

Equality Impact Analysis: (EqIA)

Section 1: Introduction

Name of Proposal: Revised approach to day support in adult social care
For the purpose of this document, 'proposal' refers to a policy, function, strategy or project)

Service area & Directorate responsible: Health, Adult and Community Services Directorate. Jointly held across adult social care and integrated commissioning.

Name of completing officer: Joanne Starkie, Head of Strategy and Policy for Health, Adults and Community services.

Approved by Director/Head of Service

Date of approval

Conclusion - To be completed at the end of the Equality Impact Assessment process

This summary will provide an update on the findings of the EIA and what the outcome is. *For example, based on the findings of the EIA, the proposal was rejected as the impact on a particular group was disproportionate and the appropriate mitigations in place. Or, based on the EIA, the proposal was amended and alternative steps taken)*

The Equality Analysis has identified risks associated with one or more of the nine groups of people who share a protected characteristic under the Equality Act 2010. However, this risk may be removed or reduced by implementing the actions detailed within the *Action Planning* section of this document.

See
Appendix A

Current
decision rating



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

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

Where a proposal is being taken to a Committee, please append the completed equality analysis to the cover report.

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

Section 2 – General information about the proposal

Provide a description of the proposal including the relevance of proposal to the general equality duties and protected characteristic pursuant to Equality Act 2010.

This Equality Analysis relates to an October 2020 report on a 'Revised Approach to Day Support in Adult Social Care'. Please see the report for more details on the proposal, aims and objectives of the report.

This Equality Analysis focuses on the impact of the proposed revised approach to day support on service users and carers.

Section 3 – Evidence (Consideration of Data and Information)

What evidence do we have which may help us think about the impacts or likely impacts on service users or staff?

The impact of the proposed options is on adult social care users and carers, and is described in the table in Section 6. The evidence is taken from two main sources:

- Framework-I (the predecessor to Mosaic), which holds information on the protected characteristics of adult social users and carers in community-based services. This includes service users attending day support as well as service users who receive homecare and other forms of community-based support.
- Information directly from day services on the protected characteristics of service users registered to attend Pritchard's Road Day Service, Physical Disability (PD) Day Opportunities and Riverside Day Service.

The impact of the proposed options is described on the table below.

Overall, the equality profile of adult social care users in community-based services is different to the profile of Tower Hamlets residents, as is the equality profile of carers in the borough. Tower Hamlets resident and carer information¹ is taken from the 2011 Census. Adult social care user information is taken from Framework-I as of June 2018.

Age

Adult social care users are – on average – older than the general population.

- 6.1% of the Tower Hamlets population are aged 65 or over. 74.1% are aged 16 to 64 years old.
- 61% of adult social care community-based service users are aged 60 or over.
- 8.6% of carers in Tower Hamlets are aged 65 or over.

Gender

Women are overrepresented in both the profile of adult social care users and carers compared to the general population.

- 48.5% of the Tower Hamlets population are women.
- 58% of adult social care community-based service users are women.
- 55% of carers in Tower Hamlets are women.

Ethnic background

The ethnic background of adult social care users and carers compared to the general population is different:

- 45% of the Tower Hamlets population are of a White ethnic background, the majority of which are White British (31% overall). 41% are of an Asian ethnic background, the majority of which are Bangladeshi (32% overall). 7% are of a Black ethnic background.
- 38% of adult social care community-based service users are of a White ethnic background. 38% are of an Asian ethnic background and 14% were of a Black ethnic background.

¹ It should be noted that the number of carers known to adult social care is much smaller than the number of carers overall.

- 33% of carers in Tower Hamlets are a White British ethnic background and 43% were of a Bangladeshi ethnic background.

Religion or belief

- 35% of the Tower Hamlets population are of a Muslim faith. 27% were of a Christian faith, and 19% reported no religion.
- 35% of all adult social care users are Christian, 31% are Muslim and 34% have another or no religious belief (please note that unlike the rest of the evidence, this evidence is based on Framework-I data as of January 2016).
- Information on the religion or belief of carers was not available to inform this analysis.

Disability

Disability is likely to be more prevalent for both adult social care users and carers compared to the general population.

- 6.8% of the Tower Hamlets population report a health problem or disability lasting for at least 12 months and limiting day to day activity.
- The nature of adult social care is such that a significant proportion of people are likely to consider themselves to have a disability. 64% of service users primarily need physical support. 21% primarily need support related to a learning disability. 11% primarily need support related to a mental health issue.
- Carers report worse health than the general population: 9% reported bad health compared to 6% overall.

Socio-economic status

There is no like-for-like information to provide a meaningful comparison between the socio-economic status of adult social care users and the Tower Hamlets population as a whole. However, there are some indications:

- 69.8% of Tower Hamlets residents are economically active.
- 57.6% of carers are economically active.

Sexual orientation

Information on sexual orientation is not available in sufficient detail to be able to draw any meaningful comparisons. Office of National Statistics (ONS) information from 2018 indicates that 94.6% of those aged 16 or over identify as heterosexual or straight whilst 2.2% identify as lesbian, gay or bisexual (LGB). The report notes that younger people, men and people in London were most likely to identify as LGB.

Gender reassignment, marriage and civil partnership and pregnancy and maternity

Information on gender reassignment, marriage and civil partnership and on pregnancy and maternity in relation to adult social care users and carers is not available in sufficient detail to be able to draw any meaningful comparisons. Given the age profile of adult social care users, it can be assumed that the proportion who are pregnant or those who fall under the 'maternity' characteristic is lower than the borough average.

Interdependencies

It is worth noting here that age, ethnic background and disability are linked for adult social care users in Tower Hamlets. Proportionately more older people are of a White ethnic background², and proportionately more younger people are of an Asian ethnic background. Proportionately more younger people have a learning disability or mental health issue, whereas there is a higher prevalence of physical disability in the older population.

Consultation

Details of previous engagement and planned future consultation is described in the report.

² 55% of 60-74 year olds were of a White British ethnic background in the 2011 Census, rising to 63% for those aged 75 or over. The figures for residents of a Bangladeshi ethnic background are 21% and 17% respectively.





Section 4 – Assessing the impacts on residents and service delivery

	Positive	Negative	Neutral	Considering the above information and evidence, describe the impact this proposal will have on the following groups?
Age (All age groups)	<p>Opportunity to shape support for older people around what they want.</p> <p>Opportunity for more intergenerational contact.</p>	<p>Some older service users who have attended for a number of years may not want change.</p> <p>Risk of less opportunity for people of the same age to come together and share experiences.</p>	<p>Proportionately more older people are impacted by the proposal.</p>	<p>Overall, people aged 55 to 64 years make up the biggest single age group attending Pritchard’s Road (23 members are this age) and PD Day Opportunities (7 members are this age). Everyone attending Riverside Day Service is over the age of 65. This is broken down further below:</p> <ul style="list-style-type: none"> - Pritchard’s Road: Of the 52 current members, 3 are under the age of 34. 41 are aged 45 or over. 23 are aged 55-64 years. - PD Day Opportunities: Based on the data of 17 attendees, 2 are under the age of 34. 14 are aged 45 or over. 7 are aged 55-64 years. - Riverside Day Service: Based on the data of 19 attendees, all are aged 65 or over. Ages range from 68 to 96 years. <p>Furthermore, the proposal has implications for commissioned day support and the future redesign of older people’s day support services. These are currently Sonali Gardens and the Sundial Centre.</p> <p>Overall, the proposal will have an impact on age in the following ways:</p> <ol style="list-style-type: none"> i. Proportionately more older people will be impacted by the change, given the profile described above. Changing the model will mean potential change to how services are arranged for older people. ii. The current model enables people of a similar age to spend time together. Moving to more of a community hub model may shift this to an extent, as the idea of a hub is for people – where possible – to get out and about in their communities more. iii. Provisional feedback from staff is that a traditional day centre model is an increasingly less attractive option for adults of working age coming into adult social care for the first time. iv. Conversely, a number of Pritchard’s Road service users have been attending services for a high number of years (i.e. more than 10) and have strong ties to the service and staff. It’s likely that the older members will have a preference for traditional building-based day services and could find service closure difficult to accept. v. Coproduction was carried out with older people who use older people’s day services (Riverside Day Centre, Sundial Centre, Sonali Gardens, Russia Lane) over summer 2020 and with adults with a physical disability (PD Day Opportunities). The initial findings from this are included in the report. The proposal to revise day support is largely aligned to these findings, providing an opportunity to shape support around what older people with social care needs want.
Disability (Physical,	<p>Opportunity to shape</p>	<p>Risk of less opportunity for</p>	<p>The proposed changes will</p>	<p>All those who attend Pritchard’s Road have mental health problems. All those who attend PD Day Opportunities and the Riverside Day Service have a disability. The nature of the service is such that it is highly likely that most or all service users in other in-house and commissioned day services consider</p>



<p>learning difficulties, mental health and medical conditions)</p>	<p>support for people with a disability around what they want.</p> <p>Opportunity to reduce disability discrimination and increase accessibility.</p>	<p>people with disabilities to come together and share experiences.</p> <p>Risk that a lack of accessible community facilities, disability discrimination and stigma will prevent people with disabilities making full use of a community hub.</p> <p>Risk that people with communication needs arising from disability will have difficulty engaging with the proposal.</p>	<p>have a disproportionate impact on people with a disability.</p>	<p>themselves to have a disability.</p> <p>Overall, the proposal could have an impact on people with a disability in the following ways:</p> <ol style="list-style-type: none"> i. Changing the model will mean change to how services are arranged for people with a disability. ii. The current model enables people with similar experiences based on disability or mental health issue to spend time together. Moving to more of a community hub model may shift this to an extent, as the idea of a hub is for people – where possible – to get out and about in their communities more. iii. There is a risk that people with a disability will not be able to benefit from the proposal to have community hubs as a base for accessing other activities and services in the community as a result of a lack of accessible facilities and transport. This includes a lack of accessible toilets and accessibility issues on public transport. The proposal includes a commitment to do more to promote accessible facilities. iv. There is a risk that people with a disability or mental health issue will not be able to fully benefit from the proposal to have community hubs as a base for accessing other activities and services in the community as a result of disability discrimination and mental health stigma. The proposal includes a commitment to tackle this. v. Some people may have communication needs arising from their disability that makes this proposal difficult to engage with. The consultation proposal includes an action to address this, in proposing that the consultation be discussed at review meetings between adult social care practitioners and service users. vi. The new model of day support can be shaped as a result of consultation with people with disabilities, providing an opportunity to shape support around what people with a disability who have social care needs want.
<p>Sex</p>		<p>Risk of an increased burden being placed on unpaid carers – a group where women are overrepresented.</p>		<p>In broad terms, the majority of service users who attend Pritchard’s Road and PD Day Opportunities are male and the majority of service users who attend Riverside Day Service are female. The picture for all in-house and commissioned services is likely to be variable. There are no sex-specific services.</p> <p>Overall, the proposal could have an impact on people’s sex in the following ways:</p> <ol style="list-style-type: none"> 1. Carers are more likely to be women. Day support often fulfils a dual function of both meeting the needs of a service user and providing carers with a break. There is a risk that the new model might result in changes to care packages that put an increased burden on unpaid carers. This can be mitigated against by offering carer needs assessment at the same time as planned reviews, so that both carer and service users needs can be looked at holistically.



Gender reassignment	<p>Opportunity to access a wider range of support that needs individual needs.</p>	<p>Risk that transphobia and stigma will prevent people of different genders making full use of a community hub.</p>	<p>One person identifies as transgendered in Pritchard’s Road, PD Day Opportunity and Riverside Day services. The remainder have the same gender identity that was assigned to them at birth.</p> <p>Overall, the proposal could have an impact on people who are a different gender to the gender assigned to them at birth in the following ways:</p> <ol style="list-style-type: none"> i. There is a risk that transgendered people will not be able to fully benefit from the proposal to have community hubs as a base for accessing other activities and services in the community as a result of transphobia and stigma. ii. The proposal is intended to provide people with more choice and ability to access community facilities.
Marriage and civil partnership			<p>Information on this is collected at PD Day Opportunities, where 8 service users are married and 9 are single.</p> <p>It is not anticipated that the proposal will have a disproportionately negative or positive impact as it relates to this characteristic.</p>
Religion or philosophical belief	<p>Increased opportunity for people of different faiths to come together.</p>	<p>Risk that community hubs / alternative provision is not inclusive for people of different faiths.</p>	<p>Information on this is collected at PD Day Opportunities, where 7 service users are of a Muslim faith and 4 are of a Christian faith, and at Riverside Day Services where all service users are of a Christian faith.</p> <p>Overall, the proposal could have an impact on people of different religions or beliefs in the following ways:</p> <ol style="list-style-type: none"> i. There is a risk that people with dietary requirements arising from their faith or belief (e.g. Halal) will not be able to fully benefit from the proposal to have community hubs, if these hubs do not provide appropriate food choices. This can be addressed in the design of the hubs. ii. The proposal should provide people of different faiths and beliefs with more opportunity to come together.
Race	<p>Increased opportunity for people of different ethnicities to come together.</p>	<p>Risk of language barriers being an issue in community hubs.</p>	<p>In broad terms, the majority of service users who attend Pritchard’s Road and PD Day Opportunities are from BAME communities and the majority of service users who attend Riverside Day Service are of a White ethnic background. This is broken down further below:</p> <ul style="list-style-type: none"> - Pritchard’s Road: Of the 52 current members, 56% are from BAME communities. 12 are of an Asian Bangladeshi ethnic background. 44% are of a White ethnic background. - PD Day Opportunities: Based on the information of 17 service users, 7 are of a Black ethnic background and 5 are of an Asian ethnic background. 3 are of a White ethnic background and 2 are of a Turkish ethnic background. - Riverside Day Service: Based on the information of 19 service users, 16 are of a White ethnic background <p>The ethnic background of people who use commissioned day support services is likely to be similarly</p>



				<p>diverse. There is currently one commissioned day support service – Sonali Gardens – that is targeted at people of an Asian Bangladeshi ethnic background.</p> <p>Overall, the proposal could have an impact on people of different religions or beliefs in the following ways:</p> <ul style="list-style-type: none"> i. The proposal may result in changes to Sonali Gardens (the report notes recommissioning of older people’s day services will start next year, with a new contract start date of January 2022) which will impact on service users of an Asian Bangladeshi ethnic background. ii. Initial findings from the coproduction exercise carried out with older people and people with physical disabilities who need day support is that there is a strong interest from all users to mix with people from different ethnicities, although language barriers remains a concern. The risk presented by language barriers could be addressed by ensuring that there are staff who speak community languages who can help facilitate communication.
Sexual orientation	Opportunity to access a wider range of support that needs individual needs.	Risk that homophobia will prevent people of different sexual orientations making full use of a community hub.		<p>Information on this is collected at PD Day Opportunities, where all service users identify as heterosexual, and at Riverside Day Services where one service user has not disclosed this information and the remainder identify as heterosexual.</p> <p>Overall, the proposal could have an impact on people who are gay, lesbian or bisexual in the following ways:</p> <ul style="list-style-type: none"> i. There is a risk that gay, lesbian or bisexual people will not be able to fully benefit from the proposal to have community hubs as a base for accessing other activities and services in the community as a result of homophobia. ii. The proposal is intended to provide people with more choice and ability to access community facilities. For example, no specific LGBT+ groups are run at day support services at present, and the new proposal may support people who want to, to access this elsewhere.
Pregnancy and maternity				<p>No service users at Pritchard’s Road, PD Day Opportunities or Riverside Day Service are pregnant or on maternity leave. Given the age profile described earlier, this is unlikely to change for the majority of service users.</p> <p>It is not anticipated that the proposal will have a disproportionately negative or positive impact as it relates to this characteristic.</p>

Other				
Socio-				It is not anticipated that the proposal will have a disproportionately negative or positive impact on this. All community provision for adults with support needs under the 2014 Care Act is subject to financial



economic				assessment, in line with the Charging Policy in adult social care.
Parents/ Carers				Please see previous section on sex / impact on women carers.
People with different Gender Identities e.g. Gender fluid, Non- Binary etc				It is not anticipated that the proposal will have a disproportionately negative or positive impact as it relates to gender identities.
AOB				

Section 5 – Impact Analysis and Action Plan



Recommendation	Key activity	Progress milestones including target dates for either completion or progress	Officer responsible	Progress
1. Address the risk that some older service users who have attended services for a number of years may not want change / may find change difficult	<ul style="list-style-type: none"> - Coproduction, consultation and reviews to be carried out, to shape alternative support around what people want - Support through change provided by staff 	To be completed following 28 th October 2020 Cabinet	To be completed following 28 th October 2020 Cabinet	To be completed following 28 th October 2020 Cabinet
2. Address the risk that the model will result in fewer opportunities for older people and people with disabilities or mental health issues to come together and share experiences	<ul style="list-style-type: none"> - Coproduction, consultation and reviews to be carried out, to shape alternative support around what people want - Ensure the new model maintains opportunities for people to come together and share experiences 	As above	As above	As above
3. Address the risk that a lack of accessible community facilities, disability discrimination and stigma will prevent people with disabilities making full use of a community hub.	<ul style="list-style-type: none"> - Identify accessible facilities in the borough and where they are needed - Explore whether there is a need to adapt toilet facilities in existing provision to ensure accessibility - Agree and carry out actions to tackle stigma and discrimination 	As above	As above	As above
4. Address the risk that people with communication needs arising from disability will have difficulty engaging with the proposal.	<ul style="list-style-type: none"> - Ensure communication and consultation materials are provided in an accessible format. - Practitioners to support service users to engage with the consultation in review meetings 	As above	As above	As above
5. Address the risk of an increased burden being placed on unpaid carers – a group where women are overrepresented.	<ul style="list-style-type: none"> - Carer needs assessments to be offered during service user reviews - To engage with Carer Centre on proposals 	As above	As above	As above
6. Address the risk that transphobia or homophobia might prevent people of different genders making full use of a community hub.	<ul style="list-style-type: none"> - Identify any targeted support people may want to access - Link in with Council-wide actions to tackle homophobia & 	As above	As above	As above



	transphobia (e.g. 'No Place for Hate') <ul style="list-style-type: none">- Work with service users and stakeholder to ensure new model is inclusive.			
7. Address the risk of the new day support model not being inclusive for people of different faiths.	<ul style="list-style-type: none">- Ensure new model meets dietary requirement of people of different faiths- Work with service users of different faiths to ensure new model is inclusive.	As above	As above	As above
8. Address the risk of language barriers being an issue in the revised day support model.	<ul style="list-style-type: none">- Ensure new model includes staff who speak key community languages- Work with service users of different ethnicities to ensure new model is inclusive.	As above	As above	As above



Section 6 – Monitoring

Have monitoring processes been put in place to check the delivery of the above action plan and impact on equality groups?

Yes?




No?

Describe how this will be undertaken:

This will be put in place following 28th October 2020 Cabinet decision.

Appendix A

Equality Impact Assessment Decision Rating

Decision	Action	Risk
<p>As a result of performing the EIA, it is evident that a disproportionately negative impact (direct, indirect, unintentional or otherwise) exists to one or more of the nine groups of people who share a Protected Characteristic under the Equality Act. It is recommended that this proposal be suspended until further work is undertaken.</p>	<p>Suspend – Further Work Required</p>	<p>Red</p> 
<p>As a result of performing the EIA, it is evident that there is a risk that a disproportionately negative impact (direct, indirect, unintentional or otherwise) exists to one or more of the nine groups of people who share a protected characteristic under the Equality Act 2010. However, there is a genuine determining reason that could legitimise or justify the use of this policy.</p>	<p>Further (specialist) advice should be taken</p>	<p>Red Amber</p> 
<p>As a result of performing the EIA, it is evident that there is a risk that a disproportionately negatively impact (as described above) exists to one or more of the nine groups of people who share a protected characteristic under the Equality Act 2010. However, this risk may be removed or reduced by implementing the actions detailed within the <i>Action Planning</i> section of this document.</p>	<p>Proceed pending agreement of mitigating action</p>	<p>Amber</p> 
<p>As a result of performing the EIA, the proposal does not appear to have any disproportionate impact on people who share a protected characteristic and no further actions are recommended at this stage.</p>	<p>Proceed with implementation</p>	<p>Green:</p> 