

Equality Impact Assessment

The Public Sector Equality Duty which is set out in the Equality Act 2010 requires public authorities to have due regard to the need to:

- Eliminate unlawful discrimination, harassment and victimisation.
- Advance equality of opportunity between people who share a protected characteristic and those who do not.
- Foster good relations between people who share a protected characteristic and those who do not.

Protected characteristics are: age, disability, gender reassignment, pregnancy and maternity, race (this includes ethnic or national origins, colour or nationality), religion or belief (this includes lack of belief), gender and sexual orientation.

The purpose of carrying out an Equality Impact Assessment is to assess the impact of a change to services or policy on people with protected characteristics and to demonstrate that the Council has considered the aims of the Equality Duty.

The Equality Duty must be complied with before and at the time that a change to services or particular policy is under consideration or decision is taken. A public body cannot satisfy the Equality Duty by justifying a decision after it has been taken.

Please write in Plain English as this document, once approved, will be published on the Council's website.

Title	
Equality Impact Assessment on the proposed £10m reduction in the Supporting People budget.	
Start Date	21.01.11
Updated	5.05.11
Lead Officer for this assessment	Lyn Farrow Programme Manager, Supporting People Adult Social Care and Health & Public Protection
List of other officers involved	Allyson Rees, Paula McManus, Lyn Farrow, Margaret Radford, Maggie Else, Pete McGavin, Jayne Francis-Ward

1a.	What is being considered (include rationale where appropriate)?
<p>This Equality Impact Assessment (EqIA) was originally prepared as part of the process of developing proposals for the reduction in the size of the Supporting People programme and was intended to be read in conjunction with the following documents:</p> <ul style="list-style-type: none">• Supporting People Consultation paper on savings of £10 million• Supporting People summary table• Supporting People Service Details table• Nottinghamshire County Council Cabinet report dated 21st October 2010 <p>This EqIA has now been reviewed and updated and can be read in conjunction with the following documents:</p> <ul style="list-style-type: none">• Nottinghamshire County Council report dated 19th May 2011• Supporting People Revised Service Details <p>Background to Supporting People in Nottinghamshire</p> <p>Nottinghamshire County Council is required to save £150 million over the next three years. This saving includes a £67.6 million reinvestment in services for vulnerable adults and children. For Adults this will mean an additional £44.8 million over 4 years including the provision of essential care services to more adults with disabilities and an extra 4,000 older people over the age of 65 each year in Nottinghamshire.</p>	

Supporting People in Nottinghamshire is a discretionary programme that helps vulnerable people to live independently in their own accommodation or move from temporary accommodation into a more permanent place.

The programme supports the following client groups:

- People with drug/alcohol misuse problems
- Women at risk of domestic violence
- Homeless people
- People with learning disabilities
- People with mental health problems
- Offenders and people at risk of offending
- Older people
- People with physical or sensory disability
- Gypsies and Travellers
- Young People (including care leavers and teenage parents)

The Nottinghamshire programme currently supports 14,259 individuals or households. Annually the programme supports approximately 16,000. The programme funds a mixture of short (less than 2 years) and long-term services. Some services are provided in supported accommodation such as temporary accommodation for homeless people, women's refuges or sheltered housing. Others are provided to people in their own homes. This is also known as 'floating support'.

Savings Proposal

In 2010/11, funding to the County Council for the Supporting People programme was £22.5 million. The savings proposed will reduce the overall budget to £12.5 million over the next 4 years. This includes a 60% reduction in associated staffing and administration costs to reflect both the programme reduction and more efficient ways of working.

The proposals for how expenditure on services would be reduced is based on the principles set out below, but adjusted where it is recognised that there is a need to retain staffing at levels in core accommodation services at levels which are both safe and can deliver outcomes for service users.

The principles which guide the prioritisation of future Supporting People funding and activities are:

- To target funding at the most vulnerable and those at greatest risk ;
- To maximise value for money including review of provider overhead and transactional cost ;
- To minimise the impact on high cost statutory services ;
- To ensure an appropriate geographic spread of services according to need ;
- To ensure that accommodation-based services are not closed and floating support services are retained but at reduced capacity and cost ;
- To ensure that all targeted client groups have access to services ;
- To reconfigure the procurement of services for different client groups where appropriate to achieve economies of scale ;
- To agree clear and measurable outcomes for all funded services ;
- To encourage greater volunteering and shared responsibility for care.

The proposals set out plans that would:

- Reduce funding by 50-70% across all floating support services (i.e. services that provide visiting support to people living in their own homes);
- Reduce funding, by 30-50% for most accommodation based services such as homelessness services, women's refuges and supported housing for teenage parents;
- Withdraw funding from sheltered housing and alarm services for older people and use the available resources to fund an outreach support service targeted at
- Close a number of services, including Stepping Stones service for young people in Broxtowe, a Kirkby Trust service for young people in Ashfield, Hope House, a homelessness direct access service in Worksop and Travelling Together, a floating support service for Gypsies and Travellers;
- Remodel and tender mental health accommodation services;

- Identify savings through the joint Supporting People and Adult Social Care and Health & Public Protection contracts for services for people with learning disabilities.

(The full details can be found at <http://www.nottssupportingpeople.org.uk/>)

Based on this, a second, more detailed consultation exercise took place between 1st February 2011 and 28th March 2011. Following this exercise responses and feedback were considered and a number of changes have been made to the proposals being put forward to the Council at the meeting on 30th June 2011.

The changes include:

- Maintaining 2011-12 funding for Stepping Stones and Kirkby Trust services through working with Children, Families and Cultural Service to achieve more strategically planned and better integrated services;
- Maintaining 50% of 2011-12 funding for Travelling Together, the floating support service for Gypsies and Travellers, prior to the integration of this service with other floating support services from April 2012.

The full details are will be available from the County Council website from 22nd June 2011.

1b. Consider whether all service users are affected equally:

(i) Are there any adverse or negative impacts on people with protected characteristics? Give details and justification below:

Protected characteristics: age, disability, gender reassignment, pregnancy and maternity, race (includes ethnic or national origins, colour or nationality), religion or belief (includes lack of belief), sex and sexual orientation.

Age:

It is recognised that the Supporting People programme reduction will impact on both older people, who currently make up around 80% of service users in the programme, young people, who are supported within the programme through services specifically for 16-25 years olds and children who are impacted by services for families.

Older People

The proposals include the cessation of funding for all older people's accommodation support (sheltered housing wardens/support services) and all emergency alarms (both those provided as an integral part of accommodation and dispersed alarms) at 31st March 2013. The funding that will continue for older people's services will be used for an Older People's Outreach Support Service. This would be provided on a short term basis to people meeting an assessed need. As a result around 11 500 older people would lose the service that they currently receive and around 1150, potentially all different, people would receive the new service at any point in time (or around 3,500 per year) but on a temporary basis. The proposals therefore represent a significant impact on older people.

The rationale for this proposal is that current services have not traditionally been targeted at people on the basis of their need for a support service and there are therefore a large number of service users who do not need the service provided. Some of these also prefer not to receive it. A survey of providers carried out in Autumn 2007 found that around 50% of service users had no/low need.

There is little scope to reduce the cost of existing services. The options for achieving the savings required must therefore involve either:

- i) reducing the number of services providing the same style of service as is provided at present; or
- ii) changing the way in which services are provided in order to target resources where they can be most effective.

Option i) was rejected on the grounds that it would still direct funds at services where some users had little/no need for the service.

In developing the proposal for this area of service, the Council was mindful of the scale of this discretionary area of service and of the safety net that exists through its statutory obligation to assess the needs of any older person identified as struggling with their independence and ensure that services are put in place accordingly.

The new Supporting People funded service would align with other prevention work within the department to deliver a co-ordinated prevention approach.

Young People:

In 2010/11 around £2.7m was spent on services for 16-25 year olds in need of housing and/or housing support and £259k on services to support teenage parents. Young people also access the full range of other Supporting People funded services and in 2009/10 175 new entrants to Supporting People funded services were aged 16 or 17 (this figure will double count people who move from one service to another during the year).

The proposals did identify a number of services for closure during 2011/12 but there have been on-going discussions with Children, Families and Cultural Services about young people's services and authority's statutory duty towards homeless 16 and 17 year olds. These discussions have resulted in an agreement that CFCS will maintain the funding for these services during 2011/12 whilst work continues to develop a strategy for youth homelessness and set out the services that will be required in future.

Other services that affect children and young people include domestic violence refuges, homeless family provision, teenage parent services and floating support provided to families. All refuge and teenage parent provision will be retained but with a reduction in funding. The funding for two services accommodating and supporting homeless families will cease and floating support services will be reduced.

In developing the proposal to remove funding from the two homeless family services, the Council:

- has reflected an intention of Rushcliffe BC to meet its statutory duty towards homes families through other provision not financially supported through the Supporting People programme (NB. Supporting People previously only made a minor contribution to the cost of the service);
- wanted to take more a consistent and equitable approach in respect of the funding of homeless family accommodation services in the county. In all district/boroughs other than Mansfield, the housing authority would be meeting the cost of accommodation based support services to homeless families.

Mitigating this identified impact, homeless families, including those in temporary accommodation, will continue to have access to floating support services as well as support services available through other agencies, e.g. Sure Start and community groups.

Disability:

It is recognised that the Supporting People programme reduction is likely to impact on people with physical disabilities. Whilst the programme reduction proposals aim to limit the impact on services aimed specifically at people with physical disabilities, learning disabilities and mental health problems, people with disabilities access the full range of Supporting People services.

Of the 3,873 people entering all Supporting People services during 2009/10:

Total number identifying a disability on service entry	Mobility	Visual Impairment	Hearing Impairment	Progressive Disability/Chronic Illness (e.g. MS/cancer)	Mental Health	LD	Other	Disability: does not wish to disclose
1,142	288	58	54	56	706	204	62	20

(NB. Some individuals identified more than one category of disability. This data does not include the majority of service users who were already in a service in April 2009 but provide an indication of the profile of service users.)

As part of this proposal there will be a 50% reduction in funding for the Deaf Floating Support service. This has been proposed in line with similar reductions across floating support services. Every effort will be made to ensure that savings are delivered through efficiencies, thus limiting the impact on service delivery.

Gender reassignment:

No data was available to assess impact based on this characteristic, but no services particularly target people with this protected characteristic and therefore limited or no impact is anticipated.

Pregnancy and maternity:

Funding to services for teenage parents will be reduced by 50% from April 2012. This will allow all three services to be retained but the young women who receive services may receive a lower level of support from their Supporting People funded service. However this will be mitigated by continued access to support through mainstream services such as the health visitor service.

Race:

Of the people who entered Supporting People services during 2009/10:

	All groups	White British	White Irish	White Other	Mixed	Non-white British	Other	Gypsy/ Romany/ Irish Traveller
SP users	3873	3596	18	73	35	80	7	42
%	100	92.8	0.5	1.9	0.9	2.1	0.2	1.1
Comparison data for Notts (to nearest '00)	288,700	218,900	3,200	11,600	9,500	45,400		-
%	100	75.8	1.1	4.0	3.3	15.8		Not separately identified

Data sources:

1. Centre for Housing Research - new client record form data for Nottinghamshire, 2009-10
2. Estimated Resident population by ethnic group, mid-2007 (experimental statistics) - Office for National Statistics crown copyright 2009

This baseline data shows that, with the likely exception of those from Gypsy, Romany and Irish Traveller communities, minority ethnic groups (black & white) are under-represented within Supporting People funded services. It is not clear whether this because they experience barriers to accessing services or because their needs are met in different ways, but it is recognised that if there are access barriers for people from minority ethnic groups then service reductions will further impact in respect of access difficulties.

During 2009/10 the Supporting People Quality Assessment Framework (QAF) was updated. Since the introduction on the refreshed QAF service providers are required to develop Equalities Action Plans which should include:

- collecting equalities data on successful and unsuccessful applications and exits from the service, and
- reviewing the equalities data, setting targets to address gaps or weaknesses and monitoring performance against these.

From June 2011 validation of achievement of this quality standard will commence and baseline data will continue to be monitored to assess whether this requirement on providers impacts positively on access to services for people from minority ethnic groups or whether further actions are required to address access barriers.

Information collected for the purposes of strategic reviews of different areas of service provision in the past has informed commissioning decisions to date and has not identified specific pockets of demand for particular services from particular minority ethnic communities (which might be expected in more urban or ethnically diverse areas), other than from the Gypsy and Traveller service discussed below. No individual services have therefore been considered from this perspective other than the service aimed at Gypsies and Travellers.

One service is aimed at people from a specific minority ethnic group – the Travelling Together service that supports people from the Gypsy and Traveller communities across the county. That service was proposed for closure during 2011/12 but with an intention to specify the requirement to address the needs of this group through the generic floating support service. This proposal has been reviewed and amended to now 'reduce' funding during 2011/12 and then specify the requirement to address the needs of this group through the generic floating support service that will commence from April 11. This will allow some continuity of service, thus maintaining the links with the communities that the service supports.

It is acknowledged and accepted that the service reduction will impact on the number of Gypsies and Travellers who might receive a service, however this will be limited by maximising the savings delivered through efficiencies and by reducing overheads from April 2012, when the service will be integrated within the generic floating support service.

Religion or belief:

Of the 3873 people entering Supporting People services during 2009/10, 639 people identified themselves as having a religion (16.5%), with 65 (1.7%) of these having a non-Christian religion.

It is not anticipated that people with religion/beliefs will be disproportionately impacted by these proposals. All commissioned services will continue to be required to recognise the needs of different faith based observances and practices and identify support needed for service users to access religious and faith based groups and services through the support planning process.

Sex:

It is recognised that the Supporting People programme reduction will impact on women receiving or wishing to access services. In particular, there are a number of services that are aimed specifically at women with specific support needs:

Women at risk of domestic violence

As a consequence of feedback received through the first round of consultation, it is now proposed that all women's refuges be retained. This will allow access to safe refuge to be maintained, although users of these services will receive a reduced level of support within services.

Women with drug/alcohol misuse problems

It is recognised that a specific group of women will be affected by the proposal to decommission a specialist women only drug service.

Whilst it is recognised that this unique service delivers benefit to those who use it, the County Council was mindful of on-going concerns about the limited use of this service by women from Nottinghamshire. Given the significant budget reduction to be delivered against Supporting People services, it is therefore difficult to justify continued investment in a service yielding limited local benefit. The identified impact is mitigated by women from Nottinghamshire, who may have previously accessed the service, continuing to be able to access other retained drug support services.

Sexual orientation:

No data was available to assess any impact, based on this characteristic, likely to arise as a consequence of these proposals.

(ii) Are there any positive impacts on people with the above protected characteristics? Give details below:

As a consequence of further drives to get better value and make every pound deliver the most effective outcome, there are mechanisms through which the Supporting People savings will be delivered that could impact positively on people with protected characteristics:

Age:

Older People

As a consequence of changing the way that support services are provided to older people, that new services will be equally accessible to older people in all types of housing (rather than, as currently, being focussed of those living in a sheltered housing environment). This will enable more older people to remain in their homes.

Through pulling together Supporting People funding with other streams of funding and working together with others, including the health sector, on developing early intervention services, there is the potential to develop much more effective services with a reduction in overlap between services.

Young People

Through closer working with Children, Families and Cultural Services an opportunity is now being explored for better joint working. The development of a strategy for youth homelessness will be led by CFCS will drive the development of commissioning plans for supported accommodation and other support services for 2012/13 onwards based on a forecast assessment of need and spend and a broad strategic intention to move resource allocation towards homelessness prevention in line with the County Council's stated support for earlier intervention activities. A new integrated service will then bring together a range of previously disparate support services for vulnerable young people (re youth offending, youth homelessness, SP, children's social care etc) to ensure that their needs can be met from a single point of access.

Disability:

Scrutiny of services used by people with, in particular, physical disabilities and mental health problems, has meant that some services will be commissioned in future in a way that closely reflect individual need.

Sex:

Consideration is still being given to whether there is a need for gender specific mental health accommodation based services. This would involve creating designations that don't currently exist in order to meet a specific need.

2a. Give details (including feedback) of any consultation that has taken place/or is planned with service users.

On 21st October 2010, Nottinghamshire County Council launched a 3 month consultation on a general proposal for potential savings to the Supporting People budget. This initial consultation contained options for either a £10m, £12.5m or £15m reduction in the Supporting people budget over the next 4 years.

Nottinghamshire residents and employees were given the opportunity to comment on these proposals via the on-line form on the public website, Big Issues website, telephoning the Customer Service Centre where advisors have taken down comments over the phone, writing in using freepost address, and completing the paper form in County News or sent in using the freepost address. Service users were also able to attend a number of service user forum events that were held across the county.

The Supporting People service review proposals received a significant consultation response from the public, from partner organisations and from providers of services. In addition to over 3500 replies to the consultation questions on the Council's website, almost 4000 people signed petitions, over 200 people attended service user meetings and the Council received 482 letters and e-mails from organisations and members of the public. Many meetings were held with stakeholders, including a meeting with faith representatives including four of the county's Bishops.

Following considered feedback from the initial consultation, the County Council proposed to maintain the programme with a minimum reduction in year one and a phased reduction for years two, three and four resulting in the lowest possible option of a £10m reduction over the 4 year period. A second period of consultation was held from 1 February 2011 until 28 March 2011, based on details of how that minimum proposed budget saving of £10m would be delivered.

A detailed consultation document was published and circulated to all interested stakeholders. Further meetings were held with key partners and providers and where alternative proposals were put forward then these were explored. Again, there was opportunity to comment on the proposals via the Councils website, the Customer Services Centre, email and freepost.

The second phase of consultation on these detailed proposals also elicited a significant response from the public, partner organisations and service providers. A total of 1,954 people responded of which 37% were older people or their family members. There were 51 responses to the online questionnaire, petitions were handed in signed by 1,634 people, 91 people attended service user consultation meetings and 178 direct e-mails and letters were received.

There was some overlap in the concerns expressed through both consultation exercises with the second round also producing more specific concerns in relation to individual services. The feedback included:

- concern from older people about the loss of wardens and alarm services;
- concern from district & borough councils about the impact of the reductions on homelessness and vulnerable older people;
- concern about the proposed closure of specific service services (Stepping Stones, Kirkby Trust, Hope House, Travelling Together);
- concern about the viability of services at the proposed reduced level (NCHA, New Roots, Jigsaw).

These concerns have been taken into account in putting together the final proposals that will be considered by Council on 30th June 2011.

3a. What is the profile of your current staff by age group, disability, gender, race and ethnicity, religion or belief, sexual orientation?

3b. Give details of how the proposed service changes (if applicable) will affect staff? Will staff in any particular equality group be affected more than any other?

This savings proposal includes a reduction in the staff numbers employed by the County Council in administering the programme. This reduction will be based on numbers reducing from 13 to 5, but will be delivered as part of a broader restructure that will integrate the administration of the programme with the ASCH&PP department and deliver a slimmed down structure across both the department and Council as a whole.

4 people have taken voluntary redundancy (1 male 50+, 3 female, one of whom 50+)
 1 person has been made compulsorily redundant (male)
 3 people have been matched to temporary posts in place of permanent position (all female)
 All other staff have been integrated into the new structures of the County Council

The Human Resources (HR) policies that were applied to staffing reductions have been the subject of

Equality Impact Assessments independent to this EqIA. This includes assessments on the following relevant HR policies:

- Enabling process
- Redundancy process
- Redundancy selection criteria
- Selection and recruitment process
- Re-deployment process

These independent HR related EqIAs contain current staff profile information and are available at the Council's public website:

<http://www.nottinghamshire.gov.uk/home/newshome/servicereviews/equalityimpactassessment.htm>

These will be reviewed at an appropriate point in the future. For example, the EqIA on the *Enabling Process for Populating the new County Council Structure* is to be reviewed in May 2011, when all enabling processes are complete and new structures are in place.

A much bigger impact will be felt among staff employed by the organisations which hold contracts for the delivery of Supporting People funded services. The Supporting People programme funds approximately 180 FTE posts within these organisations and the impact of budget reductions to services will be managed by those providers in accordance with their own policies and overall business needs. The profile of these staff is not known.

4a.	What is your action plan to reduce or remove any adverse impacts identified in the above sections?
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The Council is mindful that there will be existing and future service users who will no longer be able to access services which are currently available to them or might have been available in the future. Service users with the highest needs will continue to receive services if they meet the appropriate eligibility criteria for adults or children's services. Wherever possible the Council has tried to maximise the use of available funding to ensure that as many people as possible can access services.

Other specific actions and approaches that have been used/will be used to address impacts identified through this assessment include:

- A more integrated approach around the commissioning of services for older people should ensure the most effective use of the total available resources in respect of preventative service and services should be better targeted where they are most needed.
- Better integration of services for vulnerable young people should benefit this group in terms of access to services and outcomes from services in the medium term, but with almost immediate effect, through the identification of additional resources, a significant number of services young people will not see the service that they are using impacted while further strategic work is carried out.
- Funding has been identified to allow the Travelling Together service to continue at a reduced level until April 2012, when the needs of this group will be supported through the multi-disciplinary floating support services.

4b.	How can this be measured/evaluated?
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- Analysis of any complaints, comments, suggestions from the customer relations service reports relating to this service going forward ;
- Performance reports from front line workers to determine whether there has been any adverse impact disaggregated against protected characteristics;
- Analysis of new client record data submitted by providers to the Centre for Housing Research

5a.	Date of Next Review:
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November 2011

5b.	If review is not required, explain why.
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6a.	EqIA Document History
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Date:	Detail:
23.11.10	Group impact assessment developed in respect of 'Reduction in Funding to External Bodies
21.01.11	New assessment completed specifically in relation to the Supporting People savings and efficiencies proposals
05.05.11	EqIA updated following consideration of feedback received through consultation exercise

6b.	Decision Log
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Date:	Detail:
21.10.10	Full Council consider initial proposals for NCC savings and efficiencies programme.
9.12.10	Council budget meeting
Dec 10	Detailed discussions held with portfolio holders, leader and other key cabinet members regarding the Supporting People programme, funded services and the impact of budget reductions.
21.01.11	Decision announced to carry out 2 nd round of consultation on detailed proposals
01.02.11 – 28.03.11	Consultation period
16.03.11	EqIA QA Group consider EqIA
30.03.11	Meeting with portfolio holders to discuss consultation feedback, EqIA and possible amendments to the proposals
27.04.11	Meeting between Corporate Director and portfolio holders re draft Council Report
06.05.11	EqIA QA Group consider updated EqIA