

Budget Proposals 2014/15 and 2015/16: Equality Impact Assessment (EIA):

Business Unit:	Supporting People	Directorate:	Adults & Resources
Date Started :	30th July 2013	Date of current version:	6th February 2014

The council and its partners are facing a significant challenge in the savings it needs to make over the next couple of years. This Equality Impact Assessment (EIA) has been developed as a tool to enable business units to fully consider the impact of their proposals on the community. As a council we need to ensure that we are able to deliver the savings that we need to make while mitigating against any negative or adverse impacts on particular groups across our communities.

This EIA will evidence that the Council have fully considered the impact of the proposed changes and has carried out appropriate consultation on those changes with the key stakeholders. This EIA and the evidence provided within it will allow Councillors to make informed decisions as part of the decision-making process regarding the council's budget.

Executive Lead / Head Sign off :

Executive Lead(s)	Cllr Christine Scouler	Executive Head:	Fran Mason
Date:	6th February 2014	Date:	6th February 2014

Summary from Overall Budget Proposals:

Proposals – Outline	Savings for 2014/15 and 2015/16		Implementation Cost <i>Include brief outline + year incurred</i>	Delivery <i>When will this proposal realise income / savings</i>	Risks / impact of proposals <ul style="list-style-type: none"> • <i>Potential risks</i> • <i>Impact on community</i> • <i>Knock on impact to other agencies</i> • <i>If statutory service please state relevant legislation section and Act together with any statutory guidance issued.</i> 	Type of decision		
	Income £ 000's	Budget reduction £ 000's				Internal	Minor	Major
<p>Leonard Stocks Centre : Assessment, engagement and referral centre for homeless people with complex needs including poor mental and physical health. Includes outreach support for rough sleepers (24 units of accommodation) All residents have an assessed local connection.</p> <p>The current budget for this service is £305,662.50 per annum.</p> <p>The proposal is to reduce the budget by 50% to approximately £153,000 per annum.</p>		£153,000 reduction		April 2014	<ul style="list-style-type: none"> • Contract expires April 2014 • This service provides the main source of emergency accommodation for single priority homeless in line with council's statutory housing duty. • Consultation and Equality Impact Assessment undertaken to assess the impact of the proposal. 			X

Section 1: Purpose of the proposal/strategy/decision

No	Question	Details
1.	<p>Clearly set out the proposal and what is the intended outcome.</p>	<p>The Leonard Stocks centre is an Engagement and Resettlement service based at Factory Row in Torquay. It houses and supports 24 homeless individuals at any time. The service is run by Chapter One, in partnership with the Shekinah Mission. The contract was awarded in July 2009 and has been extended to April 2014. The service works with people to address the issues that led them to homelessness. People using the service often have complex needs, such as drug or alcohol dependency, offending histories and mental health issues, and are often entrenched in homelessness. There are staff on site 24 hours a day, 7 days a week. Some people move from Leonard Stocks into their own accommodation, and some have moved on to more specialist services, such as Jatis, the Supporting People funded drug and alcohol service. Leonard Stocks is also used by Torbay Council's Housing Services to house some of the people to whom the Council has a duty under Housing legislation. A snapshot view of the week beginning 14th October 2013, shows that Housing Services had 6 people who they had a duty to, under Housing legislation, placed at Leonard Stocks (National costs for emergency accommodation is £336 a week¹). In addition, Severe Weather Watch (formerly Winter Watch), which gives overnight accommodation to anyone who is street homeless in adverse weather, to help prevent deaths, is run from Leonard Stocks. The Governments' 'No Second Night Out' scheme (which aims to prevent anyone spending a second night being street homeless) is also run from Leonard Stocks.</p> <p>The proposal is to reduce the funding to the Leonard Stocks centre by 50%, from its current value of £305,662.50 to approximately £153,000 per annum.</p>
2.	<p>Who is intended to benefit / who will be affected?</p>	<p>Initial discussions with the provider have indicated that if the funding for Leonard Stocks was reduced by 50%, they would be unable to work with individuals with complex needs. This is because the current level of funding is required to fund the amount of staff needed to run the service safely whilst working with people with complex needs. In addition, it is likely that the capacity of the service would reduce.</p> <ul style="list-style-type: none"> • Reduction in capacity of Leonard Stocks, and changes so that the service could no longer work with people with complex needs, could impact on individuals. The waiting list for the Leonard Stocks Centre on the 11th

¹ Supporting People Financial benefits Realisation Tool, Cap Gemini. The tool adds inflation to the figures

No	Question	Details
		<p>November 2013, is 25 people. There is no other service in Torbay that works with people who are street homeless and/or have complex needs. These individuals would therefore still have a need for accommodation and support to address their needs.</p> <ul style="list-style-type: none"> • If the capacity of Leonard Stocks were reduced, this will lead to longer waiting lists and longer waiting times to access the service. It is possible that this will have an impact on the health and wellbeing of the individual if they have to wait longer for accommodation and support, and it is possible that this will impact on the workload of Housing Services, as more people will be in contact with them awaiting accommodation. • If Leonard Stocks were unable to work with people with complex needs, these people could either present at the Council's Housing Services, or be 'sofa surfing' or street homeless. The Council would have a duty to some of these individuals and this would have an impact on the Housing Services budget, as they would have to pay for emergency accommodation for these individuals (National costs for emergency accommodation is £336 a week²). A snapshot view of the week beginning 14th October 2013, shows that Housing Services had 6 people who they had a duty to under Housing legislation, placed at Leonard Stocks) The Manager of Housing Services has indicated their view that it would be difficult to source emergency accommodation that would be willing to house some of the people with complex needs that they currently house at Leonard Stocks. • It is possible that there would be an increase in street homelessness if Leonard Stocks were not able to work with people with complex needs and there was a reduction in the capacity of the service. This is because the Council would only have a duty under Housing law to some of the people who are housed at Leonard Stocks. Without Leonard Stocks, it is possible that a proportion of people who the Council do not have a duty to, would become street homeless as there is no other service that works with this group. Figures for 2012/13 show that 74 of the 106 clients were rough sleepers (street homeless) when entering the service. • The impact of increased numbers of rough sleepers with complex needs such as drug and alcohol dependency, offending history and mental health issues would be: <ul style="list-style-type: none"> 1. Impact on individuals – people would not have the opportunity to be supported to address the issues that led to their homelessness, and they may not address these issues without support. This

² Supporting People Financial benefits Realisation Tool, Cap Gemini. The tool adds inflation to the figures

No	Question	Details
		<p>could lead to a deterioration in an individuals physical and mental health</p> <p>2. Impact on the wider community and visitors– An increase in people with complex needs who are street homeless could impact on the community due to more people being visible on the streets and a potential increase in fear of crime.</p> <ul style="list-style-type: none"> • If Leonard Stocks could no longer work with people with complex needs, it would not be able to run the ‘Severe Weather Watch’ scheme which provides shelter for anyone rough sleeping in severe weather with the aim of preventing deaths. • If Leonard Stocks could not work with people with complex needs, this could also impact on the delivery of the Governments ‘No second night out’ scheme which is currently run from Leonard Stocks and carries out outreach work to try to prevent anyone spending a second night rough sleeping. Even if the outreach work continued, workers would not be able to house people with complex needs at Leonard Stocks to prevent them spending a second night out.

Section 2: Equalities, Consultation and Engagement

Torbay Council has a moral obligation as well as a duty under the Equality Act 2010 to eliminate discrimination, promote good relations and advance equality of opportunity between people who share a protected characteristic and people who do not.

The **Equalities, Consultation and Engagement** section ensures that, as a council, we take into account the Public Sector Equality Duty at an early stage and provide evidence to ensure that we fully consider the impact of our decisions/proposals on the Torbay community.

Evidence, Consultation and Engagement

No	Question	Details
3.	Have you considered the available evidence?	

No	Question	Details																								
		<p>The service is geared towards short-term (13 week) intervention. 102 clients left the service in 2012/13- most (64) stayed for up to 13 weeks/ 3 months, 24 needed longer, staying for 3-6 months, and 14 for longer with 2 over 2 years.</p> <p>106 clients entered the service in 2012/13. The age breakdown is below</p> <table border="1" data-bbox="562 333 1375 624"> <thead> <tr> <th>Age</th> <th>Number of clients entering the service</th> </tr> </thead> <tbody> <tr> <td>18-30</td> <td>35</td> </tr> <tr> <td>31-40</td> <td>32</td> </tr> <tr> <td>41-50</td> <td>24</td> </tr> <tr> <td>51-60</td> <td>10</td> </tr> <tr> <td>61+</td> <td>5</td> </tr> <tr> <td>Total</td> <td>106</td> </tr> </tbody> </table> <p>There were 38% who were long term sick or disabled.</p> <p>74 of the 106 clients were rough sleepers when entering the service, 10 others had a primary need relating to offending and 14 others had a primary need relating to drug and/or alcohol misuse</p> <table border="1" data-bbox="562 884 1581 1075"> <thead> <tr> <th>Year</th> <th>Number of clients entering LSC</th> </tr> </thead> <tbody> <tr> <td>2009/10</td> <td>91</td> </tr> <tr> <td>2010/11</td> <td>121</td> </tr> <tr> <td>2011/12</td> <td>91</td> </tr> <tr> <td>2012/13</td> <td>106</td> </tr> </tbody> </table> <p>The service was 95.8% full in 2012/13 and 95% full in 2011/12 The reason that this is less than 100% is not due to lack of demand, but due to time between clients to clean and repair rooms.</p>	Age	Number of clients entering the service	18-30	35	31-40	32	41-50	24	51-60	10	61+	5	Total	106	Year	Number of clients entering LSC	2009/10	91	2010/11	121	2011/12	91	2012/13	106
Age	Number of clients entering the service																									
18-30	35																									
31-40	32																									
41-50	24																									
51-60	10																									
61+	5																									
Total	106																									
Year	Number of clients entering LSC																									
2009/10	91																									
2010/11	121																									
2011/12	91																									
2012/13	106																									
4.	How have you consulted on the proposal?	Providers of Supporting People funded services																								

No	Question	Details
		<p>The consultation period ran from Thursday 21 November 2013 to 16 January 2014</p> <p>On 21st November Providers were sent written details outlining the proposal(s) for their service(s) and given the Consultation Summary document detailing the overall proposals for the Supporting People (SP) programme, Equality Impact Assessments (EIAs) for their services and access to view the EIAs of other services online. Initial provider meetings/conversations were set up with SP Contract Managers in the week prior to the formal draft budget announcement. This was to explain the proposals and consultation process to providers and to allow the providers time to arrange meetings with their staff to take place on the day of the budget announcement (as for many services the proposals will affect staff)</p> <p>A client profile template was developed and sent to Providers to complete to identify clients in support services who were also in receipt of a statutory service. This information was used to inform the service EIAs and evidence where there might be an impact on the expenditure in other parts of the Authority.</p> <p>The Consultation Summary document and questionnaire were available on the Supporting People page of the Council's website.</p> <p>A follow up email was sent to Providers on 8th January asking if they were responding collectively, individually or both; and asking them to encourage referral agencies to respond to the consultation.</p> <p>Current and previous users of Supporting People funded services, and their carers, relatives and advocates.</p> <p>A standard letter outlining the specific proposals for each service was sent to the service provider to distribute to their service users. The letter outlined where service users could access and complete the client consultation questionnaire and explained the consultation process including the opportunity to attend focus groups or face to face interviews.</p> <p>Posters were sent to Providers to insert the details of the consultation events and promote these to service users.</p> <p>A number of focus groups proportionate to size of service were held for each of the affected services. Where services had more than 20 clients then 2 focus groups were offered, with the option for more if required, subject to the availability of resources to facilitate them. Focus groups used the same questions as the client questionnaire. However 1 focus group for clients in the supported employment service used different questions, chosen by by the external agency that facilitated this particular group.</p> <p>Focus groups were facilitated by representatives from Torbay Voice with a member of the SP team present to record comments. Where a focus group was organised but there were no attendees, the focus group has not</p>

No	Question	Details
		<p>been counted.</p> <p>Face to face interviews (with Torbay Voice representatives) or telephone interviews were offered to those choosing not to or unable to attend focus groups using the same questions.</p> <p>There may be a small duplication of respondents as some may have completed a questionnaire as well as attended a focus group</p> <p>Providers were encouraged to undertake their own consultations using the same questions, and some providers issued the questionnaires to their clients.</p> <p>The client questionnaire was available on the SP page of the Council's website and providers advised of this so that they could direct service users to it, or support service users to complete it themselves.</p> <p>Individual written submissions (email and letter) were received from service users, relatives, and family members.</p> <p>Stakeholders including statutory partners, referral agencies, local and national partner organisations An email was sent to all stakeholders attaching the SP Consultation Summary document and stakeholder questionnaire, a summary of SP services and a link to the EIAs for each service. Stakeholders were also encouraged to respond to the overall Council budget proposals and a link to the wider Council budget consultation was included in the email.</p> <p>Stakeholders included:</p> <ul style="list-style-type: none"> • Torbay and Southern Devon Health and Care NHS Trust • Devon Partnership Trust • Devon and Cornwall Probation Trust • South Devon Clinical Commissioning Group • Torbay Council Housing Services • Torbay Council Children's Services • Police • Referral agencies such as: Community Mental Health Teams, Disability Information Service, Housing Options team, Torbay Hospital

No	Question	Details
		<p>Other local and national partners such as: British Association of Supported Employment, Shelter, The Alzheimers Society, MIND and Mencap.</p> <p>See Appendix 1 for consultation results.</p> <p>Other including members of the public/non service users A general questionnaire was placed on the Council's website by the Council's Policy and Performance Team asking about all of the Council budget proposals including a section on Supporting People. The SP section contained a link to the SP consultation documentation on the specific budget proposals for SP services.</p> <p>Further representations were made in writing (via letter, email and petition) by organisations and members of the public.</p> <p>A total of 285 representations were received, as well as 21 focus groups that were facilitated for clients and carers, where 160 people attended.</p>
5.	Outline the key findings	<p>There were 12 responses received which referred to this proposal. This included a petition signed by 31 people. There were also 2 focus groups held for clients where 10 people attended.</p> <p>People at the focus groups spoke of how Leonard Stocks gave them an opportunity to have a roof over their heads and be warm and safe. People felt that it would be impossible to move on in life without somewhere to live, in this case provided by the service.</p> <p>Several people stated that they would have died if Leonard Stocks were not there as they would have continued in a downward spiral of drug use, homelessness, crime, and ill health. It was felt that there would be more people on the streets which would not only be detrimental to the people sleeping rough but on the whole community</p> <p>Financially, it was noted that failure to provide this sort of accommodation would have a knock on effect on offender management services, the prison service, police and hospitals. It was believed that all of these agencies would see an increased resource requirement, both in terms of cost and time.</p>

No	Question	Details
6.	What amendments may be required as a result of the consultation?	Provider organisation and Police, probation and health services request a delay in implementation of the proposals so that alternative sources of funding can be investigated.

Positive and Negative Equality Impacts

No	Question	Details		
7.	Identify the potential positive and negative impacts on specific groups			
		Positive Impact	Negative Impact	Neutral Impact
	Older or younger people			No differential impact
	People with caring responsibilities			No differential impact
	People with a disability		Leonard Stocks has rooms that are adapted to the needs of those with physical disabilities and therefore provides a means of housing people who are homeless and have a disability, which would not be available elsewhere. 38% of the clients entering the service in 2012/13 were long term sick or disabled.	
	Women or men			Figures for 2012/13 show that 89% of the people who used Leonard Stocks were men, but the service is available to both men and women
	People who are black or from a minority ethnic background (BME)			No differential impact
	Religion or belief (including lack of belief)			No differential impact
	People who are lesbian, gay			No differential impact

No	Question	Details	
	or bisexual		
	People who are transgendered		No differential impact
	People who are in a marriage or civil partnership		No differential impact
	Women who are pregnant / on maternity leave		No differential impact
	Socio-economic impacts (Including impact on child poverty issues and deprivation)		Impacts include increasing homelessness as many clients were rough sleepers prior to accessing Leonard Stocks (74 of 106 in 2012/13). Potential impact on crime as offenders use the service- and having accommodation is known to reduce re-offending ³ .
	Public Health impacts (How will your proposal impact on the general health of the population of Torbay)		Clients often have complex needs and are signposted by Leonard Stocks to GPs and specialist services such as mental health, drug treatment etc. The service promotes healthy and safe life choices to clients who often have chaotic lifestyles.
8a.	Cumulative Impacts – Council wide (proposed changes elsewhere which might worsen the impacts identified above)	<p>The main cumulative impact would be the impact on the Council's ability to provide emergency accommodation for people who are homeless and have complex support needs as detailed above in section 2.</p> <p>The cumulative impact of the ending of Supporting People services will result in their being no other supporting people services for people to access. For example, there would be no floating support to support people in a private tenancy, no alternative accommodation services for people with drug/alcohol issues etc</p>	
8b.	Cumulative Impacts –		

³ Transforming rehabilitation: a summary of evidence on reducing reoffending, Ministry of Justice Analytical Series, 2013, p5, https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/243718/evidence-reduce-reoffending.pdf

No	Question	Details
	Other public services (proposed changes elsewhere which might worsen the impacts identified above)	Supporting People are not aware of any other public service changes.

Section 3: Mitigating action

No	Action	Details
9.	Summarise any negative impacts and how these will be managed?	<p>Negative impacts identified in section 7:</p> <ol style="list-style-type: none"> 1. Leonard Stocks has rooms that are adapted to the needs of those with physical disabilities and therefore provides a means of housing people who are homeless and have a disability, which would not be available elsewhere. 38% of the clients entering the service in 2012/13 were long term sick or disabled. 2. Impacts include increasing homelessness as many clients were rough sleepers prior to accessing Leonard Stocks (74 of 106 in 2012/13). Potential impact on crime as offenders use the service- and having accommodation is known to reduce re-offending 3. Clients often have complex needs and are signposted by Leonard Stocks to GPS and specialist services such as mental health, drug treatment etc. The service promotes healthy and safe life choices to clients who often have chaotic lifestyles. <p>It will be very difficult to minimise negative impacts due to the cumulative effect of the overall reduction in Supporting People services, meaning that there are no alternative services to refer people to.</p> <p>We will monitor potential</p> <ul style="list-style-type: none"> • Increase in homelessness • Increase in crime • Increase in fear of crime • Increase in rough sleeping

		<ul style="list-style-type: none"> • Potential increase in temporary accommodation budget <p>The impacts will be monitored and reported to the Commissioning for Independence Board chaired by the Director of Adult Services.</p>
--	--	---

Section 4: Monitoring

No	Action	Details
10.	Outline plans to monitor the actual impact of your proposals	<ul style="list-style-type: none"> • Monitoring numbers of homelessness assessments - this information can be obtained from colleagues in housing and reported quarterly • Monitoring numbers of people accepted as statutorily homeless requiring emergency accommodation– this information can be obtained from colleagues in housing and reported quarterly • Monitoring temporary accommodation costs – this information can be obtained from colleagues in Housing Options and reported quarterly • Monitoring fear of crime – this information can be obtained from colleagues in community safety • Monitoring crime figures – this information can be obtained from colleagues in the police and reported quarterly • Monitoring rough sleepers – this information can be obtained from the rough sleepers count, or ‘No second night out’ if continued. <p>The following impacts will be monitored and reported to the Commissioning for Independence Board chaired by the Director of Adult Services.</p>

Section 5: Recommended course of action –

No	Action	Outcome	Tick ✓	Reasons/justification for recommended action
----	--------	---------	-----------	--

11.	<p>State a recommended course of action Clearly identify an option and justify reasons for this decision. The following four outcomes are possible from an assessment (and more than one may apply to a single proposal). Please select from the 4 outcomes and justify the reasons for your decision</p>	<p>Outcome 1: No major change required - EIA has not identified any potential for adverse impact in relation to equalities and all opportunities to promote equality have been taken</p>		
		<p>Outcome 2: Adjustments to remove barriers – Action to remove the barriers identified in relation to equalities have been taken or actions identified to better promote equality</p>		
		<p>Outcome 3: Continue with proposal - Despite having identified some <u>potential</u> for adverse impact / missed opportunities in relation to equalities or to promote equality. Full justification required, especially in relation to equalities, in line with the duty to have 'due regard'.</p>	x	<p>The purpose of this proposal is not to discriminate directly or indirectly, and does not amount to unlawful discrimination. The Council has to deliver significant savings, and in doing so has to prioritise its statutory responsibilities. Whilst the consultation has highlighted the benefits derived from the service together with the impact upon those who currently receive the service, this service is not statutory. The Council will endeavour, with its partners and the community, to mitigate against any adverse impacts. If any individual affected by the decision meets the FACS criteria, they will receive a service to meet their needs from Torbay & Southern Devon Health & Care Trust.</p> <p>In light of the views expressed in the consultation that if given additional time there may be opportunities to access different funding streams to enable the service to continue, the Council is now proposing the establishment of a one off transitional fund in the value of £135,000, which will be provided to the service in 2014/15. This transitional fund is designed to provide the service with sufficient time to explore opportunities to enable the service to continue for a future without Council funding.</p>

		Outcome 4: Stop and rethink – EIA has identified actual or potential unlawful discrimination in relation to equalities or adverse impact has been identified		
--	--	---	--	--

Appendix 1

Consultation Results: Leonard Stocks Centre- Reduce by 50%

There were 12 responses received which referred to this proposal. This included a petition signed by 31 people. There was also 2 focus groups held for clients where 10 people attended.

The service is provided by Chapter 1, with some elements of delivery sub-contracted to Shekinah Mission.

Theme	Examples of comments
<p>Impact on Individuals</p>	<p>People at the focus groups spoke of how Leonard Stocks gave them an opportunity to have a roof over their heads and be warm and safe. People spoke of the “miserable” time they had living on the streets and that it was impossible to move on in life without somewhere to live. “How can you apply for a job if you are filthy?”</p> <p>Several people stated that they would have died if Leonard Stocks were not there as they would have continued in a downward spiral of drug use, homelessness, crime, and ill health. One person stated that without Leonard Stocks, they would have committed suicide due to</p>

Theme	Examples of comments
	<p>mental health issues.</p>
<p>Impact on Statutory Services</p>	<p>“...offenders remain homeless and as a result continue offending, possibly for longer. This may mean the onus then falls on the statutory agencies but the overall cost to our community could be considerable.”</p> <p>People at the focus group spoke of the fact that Leonard Stocks had stopped them using other services such as A&E and outreach services. People also stated that they would be in prison, in contact with the police more, and costing these services money, if they weren't in Leonard Stocks.</p>
<p>Increase in Homelessness and Crime</p>	<p>“... is accommodation which usually provides the foundation for making changes. Whilst the statutory agencies seek to address offending they cannot provide effective interventions without suitable accommodation.”</p> <p>“There will only ever be one result from your proposed cuts and that'll be an increase in crime. Certainly not a good selling point for tourists or investment in the area.”</p> <p>People at the focus group spoke of “not being able to deal” with being on the streets. Several people stated that if they were back on the streets, they would return to committing crime and would probably end up in prison.</p>

Theme	Examples of comments
<p>Impact on wider community</p>	<p>“The centre is often the alternative to remanding in custody if a defendant has no other address to which he or she can, reliably, be bailed .If the centre is forced to close there will simply be more offenders and ex-offenders on the street and, therefore, more risk to the public and greater cost to the taxpayer.”</p> <p>“It is only an intelligent guess that this is going to lead to more crime, petty theft, burglaries, breaking into empty homes to squat, possible suicides coming out of total desperation. It also has to be considered how all this will then affect everyone living in Torbay and visiting Torbay.”</p> <p>People at the focus group stated that they thought it would damage the town and tourism if more people were homeless and on the streets.</p> <p>People at the focus group spoke of the impact on their families and the wider community, if they were homeless, using drugs and committing crime. For example, some people have children, who benefit greatly from their parent being supported in Leonard Stocks.</p>
<p>Financial Impact</p>	<p>“The proposed drastic and immediate cut could close a Centre which is not only a humanitarian necessity but saves society a great deal in the long run by helping the homeless to become honest and productive citizens.”</p> <p>“What on earth is the council thinking in cutting funding to the most vulnerable in the bay? Please stop wasting money on palm trees and stupid things around the bay and put it to good use help the helpless it is our duty.”</p>