



Section 4

Equality Analysis Toolkit

**Modernisation of Provision of Supported
Housing**

For Decision Making Items

Question 1 - What is the nature of and are the key components of the proposal being presented?

"Supported housing is defined as any scheme where housing, support and sometimes care services are provided with the purpose of enabling the person receiving the support to live as independently as possible in the community" Making it Real for Supported Housing", Think Local Act Personal, Sitra (June2016)

There are over 1500 Adults receiving care and support in over 700 supported housing settings predominately in shared households. This service area represents a significant proportion of the council's expenditure – the current annual spend on supported housing is £73m.

This proposal is intended to

1. Modernise the offer of supported housing for all client groups. Most accommodation is currently in the form of shared housing but there is a need for more flat scheme accommodation which offer greater independence.
2. Decommission some 1, 2 and 3 person properties. Some shared housing is now not fit for purpose and/or offers poor value for money. This presents opportunities for individuals to move to newer flat scheme accommodation.
3. Reshape services, particularly with regard to night time support which traditionally has been provided by either a staff sleep in service or a staff waking watch service. New technology together with more creative ways of delivering this support are now possible.
4. Achieve significant savings and better value for money through a more efficient model and establish a sustainable offer of supported housing with care and support for the future

Question 2 - Scope of the Proposal

Is the proposal likely to affect people across the county in a similar way or are specific areas likely to be affected – e.g. are a set number of branches/sites to be affected?

This is a countywide issue which affects all districts. There is a lack of flat scheme accommodation in all districts and consequently high demand from existing schemes.

Similarly, reshaping how the Council can change the support is provided for some properties, including night support will happen on a countywide basis.

Question 3 – Protected Characteristics Potentially Affected

Could the proposal have a particular impact on any group of individuals sharing protected characteristics under the Equality Act 2010, namely:

- Age
- Disability including Deaf people
- Gender reassignment
- Pregnancy and maternity
- Race/ethnicity/nationality
- Religion or belief
- Sex/gender
- Sexual orientation
- Marriage or Civil Partnership Status

And what information is available about these groups in the County's population or as service users/customers?

Based on information from the current LCC Supported Living Database, the following table shows the potential impacts on different population groups by percentage:

Group	Percentage of total cohort
Age – 65 years +	16%;
Age – 55 years +	35%
Disability	100%
Race/ethnicity/nationality - all minority groups	0.05%.
Race/ethnicity/nationality White British	99.95%
Sex/gender – men	62%
Sex/gender – women	38%

There are disproportionately more White people receiving the service than the County's population overall where they account for 92% of the population. Males are also over represented at 62% than the county's population overall compared to 49% of the Lancashire population according to the 2011 census.

Over 90% of the 1500 people currently receiving a supported housing service have a learning disability with the remainder having a mental illness or physical disability. This is in comparison with information from the Projecting Adult Needs

and Service Information (PANSI) which estimated a total figure of 22,275 people to have a learning disability in Lancashire.

The Learning Disability/Autism specific joint strategic needs assessment carried out in 2012, revealed that in Lancashire :

- Nearly half of people experiencing a learning disability live in the most deprived areas of Lancashire.
- People with learning disabilities are much less likely to be in paid employment.
- Housing needs of people with learning disabilities are considerable and will increase.
- People with learning disabilities experience much poorer health outcomes across a range of conditions.

This project is intended to specifically address these issues by the provision of good quality accommodation, and providing support which is aimed at maximising independence, including encouraging people with a learning disability into employment.

The following groups of people will be prioritised for flat scheme accommodation and support :

- a) Individuals currently supported in unsuitable or high cost single tenancies
- b) Individuals currently supported in 2/3 person tenancies where there are higher support costs (compared to flat schemes) and/or compatibility issues between service users.
- c) Individuals in under occupied properties to reduce the replacement of housing benefit revenues due to vacancies and support void costs. Making use of the under occupancy policy
- d) Individuals currently supported in residential care who may want to return to Lancashire if placed out of County or may be unaware of alternative models of support available
- e) People with urgent risks & safeguarding issues
- f) New demand e.g. young people transitioning from Children's Services

Question 4 – Engagement/Consultation

How have people/groups been involved in or engaged with in developing this proposal?

Consultation will be required with :

- Current care providers
- Housing providers/developers
- District Councils
- LD Partnership Boards
- LD Forums
- MH Forums
- Service users and families/carers
- Clinical Commissioning Groups
- Internally with LCC staff

Commissioners have already started to raise awareness of these proposals with care and support providers and CCG representatives and a Communication Plan will be developed for all stakeholders

Question 5 – Analysing Impact

Could this proposal potentially disadvantage particular groups sharing protected characteristics and if so which groups and in what way? This pays particular attention to the general aims of the Public Sector Equality Duty:

- To eliminate unlawful discrimination, harassment or victimisation because of protected characteristics;
- To advance equality of opportunity for those who share protected characteristics;
- To encourage people who share a relevant protected characteristic to participate in public life;
- To contribute to fostering good relations between those who share a relevant protected characteristic and those who do not/community cohesion;

These proposals affect the current supported housing service which includes people with a learning disability and/or autism, people with a mental health issue and people with a physical disability

An objective of the proposal is to advance equality of opportunity for service users within supported housing schemes in many ways such as

- Increased access to community facilities
- Improved life chances and health outcomes
- Improved access to employment

A key aim for all new flat schemes is for them to be outward facing and become part of the community and community life, therefore fostering social integration and facilitating access to the local community and its resources.

Considerable consultation is done at the outset of all developments to promote neighbourhood awareness and prevent instances of hate crime.

A key aspect of this proposal is to reduce the number of 1,2 and 3 person tenancies as they are often relatively expensive and consequently offer poor value for money as many have vacancies for which the Council is paying a rental void payment. Around 85% of properties used for supported housing are for 1, 2 and 3 person tenancies

Number of People in Property (Capacity)	Number of Properties
1	343
2	130
3	125

Local Authorities are entitled to offer suitable alternative accommodation to any tenant who is living in a supported living tenancy which is not financially viable or no longer meets their needs. There are a number of factors that influence whether a tenancy is non-viable. A non-viable tenancy may be one where the environment no longer meets the tenant(s)' needs; or where cost pressures make the scheme financially unviable; or there are insurmountable incompatibility issues between service users; or any other impacts.

This therefore has the potential to disadvantage some service users within any of the identified client groups who are living in non-viable tenancies but who do not wish to move. However, the decision by the Council that a scheme is 'non-viable'

would only be made having considered all circumstances, working closely with the Housing Provider, Care Provider, service user and family / advocate.

Note that these proposals are subject to consultation with stakeholders as listed in Question 4. As a result of the consultation, aspects of this proposal (and this answer) may need to be revised.

Question 6 –Combined/Cumulative Effect

Could the effects of this proposal combine with other factors or decisions taken at local or national level to exacerbate the impact on any groups?

There are major proposals for changes across the County Council over the next few years due to economic reasons and the requirement to reduce the current level of spend. It is therefore difficult to foresee all potential implications.

However, this specific proposal to modernise the provision of supported housing is in line with the draft Housing with Care and Support Strategy 2018 – 2015, which was approved by Cabinet on 13th September 2018. This document sets out the Council's ambition is to work with our key partners to develop a range of high quality Housing with Care and Support schemes across Lancashire by 2025 for both older adults and younger adults with disabilities. However, the strategy is now subject to a process of consultation with wider stakeholders and therefore the outcome of this consultation may impact on these proposals.

Further to this, on 11th October 2017, Cabinet approved the Council's Vision document, entitled 'Care, Support and Wellbeing of Adults in Lancashire', which sets out the intention to enable people to live as independently and healthily as possible, with the right level of care and support for themselves and their carers.

These proposals are wholly in line with the principles outlined within this document, which recognises that these supported housing flat schemes exist in limited numbers within Lancashire but that there needs to be more.

Question 7 – Identifying Initial Results of Your Analysis

As a result of the analysis has the original proposal been changed/amended, if so please describe.

As a result of this analysis it is intended to continue with the proposals. The flat schemes in existence within Lancashire are subject to high demand which is evidence of their popularity. There is a clear need to offer more of this type of accommodation both to satisfy demand from new service users entering the system and also existing service users who may be required to move from their

current accommodation if it is deemed to be not viable for the reasons outlined in this report.

These proposals are also in line with the recently issued Housing with Care and Support Strategy 2018-2025 and the Council's recently issued Vision document, entitled "Care, Support and Wellbeing of Adults in Lancashire"

Note that this Equality Analysis may be subject to revision and updating following consultation with all stakeholders, as listed in Question 4.

Question 8 - Mitigation

Will any steps be taken to mitigate/reduce any potential adverse effects of the proposal?

The following risks have been identified

Risk	Mitigation
1.It is intended that housing providers/social landlords will invest and build the flat schemes with no financial contribution from the Council, either for build costs or for payment of rent for vacancies. The risk therefore is that this is unacceptable for developers to proceed.	Research with other Councils and preliminary discussions with local housing providers has shown housing providers are fully prepared accept the risks when working in partnership with the Council
2.People do not move from their current setting into new flat schemes	In order to maximise the accommodation options for people, this will require a partnership approach from service users, carers, service providers and statutory agencies and so will require a communication strategy that ensures the correct people are fully informed and enabled to have a voice during this period of change. Also, the impact to people who could potentially be identified as suitable for moving into flat schemes would need to be addressed. Advocacy services will be required for some service users and best interest decisions may

	<p>need to be taken which would have implications for the length of time this would take.</p> <p>A tenant will not give notice on a tenancy until a suitable alternative has been identified and a timescale for moving agreed with all parties.</p>	
<p>3.National guidance, e.g. 'Building the Right Home' guidance in 2016 states that</p> <p><i>"Housing with 6 or more people can quickly become institutionalised and Commissioners should carefully consider the service design when creating schemes of multiple units within close proximity to ensure the service enables the tenants to have control over where they live and who provides their support"</i></p> <p>Size of schemes is also reflected in the national guidance 'Building the Right Support' issued in 2015 and endorsed by the Care Quality Commission who work to these guidelines when dealing with registration requirements of supported housing schemes.</p>	<p>Having ongoing discussions with CQC. Also, research with other Councils has shown that if the scheme is built with the correct ethos in line with national guidance then larger schemes are acceptable.</p>	
<p>4.The anticipated savings are not realised due to unexpected costs</p>	<p>Being clear at the outset around the model of support for background and individual support and having signed agreements with providers around issues such as no financial responsibility for vacancies.</p>	
<p>5. If there are any mental capacity issues around a proposed move to a flat scheme, this could involve the Court of Protection and lengthen timescales which may then impact on keeping the vacancy open until the issues are resolved</p>	<p>Involving mediation/advocacy at an early stage may prevent the need for more formal proceedings</p>	

6. Lack of staff resources to carry out assessments and facilitate moves to flat scheme accommodation	Recruitment of a specific social work team with a defined remit for this project	
7. Legal implications in relation to Housing Management Agreements or Support Contracts - In some circumstances there may be legally binding obligations within an HMA or a Support Contract which prevent the Local Authority or Support Provider from ending the HMA early.	This should not prevent consideration being given to the suitability of an individual to remain in a tenancy if it does not meet their needs. The Terms of each HMA will be subject to review and where possible an HMA will be renegotiated with the Housing Provider to ensure that it is fit for purpose.	

Question 9 – Balancing the Proposal/Countervailing Factors

This weighs up the reasons for the proposal – e.g. need for budget savings; damaging effects of not taking forward the proposal at this time – against the findings of the analysis.

The proposal has at its core a desire to enhance outcomes for individuals by providing a high quality living environment within the community, with the right level of support whilst also achieving significant value for money and savings by creating a more efficient support model.

The supported housing model was originally developed in response to the closure of the old long stay hospitals around 30 years ago and has become the main accommodation and support option for people with a learning disability, as well as some people with mental health problems and physical disabilities. However, this service offer needs modernising for the 21st century. It is not regarded as the norm for adults to live as a group in a shared house and other issues have arisen over time :

- There are often incompatibility issues between service users sharing houses which makes filling the vacancy difficult if a service user leaves.
- There are currently around 170 vacancies within supported housing
- The Council contributes to paying the rental on the vacancy with some properties which represents a cost of £1.4m per year
- Many people expressly do not want to share – but want their own independent accommodation with their own front door

Flat schemes offer good quality self contained accommodation with support which is aimed at maximising independence. They also cost comparably less due to staff costs being divided across a number of service users and benefitting from

economies of scale, e.g. core/background staff support can be shared between up to 12 people.

Question 10 – Final Proposal

In summary, what is the final proposal and which groups may be affected and how?

The final proposal is a long term solution to the current issues affecting the Council's supported housing service. Primarily it is aimed at increasing the number of flat schemes whilst offering existing service users living in properties which are defined as no longer viable or in residential care, the opportunity to move into new flat accommodation

This proposal is intended to

- Modernise the offer of supported housing for all client groups. Most accommodation is currently in the form of shared housing but there is a need for more flat scheme accommodation which offer greater independence.
- Decommission some 1, 2 and 3 person properties. Some shared housing is now not fit for purpose and/or offers poor value for money. The presents opportunities for individuals to move to newer flat scheme accommodation.
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- Achieve savings and better value for money through a more efficient model and establish a sustainable offer of supported housing with care and support for the future

Question 11 – Review and Monitoring Arrangements

What arrangements will be put in place to review and monitor the effects of this proposal?

The proposals will have formal project management structure and governance arrangements.

Governance will be put into place led by the Head of Service for Learning Disabilities, Autism and Mental Health and monitored on a daily basis by the

County Review and Remodelling Manager. The LDA Cluster Board will offer a forum for progress updates to stakeholders.

Equality Analysis Prepared By Jon Blackburn

Position/Role Policy, Information and Commissioning Manager

Equality Analysis Endorsed by Line Manager and/or Service Head
Dave Carr

Decision Signed Off By

Cabinet Member or Director

For further information please contact

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