

APPENDIX D

Equality & Human Rights Impact Assessment (EHRIA)

This Equality and Human Rights Impact Assessment (EHRIA) will enable you to assess the **new, proposed or significantly changed** policy/ practice/ procedure/ function/ service** for equality and human rights implications.

Undertaking this assessment will help you to identify whether or not this policy/ practice/ procedure/ function/ service** may have an adverse impact on a particular community or group of people. It will ultimately ensure that as an Authority we do not discriminate and we are able to promote equality, diversity and human rights.

Before completing this form please refer to the EHRIA [guidance](#), for further information about undertaking and completing the assessment. For further advice and guidance, please contact your [Departmental Equalities Group](#) or equality@leics.gov.uk

***Please note: The term 'policy' will be used throughout this assessment as shorthand for policy, practice, procedure, function or service.*

Key Details	
Name of policy being assessed:	Prevention Services – Supporting Independence in Older People
Department and section:	Strategic Planning & Commissioning
Name of lead officer/ job title and others completing this assessment:	Amanda Price Amisha Chauhan
Contact telephone numbers:	0116 3057364 / 0116 3059419
Name of officer/s responsible for implementing this policy:	Strategic Planning & Commissioning Officers; Ian Mellor, Carin Davies, Louise Melbourne, Martin Hall and Amisha Chauhan
Date EHRIA assessment started:	EHRIA process started: 26th February 2014 Reviewed following consultation: 14th July 2014
Date EHRIA assessment completed:	5 th August 2014

Section 1: Defining the policy

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You should begin this assessment by defining and outlining the scope of this policy. You should consider the impact or likely impact of the policy in relation to all areas of equality, diversity and human rights, as outlined in Leicestershire County Council's Equality Strategy.

1	<p>What is new or changed in this policy? <i>What has changed and why?</i></p> <p><i>Background</i></p> <p>The Strategic Planning and Commissioning Team has led on a review of the Adults and Communities Department's prevention services, with assistance from the Department's Market Development and Compliance teams (henceforth known as 'the review team'). Services included in the review were defined as 'early intervention and prevention services' in a report to Cabinet in June 2013. All of the contracts for these services were extended up to a maximum of 30th September 2015 in order to allow sufficient time for the prevention review and to ensure an overarching 'prevention offer'. Delivery of this prevention model is also set against savings targets set in the Medium Term Financial Strategy (MTFS) 2014-2018. It is important to note that current service provision under these contracts will cease in 2015 and be replaced by a new prevention offer (as described below).</p> <p>Details of the proposed prevention offer were submitted to Cabinet in April 2014 and permission granted by Cabinet to consult on future commissioning options. Accordingly, a formal public consultation exercise on this prevention offer was carried out 14th April – 13th July 2014. The findings of the consultation have been used to further inform the prevention offer and specific commissioning options for individual service groupings that fall within this wider prevention offer. This EHRIA forms one of a series, each dealing with the impacts of these individual service groupings (e.g. older people, other vulnerable people and so on). Each EHRIA will provide detail on proposed changes to service delivery for each of the main service groups included within the review and will explore the impacts of these changes in relation to the Human Rights Act and Equalities Act. They will also reflect on how proposed elements of service delivery will contribute to the overall prevention model. All of the EHRIsAs will be published in conjunction with a further Cabinet report in September 2014 which will provide members with the findings of the prevention review and public consultation and will make recommendations about the future of the prevention offer.</p> <p>This EHRIA is concerned with the following service grouping – 'Supporting Independence in Older People'.</p> <p>Prior to giving specific information about the proposed commissioning for Supporting Independence in Older People it is important to provide a summary of the overall prevention offer. This will provide some context for the proposed changes to current service delivery for the Adults and Communities prevention services as a whole and changes to service delivery for other vulnerable people.</p> <p>The development of a new prevention offer reflects a longer-term strategic vision, with an emphasis upon aligning services to need and a move towards a robust outcomes framework underlying all commissioning activity. It also reflects savings required against prevention services as set out in the MTFS, 2014-2018. The main focus of the prevention offer is</p>
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'secondary prevention' as defined by Public Health (2012): *"aimed at identifying people at risk and halting or slowing down any deterioration. Interventions are aimed at identifying people at risk of specific health conditions or events (such as strokes or falls) or those that have existing low level social care needs"*. Full details of the prevention offer can be found in the April Cabinet report –

<http://politics.leics.gov.uk/ieListDocuments.aspx?CId=135&MId=3989&Ver=4>

As stated above, this EHRIA is concerned with commissioning proposals for 'Supporting Independence in Older People'. Current service provision for this group comprises a mixture of floating support or accommodation-based services.

The service is currently provided by 12 providers across the county, and the combine contract value for 2014/15 is £2.2m.

The contracts for the existing Supporting Independence in Older People support have been extended up to a maximum of 30th September 2015.

Although these services represent a mixture of accommodation-based and floating support, there are common elements to the service delivery. All of the services are expected to offer a flexible support package tailored to the support needs of individuals. Support is focussed on a range of eligible support tasks, including:

Help in setting up and maintaining home or tenancy
 Advice, advocacy and liaison
 Help in managing finances and benefit claims
 Emotional support, counselling and advice
 Help in gaining access to other services
 Help in establishing social contacts and activities
 Help in establishing personal safety and security
 Supervision and monitoring of health and well being
 Peer support and befriending
 Help finding other accommodation
 Provision of community or social alarms
 Help maintaining the safety and security of the dwelling
 Advice and support on repair work/ home improvement work
 Access to local community organisations

There is no contract monitoring data available which demonstrates the actual number of clients currently receiving a service. However, the current contract funds a total of 81 schemes which equates to 6,633 units.

The following key points arising from the consultation exercise are relevant in the context of this EHRIA and proposed commissioning for Supporting Independence in Older People:

- There was a broad consensus that the Department should commission some form of support for other people
- There was broad agreement that it was important to continue to support older people in the county
- There was broad agreement that £500,000 was a suitable allocation for future provision.

However, following consultations with key stakeholders and districts it is felt that the risks associated with reducing the level of investment to Supporting Independence in Older People is far less than the risks associated with supporting homelessness, sight loss and dual sensory impairment. Therefore the proposed reinvestment for older persons will be

	<p>£240,000. This represents an 89% reduction in investment for this service group.</p> <p>A total of 17 customer events at existing sheltered schemes took place. Following this formal consultation exercise and taking in to account the views of current customers, providers and stakeholders, the following proposal is being recommended:</p> <ul style="list-style-type: none"> • Investment shall be tenure neutral for older persons (at retirement age) in Leicestershire. • Key priorities for support will be identification, reducing isolation and supporting independence. <p>During the consultation period, 6 out of the current 12 providers indicated that they shall continue to provide housing related support to its existing clients once the Departments funding ceases in September 2015. Others have either</p> <ul style="list-style-type: none"> • already ended their contracts or • confirmed they are exploring alternative options for delivery but are not yet able to confirm if the provision will continue <p>It should be noted that as the Assistive Technology (AT) service has been commissioned that in the event of any providers not continuing with the current support service that clients will still receive the alarm service (pendants/pull cords) which is payable direct to the AT provider (Tunstall).</p> <p>In order to secure the most value out of the remaining funding it has been recommended that it contributes to the proposed Lightbulb project, in partnership with Health, Districts, Housing and Local Authority. This project intends to enable and empower people, especially older people, to remain independent at home for longer. This offer will cover a wide range of support; handy person services, recycled furniture, affordable warmth advice, occupational assessment services and minor and major adaptations. With an investment of £240k added to this project it is proposed that districts shall identify citizens of Leicestershire that need support which will enhance independence and focus on reducing isolation.</p>
2	<p>Does this relate to any other policy within your department, the Council or with other partner organisations? <i>If yes, please reference the relevant policy or EHRIA. If unknown, further investigation may be required.</i></p> <p>The development of the Adults and Communities Prevention offer forms part of a wider unified prevention offer for Leicestershire's Communities that has been developed as part of the Better Care Fund. The Better Care Fund (formerly the Integration Transformation Fund) is a single pooled budget to support health and social care services to work more closely together in local areas. It forms an important element of strategic planning in both health and social care. In Leicestershire part of the Better Care Fund will be invested in a unified prevention offer, including funding for Local Area Coordination. The intention is that by 2018 there will be a comprehensive offer for community-based prevention for the citizens of Leicestershire, bringing together all the resources available to Local Councils and the NHS. Commissioning options arising out of the prevention review and departmental prevention offer have been developed to be aligned with and form part of this unified prevention offer, in particular Local Area Coordination.</p> <p>Throughout the review process it has been recognised that the scale of the proposed changes has the potential to impact on a range of services commissioned or offered by the department (both adult social care and communities and wellbeing). These impacts could be</p>

	<p>varied, including:</p> <ul style="list-style-type: none"> • If successful, the prevention offer could lead to a reduction in demand and future pressure on budgets and services such as residential and domiciliary care and carer's services. • It has been identified that a number of existing housing related support services need to be aligned with the care pathway as the individuals currently accessing the services are eligible for adult social care support. <p>The development of a new prevention offer is also accepted to have implications for partners. Indeed, the contribution of partner agencies and organisations, either directly or indirectly through their own commissioning activity is considered essential to the success of the Departmental and wider unified prevention offer. Discussions with partner organisations have therefore been essential during the review process and public consultation to establish a partnership approach to the development of commissioning options for the Departmental prevention offer.</p>										
3	<p>Who are the people/ groups (target groups) affected and what is the intended change or outcome for them?</p> <p>The prevention review and commissioning options for the Departmental prevention offer have the potential to affect anybody living in Leicestershire aged 18 years or over (i.e. of adult age). However, it should be noted that this provision will be specifically available to older persons (at retirement age).</p> <p>As described above, the purpose of the review was to develop a Departmental prevention offer with an emphasis upon aligning services to need and a move towards a robust outcomes framework for all commissioning activity. This strategic shift is also set against the MTFS – the scale of required savings means that commissioning in a different way and at a reduced level of investment. Inevitably, this has the potential to impact upon on all individuals who currently access or would potential access prevention services.</p> <p>Drawing on information derived from the prevention review, public consultation exercise and discussions with stakeholders, the proposed commissioning for Supporting Independence in Older People have been developed with a number of key aims:</p> <ul style="list-style-type: none"> • To identify and support those at risk of isolation • Promote independence • That new service provision will be outcomes focussed <p>Full details of how the commissioning options have been developed will be set out in a report which will go to Cabinet in September 2014.</p>										
4	<p>Will this policy meet the Equality Act 2010 requirements to have due regard to the need to meet any of the following aspects? (Please tick and explain how)</p> <table border="1" data-bbox="268 1765 1417 2045"> <thead> <tr> <th data-bbox="268 1765 571 1798"></th> <th data-bbox="571 1765 687 1798">Yes</th> <th data-bbox="687 1765 804 1798">No</th> <th data-bbox="804 1765 1417 1798">How?</th> </tr> </thead> <tbody> <tr> <td data-bbox="268 1798 571 2045">Eliminate unlawful discrimination, harassment and victimisation</td> <td data-bbox="571 1798 687 2045">X</td> <td data-bbox="687 1798 804 2045"></td> <td data-bbox="804 1798 1417 2045">The review process (including the strategic review of existing service provision, formal public consultation and discussions with stakeholders and partner organisations) has enabled a good overview of preventative services – in terms of determinants, interventions that help aid recovery, and to</td> </tr> </tbody> </table>				Yes	No	How?	Eliminate unlawful discrimination, harassment and victimisation	X		The review process (including the strategic review of existing service provision, formal public consultation and discussions with stakeholders and partner organisations) has enabled a good overview of preventative services – in terms of determinants, interventions that help aid recovery, and to
	Yes	No	How?								
Eliminate unlawful discrimination, harassment and victimisation	X		The review process (including the strategic review of existing service provision, formal public consultation and discussions with stakeholders and partner organisations) has enabled a good overview of preventative services – in terms of determinants, interventions that help aid recovery, and to								

				establish what service provision is most likely to benefit the people of Leicestershire in a way that is cost-effective to the department. It has also enabled identification of those groups and individuals who are likely to benefit from the proposed commissioning intentions. Conversely, it has also allowed consideration of any groups or individuals who might be adversely affected by the proposals and to establish what mitigating actions are required to enable them to access other support and services.
	Advance equality of opportunity between different groups	X		As above.
	Foster good relations between different groups	X		As above. In addition, the review process has also sought to establish community opportunities for those experiencing problems and using the services to access preventative services alongside other community-based/universal services. This has the potential to encourage community cohesion and develop relations between different groups.

Section 2: Equality and Human Rights Impact Assessment (EHRIA) Screening

Section 2: Equality and Human Rights Impact Assessment Screening

The purpose of this section of the assessment is to help you decide if a full EHRIA is required.

If you have already identified that a full EHRIA is needed for this policy/ practice/ procedure/ function/ service, either via service planning processes or other means, then please go straight to [Section 3](#) on Page 7 of this document.

Section 2

A: Research and Consultation

5.	Have the target groups been consulted about the following?	Yes	No*
	a) their current needs and aspirations and what is important to them;	X	
	b) any potential impact of this change on them (positive and negative, intended and unintended);	X	
	c) potential barriers they may face	X	

6.	If the target groups have not been consulted directly, have representatives been consulted or research explored (e.g. Equality Mapping)?	<p>A formal public consultation exercise was conducted (April to July 2014). The consultation documents (including information sheet and questionnaire) were accessible to the target groups (including current customers), the general public, providers and stakeholders. Specific events were also held with customers, providers and stakeholders as part of the review process and the consultation period. In addition, research into prevention services and the role of preventative services has been undertaken throughout the review process to inform decision making and commissioning proposals.</p> <p>The consultation process was subject to the Department's Research Governance Framework (RGF) to ensure that the process was carried out to high standards in line with national guidance on health and social care research as set out by the Department of Health (2010)</p>	
7.	Have other stakeholder groups/ secondary groups (e.g. carers of service users) been explored in terms of potential unintended impacts?	X	
8.	*If you answered 'no' to the question above, please use the space below to outline what consultation you are planning to undertake, or why you do not consider it to be necessary.		

Section 2

B: Monitoring Impact

8.	Are there systems set up to:	Yes	No
	<p>a) monitor impact (positive and negative, intended and unintended) for different groups;</p> <p>b) enable open feedback and suggestions from different communities</p>	<p>This will depend on how the commissioning of the support is realised. Where LCC can influence the contracts, then standard contract monitoring procedures (including annual and quarterly monitoring) will exist for any new service provision. It will continue to be a contractual obligation for services to receive complaints and commendations. In addition, the Department will</p>	

				seek to obtain feedback from existing and new customers as part of ongoing monitoring of the impact of these proposals (see improvement plan, below). However, in the event that the commissioning of this support is led by Chief Executives through the Lightbulb project monitoring procedures will be decided by them – the department would, however, seek to influence this at the service design stage to ensure relevant monitoring is undertaken.	
Note: If no to Question 8, you will need to ensure that monitoring systems are established to check for impact on the protected characteristics.					
Section 2					
C: Potential Impact					
9.	Use the table below to specify if any individuals or community groups who identify with any of the ' protected characteristics ' may <u>potentially</u> be affected by this policy and describe any positive and negative impacts, including any barriers.				
		Yes	No	Comments	
	Age	X		<p>The proposed commissioning for Supporting Independence in Older People will be available to all older persons (at retirement age). There will be no upper age limit restricting access to the proposed services.</p> <p>This represents no real change in terms of eligibility by age from current service provision, as current provision is open to anyone aged over 60 years, reasons for no change are due to the following:</p> <ul style="list-style-type: none"> It is believed that the average retirement age is increasing as statistics published by the Office for National Statistics reveal that that people are working longer than they used to. The average age at which people leave the labour market rose from 63.8 years to 64.6 years for men and from 61.2 years to 62.3 years for women between 2004 and 2010. <p>http://www.ons.gov.uk/ons/dcp29904_256641.pdf</p>	

			<ul style="list-style-type: none"> Current data shows that there are currently 130,400 people aged 65 and over in Leicestershire constituting 19.6% of the adult population. This is predicted to rise to 21.08% of the adult population by 2020. And therefore, this age group remains a priority whereby identification is key. (http://www.poppi.org.uk/index.php?pageNo=314&areaID=8640&loc=8640) <p>It should be noted that in the event of current providers not continuing to support existing customers, and if the Light bulb project does not receive the maximum funding award (£10m) then the reduced level of investment may in turn limit the numbers of people able to access the proposed service, regardless of their age. Consideration will need to be given to ways to mitigate against this potential reduction in capacity (such as shortening the length of intervention to increase potential utilisation and throughput) and these migration strategies will be discussed in Section 3 of this EHRIA and the appended Improvement Plan.</p>
	Disability	X	<p>The proposed commissioning model for Supporting Independence in Older People will be available to all people regardless of their disability.</p> <p>This represents no change in terms of eligibility by disability from current service provision.</p> <p>National statistics by DLF (http://www.dlf.org.uk/content/key-facts) state that there are over 10 million disabled people in Britain, of whom 5 million are over state pension age.</p> <p>It may therefore be assumed that future customers of the proposed service may have a disability. With an ageing population the main disability is felt to be mobility and as such this cohort of people is more prone to needing support with independence and minimising isolation.</p> <p>Accordingly, there is no intention to introduce any exclusion around access to proposed support with regards to disability. Consequently, there will be no anticipated impact on this characteristic.</p> <p>It should be noted that in the event of current providers not continuing to support existing</p>

			<p>customers, and if the Light bulb project does not receive the maximum funding award (£10m) then the reduced level of investment may in turn limit the numbers of people able to access the proposed service, regardless of their disability.</p> <p>Consideration will need to be given to ways to mitigate against this potential reduction in capacity (such as shortening the length of intervention to increase potential utilisation and throughput) and these migration strategies will be discussed in Section 3 of this EHRIA and the appended Improvement Plan.</p>
	Gender Reassignment	X	<p>The proposed commissioning model for Supporting Independence in Older People will be available to all people regardless of their gender reassignment. This represents no change in terms of eligibility by disability from current service provision.</p>
	Marriage and Civil Partnership	X	<p>Contract monitoring for the existing older person housing related support service does not record whether clients are married, in a civil partnership or have left a marriage or civil partnership. It is therefore not possible to draw conclusions around the potential impact of marriage or civil partnerships on access to existing older person services.</p> <p>The proposed commissioning model for Supporting Independence in Older People will be available to all people regardless of this characteristic and therefore this represents no change in terms of eligibility.</p> <p>In addition, national data (http://www.ons.gov.uk/ons/rel/family-demography/older-people-divorcing/2011/sty-divorce.html) illustrates that between 2007 and 2011, the latest year for which statistics are available, 92 Civil Partnership dissolutions in England and Wales were granted to those aged 60 and over. This represents less than 3% of all dissolutions. By comparison in 2011, 8% of divorces were granted to men aged 60 and over and 5% were granted to women in the same age group. However this analysis is limited because of the small number of dissolutions that have taken place. With this in mind it is assumed that as population ages there will be a greater chance of future clients not being in a civil relationship that require some</p>

			<p>form of support.</p> <p>Accordingly, there is no intention to introduce any exclusions around access to proposed Supporting Independence in Older People services with regards to marriage or civil partnership. The proposed services will therefore not have an impact upon those who are married or in a civil partnership. Consequently, there will be no anticipated impact on this characteristic.</p> <p>It should be noted that in the event of current providers not continuing to support existing customers, and if the Light bulb project does not receive the maximum funding award (£10m) then the reduced level of investment may in turn limit the numbers of people able to access the proposed service, regardless of their marital status. Consideration will need to be given to ways to mitigate against this potential reduction in capacity (such as shortening the length of intervention to increase potential utilisation and throughput) and these migration strategies will be discussed in Section 3 of this EHRIA and the appended Improvement Plan.</p>
	Pregnancy and Maternity	X	<p>Current contract monitoring data for the existing Older Person Housing Related Support service does not capture whether customers are pregnant or experiencing maternity. It is not possible, therefore, to make statements about current service provision, customers and pregnancy and maternity. However, based on the support being targeted to older people it is assumed that there is very little chance of customers experiencing pregnancy and/or maternity.</p> <p>Accordingly, there is no intention to introduce any exclusions around access to proposed Supporting Independence in Older People services with regards to Pregnancy and Maternity. Consequently, there will be no anticipated impact on this characteristic.</p> <p>It should be noted that in the event of current providers not continuing to support existing customers, and if the Light bulb project does not receive the maximum funding award (£10m) then the reduced level of investment may in turn limit the numbers of people able to access the proposed</p>

			<p>service, regardless of pregnancy and maternity. Consideration will need to be given to ways to mitigate against this potential reduction in capacity (such as shortening the length of intervention to increase potential utilisation and throughput) and these migration strategies will be discussed in Section 3 of this EHRIA and the appended Improvement Plan.</p>
	Race	X	<p>There is currently no up to date contract monitoring data which details the race of the current services clients. However, based on historic contract monitoring visits by the Departments non-regulated compliance officers it has been evidenced that the majority of clients are White British origin. Providers promote services however, in some geographical areas there is not an ethnic population, and/or in some services have found that due to culture families prefer to support within the family unit and do not like to receive external help/support. With this in mind, the key priority/task for the proposed Supporting Independence in Older People shall be identification and reducing isolation. This exact way of doing this will be examined, with support from stakeholders during the service modelling stage. As we are an ageing society and as retirement age increases (as referred within the age section) it is assumed that not many cultures will have the choice of supporting its elders within the family unit and therefore this cohort will need to access the proposed commissioned service. In support of this assumption there is evidence that people from black, minority ethnic backgrounds can find it difficult to access services and are less likely to be aware of the housing and support options available to them. Accordingly, there is no intention to introduce any exclusions around access to proposed services. The proposed services will therefore not have an impact upon those from different races. Consequently, there will be no anticipated impact on this characteristic.</p> <p>It should be noted that in the event of current providers not continuing to support existing customers, and if the Light bulb project does not receive the maximum funding award (£10m) then the reduced level of investment may in turn limit</p>

			<p>the numbers of people able to access the proposed service, regardless of their age. Consideration will need to be given to ways to mitigate against this potential reduction in capacity (such as shortening the length of intervention to increase potential utilisation and throughput) and these migration strategies will be discussed in Section 3 of this EHRIA and the appended Improvement Plan.</p>
	Religion or Belief	X	<p>As with race, there is broad recognition that some cultural beliefs can act as barriers to people seeking help.</p> <p>There is currently no up to date contract monitoring data which details the religion and/or belief of the current services clients. However, based on historic contract monitoring visits by the Departments non-regulated compliance officers it has been evidenced that the majority of clients are Christian. However, as cited above, it is likely given the diverse population of Leicester and Leicestershire that customers accessing the current service will express a range of religions and beliefs.</p> <p>Accordingly, there is no intention to introduce any exclusions around access to proposed Supporting Independence in Older People services with regards to religion or belief. The proposed services will therefore not have an impact upon those from with different religious backgrounds or beliefs.</p> <p>It should be noted that in the event of current providers not continuing to support existing customers, and if the Light bulb project does not receive the maximum funding award (£10m) then the reduced level of investment may in turn limit the numbers of people able to access the proposed service, regardless of their religion or belief. Consideration will need to be given to ways to mitigate against this potential reduction in capacity (such as shortening the length of intervention to increase potential utilisation and throughput) and these migration strategies will be discussed in Section 3 of this EHRIA and the appended Improvement Plan.</p>
	Sex	X	<p>The proposed commissioning for Supporting Independence in Older People will be available to all sexes.</p> <p>This represents no change in terms of eligibility by sex from current service provision.</p> <p>Data around ageing population by sex</p>

			<p>(http://www.poppi.org.uk/index.php?pageNo=316&loc=&mapOff=1) shows that there are a higher percentage of females (54.2%) than males (45.8%) in Leicestershire.</p> <p>Accordingly, there is no intention to introduce any exclusions around access to proposed Supporting Independence in Older People services with regards to sex.</p> <p>Consequently, there will be no anticipated impact on this characteristic.</p> <p>It should be noted that in the event of current providers not continuing to support existing customers, and if the Light bulb project does not receive the maximum funding award (£10m) then the reduced level of investment may in turn limit the numbers of people able to access the proposed service, regardless of their sex. Consideration will need to be given to ways to mitigate against this potential reduction in capacity (such as shortening the length of intervention to increase potential utilisation and throughput) and these migration strategies will be discussed in Section 3 of this EHRIA and the appended Improvement Plan.</p>
	Sexual Orientation	X	<p>There is no data concerning sexual orientation in contract monitoring data for the existing Older Persons Housing Related Support services as there is no requirement for providers to collect this information.</p> <p>Accordingly, there is no intention to introduce any exclusions around access to proposed services with regards to sexual orientation. The proposed services will therefore not have an impact upon this protected characteristic. Consequently, there will be no anticipated impact on this characteristic.</p> <p>Accordingly, there is no intention to introduce any exclusions around access to proposed services. The proposed services will therefore not have an impact upon those from different races. Consequently, there will be no anticipated impact on this characteristic.</p> <p>It should be noted that in the event of current providers not continuing to support existing customers, and if the Light bulb project does not receive the maximum funding award (£10m) then the reduced level of investment may in turn limit</p>

			<p>the numbers of people able to access the proposed service, regardless of their sexual orientation. Consideration will need to be given to ways to mitigate against this potential reduction in capacity (such as shortening the length of intervention to increase potential utilisation and throughput) and these migration strategies will be discussed in Section 3 of this EHRIA and the appended Improvement Plan.</p>
	<p>Other groups e.g. rural isolation, deprivation, health inequality, carers, asylum seeker and refugee communities, looked after children, deprived or disadvantaged communities</p>	X	<p>A key priority for the proposed Supporting Independence in Older People is to address such issues as isolation, and deprivation, by ensuring that Older People are identified on the onset. As service specifications are developed, further information will be sought from key partners and stakeholders to determine rural and deprived areas. In addition, to ensure that the correct referral routes for the service are identified and that appropriate signposting to specialist and alternative service provision are embedded in the service design.</p> <p>It should be noted that in the event of current providers not continuing to support existing customers, and if the Light bulb project does not receive the maximum funding award (£10m) then the reduced level of investment may in turn limit the numbers of people able to access the proposed service, regardless of their age. Consideration will need to be given to ways to mitigate against this potential reduction in capacity (such as shortening the length of intervention to increase potential utilisation and throughput) and these migration strategies will be discussed in Section 3 of this EHRIA and the appended Improvement Plan.</p>
	<p>Community Cohesion</p>	X	<p>The proposals for Supporting Independence in Older People will seek to address some of the issues such as social isolation by offering a level of help and support to Older People. Eligible tasks for the service will have a focus on supporting independence and community integration.</p> <p>The proposed Supporting Independence in Older People along with the Lightbulb project will be rolled out at the same time as wider, unified prevention offer. Central to that wider offer are elements such as community development and Local Area Coordination (LAC) and it is anticipated that customers who access the proposed service may also benefit from these elements.</p>

10.	Are the human rights of individuals <u>potentially</u> affected by this proposal? Could there be an impact on human rights for any of the protected characteristics? (Please tick)		
	Explain why you consider that any particular article in the Human Rights Act may apply to your policy/ practice/ function or procedure and how the human rights of individuals are likely to be affected below: [NB. Include positive and negative impacts as well as barriers in benefiting from the above proposal]		
	Yes	No	Comments
Part 1: The Convention- Rights and Freedoms			
Article 2: Right to life	X		As part of new service design and new contractual obligations, all new service providers will be expected to identify any risks to service users and professionals and to have Health & Safety and safeguarding policies and procedures in place.
Article 3: Right not to be tortured or treated in an inhuman or degrading way	X		As part of new service design and new contractual obligations, all new service providers will be expected to identify any risks to service users and professionals and to have Health & Safety, whistleblowing and safeguarding policies and procedures in place.
Article 4: Right not to be subjected to slavery/ forced labour		X	N/A
Article 5: Right to liberty and security		X	N/A
Article 6: Right to a fair trial		X	N/A
Article 7: No punishment without law		X	N/A
Article 8: Right to respect for private and family life		X	N/A
Article 9: Right to freedom of thought, conscience and religion		X	N/A
Article 10: Right to freedom of expression		X	N/A
Article 11: Right to freedom of assembly and association		X	N/A
Article 12: Right to marry		X	N/A
Article 14: Right not to be discriminated	X		This article is relevant to the proposed Supporting Independence in Older People

	against			services because these services will offer support to individuals with various needs such as mental health, learning disabilities, physical disabilities, sensory impairment etc. The new services are expected to be delivered without discrimination of any kind to service users and staff. All new services are expected to be delivered without discrimination of any kind to service users and staff and this will be a specific contractual obligation.
Part 2: The First Protocol				
	Article 1: Protection of property/peaceful enjoyment	X		The proposed supporting independence in Older People will have as a principal service aim and outcome for customers support to lead a healthy and independent life and independent living arrangements.
	Article 2: Right to education		X	N/A
	Article 3: Right to free elections		X	N/A
Section 2				
D: Decision				
11.	Is there evidence or any other reason to suggest that:	Yes	No	Unknown
	a) this policy could have a different affect or adverse impact on any section of the community;	X		
	b) any section of the community may face barriers in benefiting from the proposal	X		
12.	Based on the answers to the questions above, what is the likely impact of this policy?			
	No Impact <input type="checkbox"/>	Positive Impact <input type="checkbox"/>	Neutral Impact <input type="checkbox"/>	Negative Impact or Impact Unknown <input checked="" type="checkbox"/>
Note: If the decision is 'Negative Impact' or 'Impact Not Known' an EHRIA Report is required.				
13.	Is an EHRIA report required?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	

Section 2: Completion of EHRIA Screening

Upon completion of the screening section of this assessment, you should have identified whether an EHRIA Report is required for further investigation of the impacts of this policy.

Option 1: If you identified that an EHRIA Report is required, continue to [Section 3](#) on Page 7 of this document to complete.

Option 2: If there are no equality, diversity or human rights impacts identified and an EHRIA report is not required, continue to [Section 4](#) on Page 14 of this document to complete.

Section 3: Equality and Human Rights Impact Assessment (EHRIA) Report

Section 3: Equality and Human Rights Impact Assessment Report

This part of the assessment will help you to think thoroughly about the impact of this policy and to critically examine whether it is likely to have a positive or negative impact on different groups within our diverse community. It is also to identify any barriers that may detrimentally affect under-represented communities or groups, who may be disadvantaged by the way in which we carry out our business.

Using the information gathered either within the EHRIA Screening or independently of this process, this EHRIA Report should be used to consider the impact or likely impact of the policy in relation to all areas of equality, diversity and human rights as outlined in Leicestershire County Council's Equality Strategy.

Section 3

A: Research and Consultation

When considering the target groups it is important to think about whether new data needs to be collected or whether there is any existing research that can be utilised.

- 14.** Based on the gaps identified either in the EHRIA Screening or independently of this process, how have you now explored the following and what does this information/data tell you about each of the diverse groups?
- a) current needs and aspirations and what is important to individuals and community groups (including human rights);
 - b) likely impacts (positive and negative, intended and unintended) to individuals and community groups (including human rights);
 - c) likely barriers that individuals and community groups may face (including human rights)

Throughout the strategic review process, historic contract monitoring data for existing Housing Related Support for Older People service provision (which includes case studies and service user consultation) was examined in order to better understand existing service provision. This was supplemented during the formal consultation with service users (events at 17 schemes) and existing providers (1-1 meetings).

The purpose of all this work was to enable an understanding of the needs and aspirations of Older People. The overwhelming finding was:

- identifying those that require intervention
- maintaining independence
- reducing isolation
- Alarm service which provides a safety net in the event of an emergency

This review work also allowed risks associated with decommissioning the current Housing Related Support for Older Person services to be considered and an understanding of whether carers, the public and key stakeholders agree with the proposed commissioning model for carer support services.

Furthermore, the outcome of the formal consultation exercise showed broad consensus that the Council should continue to invest in supporting independence element of the prevention model – 66% of respondents to the consultation questionnaire said they strongly agreed, whereby only 1% strongly disagreed. Furthermore, 41% of respondents felt that the proposed level of investment for supporting independence was ‘about right’ (i.e. £500,000), whereas 15% felt this level of investment was ‘too high’ or ‘high’ and 28% said it was too low.

Stakeholders, providers of housing related support for older people and customers from existing services for older persons also indicated that in terms of future provision for Supporting Independence in Older People, there was an on-going need for supporting this cohort of people.

Using the findings from the strategic review and formal consultation exercise potential impacts and barriers upon the Protected Characteristics under the Equality Act 2010 and Human Rights articles have been identified (see above, Section 2). Of note, it has been recognised that in respect of the protected characteristics, there is the potential for all individuals (regardless of which protected characteristic they fall under) to experience an impact arising out of these proposals because the proposed level of reinvestment is being reduced. Therefore, those people who are tenure neutral in affect shall receive a much scaled down service to those who are in sheltered schemes. However, it should be noted that those in sheltered schemes shall be charged for the support service they receive if current providers continue to offer support to its tenants.

15.	Is any further research, data collection or evidence required to fill any gaps in your understanding of the potential or known effects of the policy on target groups?
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Throughout the strategic review process and formal consultation exercise research, data collection and evidence gathering has taken place from a variety of sources:

- Online and other published resources
- Contract monitoring data
- Information received from providers, customers and stakeholders
- Benchmarking information from other local authorities and commissioning organisations
- Results from consultation exercise (including responses from customers, providers, stakeholders, and the general public)

As described above, this research and data gathering has allowed a relatively comprehensive assessment of risks and impacts and those specific to the Equalities Act and Human Rights have been described above (see Section 2). However, it should be noted that the primary impact is the reduced in investment and therefore the number of people able to access the service will be limited regardless of the protected characteristic.

As the proposed service is developed, further information will be sought from these sources. Particular work will take place with the light bulb project team member to ensure that the correct referral routes for the service are identified and that appropriate signposting to specialist and alternative service provision are embedded in the service design. This further work will also enable other risks or impacts to be identified and resolved.

When considering who is affected by this proposed policy, it is important to think about consulting with and involving a range of service users, staff or other stakeholders who may be affected as part of the proposal.

16. Based on the gaps identified either in the EHRIA Screening or independently of this process, how have you further consulted with those affected on the likely impact and what does this consultation tell you about each of the diverse groups?

The formal consultation exercise for the prevention review was undertaken in order to engage as fully as possible with customers, providers and stakeholders and the general public in order to both understand people regarding existing and proposed service revisions and risks and impacts associated with the proposed changes.

The formal consultation exercise ran from 14th April until 13th July 2014. As part of the consultation exercise, the following were undertaken in respect of Supporting Independence in Older People :

- Series of provider workshops (including providers running existing services for Older People)
- Meetings with stakeholders (Housing Services Partnership, representatives from the local districts and boroughs in Leicestershire, Chief Executive Department)
- Series of workshops for members of the general public and customers
- Online and hard-copy questionnaires and consultation information sheets available for all
- Support from providers to assist customers to have their say on the consultation – either through completing questionnaires or events held by providers with their customers to gather comments

In response, 917 completed questionnaires were received (917 hard-copy responses and 175 online responses).

The consultation responses have shown that the following:

- There is broad consensus that it is right for the Council to commission some form of support for Supporting Independence in Older People
- Where directly asked about the Older Person provision, there was consensus that there should be continued investment in this form of support.

17. Is any further consultation required to fill any gaps in your understanding of the potential or known effects of the policy on target groups?

No – the consultation undertaken already is considered appropriate. As specified above (Section 3.15), some further engagement will occur with providers and stakeholders in the development of new service specifications.

Section 3

B: Recognised Impact

18. Based on any evidence and findings, use the table below to specify if any individuals or community groups who identify with any 'protected characteristics' are likely be affected by this policy. Describe any positive and negative impacts, including what barriers these individuals or groups may face.

	Comments
Please note: a comprehensive discussion of impact for each protected characteristic and article is provided above, in Section 2. Below, a summary is provided.	
Age	There will be no impact on age as the proposed services will be accessible for older people at retirement age (no upper age limit). A major barrier will be a reduced level of investment leading to a reduced number of people being able to access support.
Disability	There will be no impact on disability. A major barrier will be a reduced level of investment leading to a reduced number of people being able to access support.
Gender Reassignment	There will be no impact on gender reassignment. A major barrier will be a reduced level of investment leading to a reduced number of people being able to access support.
Marriage and Civil Partnership	There will be no impact regarding marriage and civil partnership. A major barrier will be a reduced level of investment leading to a reduced number of people being able to access support.
Pregnancy and Maternity	There will be no impact regarding pregnancy and maternity. A major barrier will be a reduced level of investment leading to a reduced number of people being able to access support.
Race	There will be no impact regarding race. A major barrier will be a reduced level of investment leading to a reduced number of people being able to access support.
Religion or Belief	There will be no impact regarding religion or belief. A major barrier will be a reduced level of investment leading to a reduced number of people being able to access support.
Sex	There will be no impact regarding sex. A major barrier will be a reduced level of investment leading to a reduced number of people being able to access support.
Sexual Orientation	There will be no impact regarding sexual orientation. A major barrier will be a reduced level of investment leading to a reduced number of people being able to access support.
Other groups e.g. rural isolation, deprivation, health inequality, carers, asylum seeker and refugee communities, looked after children, deprived or disadvantaged communities	There will be no impact relating to other groups. A major barrier will be a reduced level of investment leading to a reduced number of people being able to access support.

	Community Cohesion	There will be no impact relating to community cohesion. A major barrier will be a reduced level of investment leading to a reduced number of people being able to access support.
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19.	Based on any evidence and findings, use the table below to specify if any particular Articles in the Human Rights Act are <u>likely</u> apply to your policy. Are the human rights of any individuals or community groups affected by this proposal? Is there an impact on human rights for any of the protected characteristics?	
	Comments	
	Part 1: The Convention- Rights and Freedoms	
	Article 2: Right to life	Risks to service users and suitable policies relating to Health and Safety and safeguarding adults will be a requirement of new services commissioned under these proposals.
	Article 3: Right not to be tortured or treated in an inhuman or degrading way	It will be a requirement of the providers to have policies concerning safeguarding and whistleblowing, for example, and this will be a requirement of new services commissioned under these proposals.
	Article 4: Right not to be subjected to slavery/ forced labour	N/A
	Article 5: Right to liberty and security	N/A
	Article 6: Right to a fair trial	N/A
	Article 7: No punishment without law	N/A
	Article 8: Right to respect for private and family life	N/A
	Article 9: Right to freedom of thought, conscience and religion	N/A
	Article 10: Right to freedom of expression	N/A
	Article 11: Right to freedom of assembly and association	N/A
	Article 12: Right to marry	N/A
	Article 14: Right not to be discriminated against	The proposed Supporting Independence in Older People service has the potential to support people who represent some of the protected characteristics covered by the Equality Act (see above). New services will be expected to be delivered without any

		discrimination to customers.
Part 2: The First Protocol		
Article 1: Protection of property/ peaceful enjoyment		The proposed supporting independence in Older People will have as a principal service aim and outcome for customers support to lead a healthy and independent life and independent living arrangements.
Article 2: Right to education		N/A
Article 3: Right to free elections		N/A
Section 3		
C: Mitigating and Assessing the Impact		
Taking into account the research, data, consultation and information you have reviewed and/or carried out as part of this EHRIA, it is now essential to assess the impact of the policy.		
20.	If you consider there to be actual or potential adverse impact or discrimination, please outline this below. State whether it is justifiable or legitimate and give reasons.	
<p>As discussed above (Section 2), the principal impact of the proposed Supporting Independence in Older People will be a potential risk could be in the event of a provider not continuing to support its existing customers. However, it should be noted that regardless of existing provider intentions of future support that all existing customers will continue to receive the alarm service.</p> <p>This negative impact will not affect any one protected characteristic or article – it will be an impact experienced across the board and arises from the need to make savings against prevention services as set out in the Council’s MTFS. In the context of the savings that the Council has to make, this is a legitimate impact and in so much as it will not adversely affect any particular group (rather it will have an impact to all) and will not directly impact on the Department’s statutory responsibilities, it is an impact that it is justifiable.</p>		
N.B.		
<p>i) If you have identified adverse impact or discrimination that is <u>illegal</u>, you are required to take action to remedy this immediately.</p> <p>ii) If you have identified adverse impact or discrimination that is <u>justifiable or legitimate</u>, you will need to consider what actions can be taken to mitigate its effect on those groups of people.</p>		
21.	<p>Where there are potential barriers, negative impacts identified and/or barriers or impacts are unknown, please outline how you propose to minimise all negative impact or discrimination.</p> <p>a) include any relevant research and consultations findings which highlight the best way in which to minimise negative impact or discrimination</p> <p>b) consider what barriers you can remove, whether reasonable adjustments may be necessary, and how any unmet needs that you have identified can</p>	

	<p>be addressed</p> <p>c) if you are not addressing any negative impacts (including human rights) or potential barriers identified for a particular group, please explain why</p>
<p>There are a number of ways in which the negative impact of these proposals will be mitigated against, as follows:</p> <ul style="list-style-type: none"> • Reducing the length of intervention – the support is currently long-term, but in order to increase throughput and service utilisation a reduction will be considered as part of service modelling (e.g. reduced to 6 weeks). The rationale for this will be to maximise the number of interventions with a reduced investment. • Commissioning and service modelling based on outcomes (i.e. more targeted interventions) • Ensure effective signposting to other specialist and community-based support (including links to Local Area Coordinators and other elements of the wider Unified Prevention Offer) <p>These mitigation actions are designed to maximise the investment in the service through addressing ways to hopefully increase utilisation and throughput.</p>	
<p>Section 3 D: Making a decision</p>	
22.	Summarise your findings and give an overview as to whether the policy will meet Leicestershire County Council's responsibilities in relation to equality, diversity, community cohesion and human rights.
<p>It is considered that, despite the negative impact across all groups of potential customers, the Council will still meet its responsibilities in relation to equality, diversity, community cohesion and human rights. The level of savings to be made against all prevention services, including support for older people, means that there is likely to be reduction in service provision across the County.</p>	

<p>Section 3 E: Monitoring, evaluation & review of your policy</p>	
23.	<p>Are there processes in place to review the findings of this EHRIA and make appropriate changes? In particular, how will you monitor potential barriers and any positive/ negative impact?</p> <p>All new services will be subject to the Department's standard contract monitoring procedures (undertaken by the Department's non-regulated compliance team. In addition, after the first six months of service delivery, a review of the service will be undertaken in order to establish effectiveness and requirements for improvements. As part of that review, monitoring data will be considered and any equalities issues addressed with new providers. If required, an up-date will be provided to the Departmental Equality Group (DEG) after this review.</p>
23.	<p>How will the recommendations of this assessment be built into wider planning and review processes? <i>e.g. policy reviews, annual plans and use of performance management systems</i></p> <p><i>Ensure collecting relevant information around characteristics on monitoring forms.</i></p> <p>One of the key issues facing the review of existing service provision is a lack of robust monitoring data. In particular, existing data does not capture a lot of data in respect of equalities and human rights (for instance, information on many of the protected characteristics is not currently collected). As part of new service design and delivery, more robust outcomes and equality monitoring will be introduced.</p> <p>As stated above, as part of on-going service delivery, new service provision (if Light bulb project</p>

<p>is funded) will be subject to standard contract monitoring procedures (carried out by Chief Execs). In addition, after the first six months of service delivery, a review of the service will be undertaken in order to establish effectiveness and requirements for improvements. As part of that review, monitoring data will be considered and any equalities issues addressed with new providers. If required, an up-date will be provided to the Departmental Equality Group (DEG) after this review.</p>

**Section 3:
F: Equality and human rights improvement plan**

Please list all the equality objectives, actions and targets that result from the Equality and Human Rights Impact Assessment (EHRIA) (continue on separate sheets as necessary). These now need to be included in the relevant service plan for mainstreaming and performance management purposes.

Equality Objective	Action	Target	Officer Responsible	By when
Ensure that the specification for the new service model is outcome based and has clearly specified targeted interventions	Work with partners (including the local Borough and District Councils, Lightbult project board, LAC project board) to develop a specification that includes desired outcomes for customers, and to ensure there are not any duplication of support/services. These will be monitored through contract monitoring during the life of the contract.	The commissioned service is compliant with the Council's equality priorities, reflects the findings of the prevention strategic review and the comments of customers, providers and stakeholders gathered as part of formal consultation.	Strategic Planning and Commissioning, Light bulb project board and Corporate Procurement	By March 2015 – completion of specification for new service ahead of formal procurement process commencing. Throughout the life of the contract (contract monitoring).
Ensure that the specification for the new service model includes new timescales for length of intervention (proposed to be reduced from existing long term support) to encourage greater utilisation and throughput and more targeted interventions	Work with partners (including the local Borough and District Councils, Lightbult project board, LAC project board) to develop a specification that includes desired outcomes for customers, and to ensure there are not any duplication of support/services. These will be monitored through contract monitoring during the life of the contract.	The commissioned service is compliant with the Council's equality priorities, reflects the findings of the prevention strategic review and the comments of customers, providers and stakeholders gathered as part of formal consultation.	Strategic Planning and Commissioning, Light bulb project board and Corporate Procurement	By March 2015 – completion of specification for new service ahead of formal procurement process commencing. Throughout the life of the contract (contract monitoring).
Ensure that new services have	Work with partners (including	The commissioned service is	Strategic Planning and	

appropriate geographical spread.	the local Borough and District Councils, Light bulb project board, LAC project board) to develop a specification	compliant with the Council's equality priorities, reflects the findings of the prevention strategic review and the comments of customers, providers and stakeholders gathered as part of formal consultation.	Commissioning, Light bulb project board and Corporate Procurement	
Ensure that the specification for the new service model includes clearly specified referral routes, taking account of groups with known difficulties in accessing services (as identified in section 2 above) to avoid their exclusion.	Work with partners (including the local Borough and District Councils, Light bulb project board, LAC project board) to develop a specification	The commissioned service is compliant with the Council's equality priorities, reflects the findings of the prevention strategic review and the comments of customers, providers and stakeholders gathered as part of formal consultation.	Strategic Planning and Commissioning, Light bulb project board and Corporate Procurement	
Decommissioning of existing housing related support services for Housing Related Support for Older Persons	The Council has a duty of care to existing customers and contractual obligations with existing providers.	That existing customers feel supported and know what alternative support they can access if required and that existing providers are supported to end existing services	Compliance Officers (working with current providers)	By end of September 2015
Ensure that customers of existing service provision are aware of the changes to service provision and that where required, transitional arrangements are in place.	The Council has a duty of care to existing customers. Work with providers will be undertaken to establish which customers will continue to receive support from existing providers and to discuss the decommissioning process for existing service provision and transition to new service provision.	That existing customers feel supported and know what alternative support they can access if required	Compliance Officers (working with current providers)	By October 2015 – when new services are in place
If Light bulb project is funded: Ensure that new service	The service specification for the service will clearly state equality	The commissioned service will be compliant with the Council's	Chief Exec Department, Strategic Planning and Commissioning ,	By March 2015 – completion of specification for new service

<p>provision is equality compliant (see Section 2 above)</p>	<p>requirements (including reference to required policies and procedures around health and safety, safeguarding etc. (see above, Section 2). This will be tested through the procurement process and monitored during the life of the contract.</p>	<p>equality priorities.</p>	<p>Market Development (Procurement) and Compliance Officers</p>	<p>ahead of formal commissioning</p>
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Section 4: Sign off and scrutiny

Upon completion, the Lead Officer completing this assessment is required to sign the document in the section below.

It is required that this Equality and Human Rights Impact Assessment (EHRIA) is scrutinised by your [Departmental Equalities Group](#) and signed off by the Chair of the Group.

Once scrutiny and sign off has taken place, a depersonalised version of this EHRIA should be published on Leicestershire County Council's website. Please send a copy of this form to louisa.jordan@leics.gov.uk, Members Secretariat, in the Chief Executive's department for publishing.

Section 4

A: Sign Off and Scrutiny

Confirm, as appropriate, which elements of the EHRIA have been completed and are required for sign off and scrutiny.

Equality and Human Rights Assessment Screening

Equality and Human Rights Assessment Report

1st Authorised Signature (EHRIA Lead Officer):

Date:

2nd Authorised Signature (DEG Chair):



Heather Pick

Date: 3 September 2014

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