller
- Any Other ethnic group
- Those aged 16 – 34 years

### **15. What contributions does your function/activity make towards promoting community cohesion?**

Specialised housing for older people, including affordable homes for rent, contributes towards establishing mixed, balanced and sustainable communities and therefore have a positive impact on community cohesion.

Choice of housing for older people in need of specialist housing and services will be widened by the provision of new accommodation, built to higher development and technological standards, which take into account specialised requirements.

The Council is committed to ensuring residential care is provided where this is the most suitable option, particularly where there is a need for specialist support, and strives to build a culture that encourages community engagement to deliver services effectively and provide a range of options which enables people to remain living as independently as possible. Services are designed to maximise inclusion.

<sup>1</sup> For further information, visit: <http://www.stonewall.org.uk/>

## SECTION 4 – OUTCOMES

Outcome	Your response	Reason(s) and Justification
<p><b>Outcome 1:</b> No major change required.</p>	<input checked="" type="checkbox"/>	<p>Additional specialised older persons' housing will become available in South Gloucestershire, thus meeting a clearly identified need, as highlighted in the Council's Market Position Statement and through the JSNA.</p> <p>There is a gap in service provision for specialised older peoples' accommodation and the current situation gives an opportunity to consider an alternative form for provision for those with a higher or more specialist care need without prejudicing wider provision of ExtraCare housing.</p> <p>Occupancy and eligibility criteria for either form of specialised older peoples' accommodation has already been considered in separate equalities impact assessments.</p> <p>The risks associated with proceeding with options are explored in the decision report. The principles and advantages of the recommendations are explored in Section 2.</p>
<p><b>Outcome 2:</b> Adjustments to remove barriers or to better promote equality have been identified.</p>	<input type="checkbox"/>	
<p><b>Outcome 3:</b> Continue despite having identified potential for adverse impact or missed opportunities to promote equality.</p>	<input type="checkbox"/>	
<p><b>Outcome 4:</b> Stop and rethink.</p>	<input type="checkbox"/>	

**16. List the actions you will take as a result of this EqIAA.**

With regard to any future Council nominations to affordable homes HomeChoice conduct monitoring on an on-going basis, which will allow us to identify and address any equalities issues that may emerge. This will include monitoring of:

- Number of applications received.
- Number of applications registered within 10 working days.
- Number of applicants not accepted onto the Housing Register.
- Number of properties advertised by type, area and landlord.
- Number of bids and method of bidding.
- Number of bids for each property by band.
- Profile of bids, i.e. by age of applicant, ethnicity, transfer, homelessness.
- Number of accepted offers by band.
- Number of offers refused.
- Number of properties advertised more than once (hard to let).
- Number of review requests.
- Number of complaints.

The Council will monitor compliance via an annual disclosure statement which will be taken to the Adults, Housing and Public Health Committee.

Equality information is incorporated into reports on numbers of service users and eligibility.

Care management's assessment of an individual's needs, and a person-centred care planning approach should ensure that their equalities needs are covered in any setting (assuming that any are identified).

Measures of success are parity of satisfaction amongst customer groups; parity of access to opportunities across customer groups.

**SECTION 5 – EqIAA EVIDENCE**

**17. List the evidence you have which shows how you have systematically considered equality impact.**

JSNA

Market Position Statement

ExtraCare Design Brief

Care and support service specifications

Relevant Strategies and action planning

Previous decision making reports

Procurement processes and submissions

Draft Housing and Planning Bill and welfare reform legislation

HCA SOAHP 2016-21 prospectus

Meeting outcomes and notes from bidders

Consultation with partners and providers

Feedback from service users

Minutes of provider/service user reviews and meetings