TEMPLATE 2 - Full Equality Impact Assessment (EqIA) In order to carry out this assessment, it is important that you have completed the EqIA E-learning Module and read the Corporate Guidelines on EqIAs. Please refer to these to assist you in completing this form and assessment.

What are the proposals being assessed includes a new policy, policy review, se function, strategy, project, procedure, r	ervice review,	Consultation on proposed changes to Harrow Council Learning Disability Homes					
Which Directorate / Service has respor	sibility for this?	Community, Health and Wellbeing					
Name and job title of lead officer		Amanda Dade – Service Manager Strate	egic Commissioning				
Name & contact details of the other per EqIA:	rsons involved in the	Members of the LD Residential Services Deven Pillay - Harrow Mencap Angela Dias - HAD Eithne Staunton (Harrow Council) Barbara Korszniak (Harrow Council) Peter Singh (Harrow Council) Amanda Dade (Harrow Council)	Project Board, which includes <u>eithne.staunton@harrow.gov.uk</u> <u>barbara.korszniak@harrow.gov.uk</u> <u>peter.singh@harrow.gov.uk</u> <u>Amanda.dade@harrow.gov.uk</u>				
Date of assessment:		First draft: 6 December 2012 Second draft: 14 January 2013 Third draft: 28 January 2013 following fee	edback from Chair of DETG				
Stage 1: Overview							
 What are the aims, objectives, and desired outcomes of your proposals? (Explain proposals e.g. reduction / removal of service, deletion of posts, changing criteria etc) 	change to improve th 1. Close the in H 2. Change the st 3. Transfer the da	lies on Harrow Council Learning Disability e delivery of these services and they have arrow Council provided LD homes ructure of homes to a Supported Living mo aily management of the homes to a third pa ual change of model, looking at a range of	outlined the following options odel (de registration) arty/another provider				

On 13 September 2012 the council's cabinet agreed to talk to service users, their families/advocates and staff about the future of the residential care services directly provided by Harrow Council.
 The aims of the review are as follows: Enable local residential service provision for adult with learning disabilities that responds to current and future demand for specialist residential services Contribute to the achievement of Medium Term Financial Strategy savings of £2.275m in relation to residential care. For the LD homes there is a need to save between £700,000 and £1million which is between 16% and 27% of the whole budget for the service To consider all the information/responses received from the consultation Consider whether there are any residents who may be supported to live more independently.
 Consultation took place between 24 September 2012 and 14 December 2012. The consultation proposals for each home were as follows: For Southdown the idea put forward is to move towards a model of 24 hour supported living where people have a tenancy and support
 Bedford House becomes a specialist residential unit for people with profound and complex high level needs. The respite unit would move to an alternative building. The day service will be considered within a separate day centre consultation that will commence shortly.
 Woodlands Drive becomes a specialist residential unit for younger people, the building layout is particularly suitable for this client group as the sleeping and bathing facilities are on the upper floor. Some of the current older clients with a learning disability would live with older people who do not have a learning disability. There is evidence that this model works.
• The proposal put forward is that the service at Roxborough Park is improved and that some of the most vulnerable clients that are placed out of borough have the opportunity to live at this unit. This may mean that people with autism but need less support may need to move to another home
 The proposal put forward is that for 4 Gordon Avenue becomes a specialist respite care unit and current residents, where appropriate, could live with older people who do not have a learning disability. This model has worked well elsewhere, good person centred planning is required around each client.

2. What factors / forces could prevent you from achieving these aims, objectives and outcomes?	 Identified negative impact on individuals/groups Findings of EqIA – will identify if there are any gaps or differential impacts. Stakeholders do not understand what is being consulted on and are therefore unable to shape recommendations for future service provision; Lack of support from key stakeholders Fear and/or resistance to change by all stakeholders, Limited focus of the review which means that opportunities to develop wider housing options may be missed. Lack of appropriate solutions that deliver both the financial efficiencies and the improved outcomes for service users Failure to deliver the improved outcomes for people with learning disabilities e.g. deregistration of homes without clients being empowered to understand the rights and responsibilities of having a tenancy.
 3. Who are the customers? Who will be affected by this proposal? For example who are the external/internal customers, communities, partners, stakeholders, the workforce etc. 4. Is the responsibility shared with another department, authority or 	 Service users resident in the services under review Family members Staff Service users who are currently placed out of borough who may have the opportunity to move back to Harrow People with learning disabilities who may have a need to an intensive housing support option in the future Overall responsibility: Adult Services
 organisation? If so: Who are the partners? Who has the overall responsibility? 4a. How are/will they be involved in this assessment? 	Working in partnership with housing services regarding ongoing housing options for people with learning disability Regular meetings take place with housing services

Stage 2: Monitoring / Collecting Evidence / Data

5. What information is available to assess the impact of your proposals? Include the actual data, statistics and evidence (including full references) reviewed to determine the potential impact on each equality group (protected characteristic). This can include results from consultations and the involvement tracker, customer satisfaction surveys, focus groups, research interviews, staff surveys, workforce profiles, service users profiles, local and national research, evaluations etc

(Where possible include data on the nine protected characteristics. Where you have gaps, you may need to include this as an action to address in the action plan)

	Information be and Sex/Genc		the key c	lata on t	the following	g protected c	haracteristics	Age, Di	sability, Race
Age (including carers of young/older people)		4 Gordon Avenue (8	Roxborou Park (8	8	Southdown Crescent (7 clients)	Woodlands Drive (3	Bedford House residential (11 clien	respi	ord House – te (49 clients)
		clients)	clients)			clients)			
	Age								
	16 - 24	-		-	-	-		1	7
	25-44	-		1	2	- 2		4	31
	$\frac{45-64}{65+}$	- 8		/	4	2		3	11
			oobility of	- I all alian			Council'o Ero	mowork	- i databasa
	The main and	secondary u	Sability Of			u on hanow	Councils Fla	mework	TUALADASE
Disability (including carers of disabled	See box above All service use	ers accessing	the in-ho	use lear	ning disabil				ning disability.
people)	Some individu	1							1
		Bedford Residential	Gordon Avenue	Roxboro Park	ough Southde Crescer		ds <i>Residential</i> <i>total</i>	Bedford Respite	
	Secondary or additional disabilities								

Gender Reassignmentis very little information held on this protected characteristicMarriage / Civil PartnershipWhilst Harrow Council's Framework i database system is set up to collect this monitoring information there is very little information held on this protected characteristic.Marriage / Civil PartnershipNon of the service users living in the learning disability residential homes or accessing the residential respite at Bedford House are married. However many people have lived together in the same house for a number of years and there are some close friendships that will need to be considered if there are any changes to the homes necessitating moves for any service users.		Emotional and			1			1			
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Pregnancy and Maternity								ect this mo	onitoring ir	ntormation there	
		is very little info	ormation hel	d on this	protected c	haracteristic	С				
None of the service users accessing LD residential services are pregnant or have recently given birth.	Pregnancy and Maternity			-							
		None of the se	rvice users a	accessing	JLD reside	ntial service	s are pregna	ant or have	e recently	given birth.	

		4 Gordon Avenue	Roxborough Park	Southdown Crescent	Woodlands Drive	Bedford House – residential (14	Bedford House - respite (8 staff)
		(16 staff)	(22 staff)	(7 staff)	(8 staff)	staff)	
	Ethnicity	White or White British (British) – 4	White or White British (British) – 1	White or White British (British) – 1	White or White British (British) - 5	White or White British (British) - 4	White or White Britis (British) –
		White other (Spanish) – 1	White or White British (Irish) – 2	White or White British (Irish) – 1	White or White British (Irish) –	White or White British (Irish) –	White or White Britin (Irish) –
		Black or Black British (African) – 5	Black or Black British (African) – 9	White or White British (Greek Cypriot) – 1	Black or Black British (Caribbean) – 1	Black or Black British (African) - 4	Black or Black Britis (African) –
Race		Black or Black British (Caribbean) –	Black or Black British (Caribbean) – 7	Black or Black British (Caribbean) - 2	Black or Black British (Seychelles) - 1	Black or Black British (Caribbean) – 2	Asian or Asian Briti (Indian) –
		1Black or BlackBritish (Other)-2	Asian or Asian British (Indian) – 3	Asian or Asian British (Indian) – 2		Asian or Asian British (Indian) - 3	Asian or Asian Briti: (Bangladeshi) –
		Asian or Asian British (Indian) – 3					Asian or Asian Briti (Chinese) –
							Other Ethnic Bac ground (Iranian) –

Information included bel	4 Gordon	Roxborough	Southdown
	Avenue (16	Park (22	Crescent (7 staff)
	staff)	staff)	-
Ethnicity	White or	White or	White or
	White British	White British	White British
	(British) – 4	(British) – 1	(British) – 1
	White other	White or	White or
	(Spanish) – 1	White British	White British
		(Irish) - 2	(Irish) – 1
	Black or Black	Black or Black	White or
	British	British	White British
	(African) - 5	(African) – 9	(Greek
			Cypriot) -1
	Black or Black British	Black or Black British	Black or Black British
	(Caribbean) –	(Caribbean) –	(Caribbean)
	(Cariobean) –	(Caribbean) = 7	(Cariobeall) - 2
	Black or Black	Asian or Asian	Asian or
	British (Other)	British	Asian British
	-2	(Indian) - 3	(Indian) - 2
	Asian or Asian		
	British		
	(Indian) – 3		

use learning disability residential homes is

Woodlands

White or White

British (British)

White or White

British (Irish) -

Black or Black

(Caribbean) - 1

Black or Black

(Seychelles) - 1

(8

- 5

1

British

British

Drive

staff)

Bedford House

White or White

British (British)

White or White

British (Irish) -

Black or Black

Black or Black

(Caribbean) – 2

Asian or Asian

British (Indian)

British (African)

(14

- 4

1

- 4

British

- 3

– residential

staff)

Bedford House -

(8 staff)

(British) – 2

(Irish) -

(African) -

(Indian) -

White or White British

White or White British

Black or Black British

Asian or Asian British

Asian or Asian British

Asian or Asian British (Chinese) -

(Bangladeshi) -

Other Ethnic Back ground (Iranian) -

respite

Service user's languages are recorded. This is important both for a service provision point of view to ensure staff have the appropriate language skills to be able to communicate appropriately and to ensure that we consult in a meaningful way.

	4 Gordon Avenue (8	Roxborough Park (8	Southdown Crescent (7 clients)	Woodlands Drive (3	Bedford House – residential (11 clients)	Bedford House – respite (49 clients)
	clients)	clients)		clients)		
First language	English – 8	English – 7	English – 7	English – 3	English – 5	English – 34
		Gujarati– 1			Sign language – 1	Gujarati – 12
					Urdu – 1	Punjabi – 1
					Gujarati- 1	Other (not stated) –
						1

Staff languages are as follows:

	4 Gordon Avenue	Roxborough Park	Southdown Crescent (7	Woodlands Drive	Bedford House – residential (11 clients)	Bedford House – respite (49 clients)
	(8	(8	clients)	(3		(1) (1000)
	clients)	clients)		clients)		
Languages spoken other than English	Gujarati – 3	Gujarati – 3	Gujarati – 2	French – 1	Gujarati – 2	Afghan – 1
	Hindi – 1	Swahili – 4	Hindi – 2	Gaelic (Scottish) – 1	Swahili – 2	Bengali – 1
	Swahili – 2	Ghanian – 2	Punjabi – 1	Makaton trained – 2	Amharic – 1	Chinese – 1

Yoruba – Spanis Italian Portugese – eligion and belief of vithin the LD resider Religion and belief ation for service use 4 Gordon Avenue (8 clients) on Other –	h, & 1 clients is collated ntial homes supp are included in e ers is included be Roxborough Park (8 clients) - Christianity - 0 7 1 Hinduism - 2	ort individual ach individua elow: Southdown Crescent (7 clients) 6 Christianity – 6	service user l service use Woodlands Drive (3 clients) Christianity –	s to follow their chers person-centred Bedford House – residential (11 clients)	nosen religion or
Italian Portugese – eligion and belief of vithin the LD resider Religion and belief ation for service use 4 Gordon Avenue (8 clients) on Christianity	& 1 clients is collated ntial homes supp are included in e ers is included be Roxborough Park (8 clients) - Christianity - 0 7 1 Hinduism - 2	I on Harrow C ort individual ach individua elow: Southdown Crescent (7 clients) 6 Christianity – 6	service user l service use Woodlands Drive (3 clients) Christianity –	s to follow their chers person-centred Bedford House – residential (11 clients) Christianity – 8 Hinduism – 2	nosen religion or d plan. Bedford House – respite (49 clients) Christianity – 25 Hinduism – 11 Islam – 8
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ation is as follows 4 Gor Aven	don Roxborou 1e Park (8 (3	ıgh Southdov Crescent	wn Woodlar Drive 7	–residential (11	
client	s) clients)		clients)		
	6	0	1	7	24
7	2	7	2	4	25
	Avenue clients 4 e 4 : Harrow Council's F	AvenuePark(8(1clients)(24642415Framework i data	AvenueParkCrescent(8(8clients)clients)clients)46027Harrow Council's Framework i database system	AvenueParkCrescent (7 clients)Drive(8 clients)(8 clients)(7 clients)Crescent (7 clients)46014272	AvenueParkCrescent (7) clients)Drive-residential (11) clients)(8) clients)(8) clients)(7) clients)(3) clients)(11) clients)46017460172427242Harrow Council's Framework i database system is set up to collect this monito

There is no informati LD residential homes	on available on this protected characteristic in relation to service users accessing the under review.
6. Is there any other (local, regional, national research, repor media) data sources that can inform this assessment? Include this data (facts, figures, evidence, key findings) in thi section.	their practice and meet them.Listen to and learn from what older people with learning disability and their

-				 People unders Advoca disabil 	e with learning disabilities e with learning disabilities who also stood in care homes acy services make a big difference ities when they are in care homes. e consultation with staff, members, rs)			
data/information fo your proposals as Guidance on co	or any of the how they will	orotected ch affect them	aracteristics an . Any proposed nity involve	d you are unable to consultation needs t	r whether you need to. For example assess the potential impact, you m to be completed before progressir be accessed via the link be ment toolkit	ay want to ig with the	o consult with	them on
	Who was consulted?			What consultation methods were used?	What do the results show about the impact on different equality groups (protected characteristics)?	tak This ma proposa <i>(Also</i>	action are you consultation ay include rev als, steps to m adverse impa o Include thes wement Action Stage 5)	of the ? ising your itigate any ct. e in the
Clients Respondents to ac	ccessible que	estionnaire:		 Formal consultation meetings – one meeting 	Points raised by service users/carers and advocates during the consultation meetings	alternati	e users move ve provision sioners will ac	
<i>Respondent</i> Family/Carer	17 (44%)	<i>Age group</i> 16-24	3 (8%)	at each of the homes • A single	Clients have lived together for many years, any change could be very traumatic/stressful for them and families. Many	provider attentior relations	to pay partici to supporting ships betweer	ular 9
Service Users Advocate Staff member Did not answer	11(28%) 3 (8%) 3 (8%) 5 (13%)	25-34 45-54 55-64 65+ Did not	4 (10%) 2 (5%) 9 (23%) 10 (26%) 11 28%)	accessible questionnaire • Written feedback	them and families. Many clients stated that, 'I like it here', and families fed back 'we thought this would be a home for life now feel that the rug has been pulled from	residents. Each resident will have a		

		answer			through letters		nder our feet', 'We are living
From completed by					and email	ir	fear of service cuts'.
Myself	20 (51%)	Sex			using the dedicated		here was general support for hange at Southdown.
With Support from family member/Carer	11 (28%)	Male	13 (33%)		email address		Vill future placements be in-
With support of an advocate	3 (8%)	Female	11 (28%)		Idconsultation	 Will future placements be borough?/If residents mov will they be able to live in t 	
Did not answer	5 (13%)	Did not answer	15 (39%)		<u>@harrow.gov.</u> uk 	р	art of Harrow?
Respondent is part of		Religion and belief		•	The opportunity to speak directly	tł	he proposals are based on ne need to save money and ot the needs of clients
Gordon Avenue	8 (20%)	Christianity	21 (54%)		with Amanda	1 _	he standard of some here
64/66 Woodlands	6 (16%)	Agnostic	2 (5%)		Dade and		he standard of care by rivate providers is poor and
Roxborough Park	5 (13%)	Hinduism	2 (5%)		Barbara		omplaints can fall on deaf
Southdown	3 (8%)	Humanist	1 (3%)		Korszniak on		ars
Bedford House Respite Services where I go for a short break	8 (20%)	Islam			a phone 1 (3%)		re there any guarantees that urrent service users will not
Bedford Day and Respite Service	1 (3%)	Jainism			1 (3%)	lc	ose a service?
Bedford House where I live	0	Did not answer			11 (27%)	ir	he proposed changes result a stress, so there is a need for
Bedford House Day Services where I go out during the day but do not stay the night	0					good communication, The need for signers for people with communication difficultie	
Did not answer	8 (20%)	Ethnicity					here is a need for a greater
		White:			22 (56%)		umber of respite care beds s at the moment some of the
D. 1.1.		British Asian or			2 (00/)		espite beds are taken up by
Disability		Asian Asian British:			3 (8%)		mergency placements cific points within each home
		Indian					
Yes	13 (33%)	White: Irish			2 (5%)	Southdo	wn Crescent

person-centred plan and a range of housing options will be considered which might include a care home if appropriate but also include: Harrow Shared Lives, supported housing and specialist learning disability services.

> (1) Each person's communication needs will be identified and included in their care plan should a move to an alternative placement be required.

(2) Where people have skills e.g. to carry out household tasks that they value these will be identified in the person-centred plan and opportunities to maintain skills and interests will be built into any future placement should a move be required.

(3) If service users move to older peoples care

No		9 (23%)	Asian or Asian British: other	1 (3%)	clients on the importance of money management or the concept of money for some	home provision staff within that provision will need to
Did not answer		17 (44%)	Asian or Asian British : Bangladeshi	1 (3%)	clients Woodlands Drive	demonstrate their knowledge and skills in managing the identified needs of the
			Other Asian Group: Greek	1 (3%) 9 (22%)	have been living here for 23 years and they may need to	individual service users referred to them
Did not answer			9 (2270)	raised about friendships and the need to maintain these. Could people be moved together?	Whilst any potential move can be distressing and anxiety- provoking good care	
					Gordon Avenue	management, planning and a person-centred approach can
Response to	face-to-fa	ce event	s:		 Older service users at Gordon Avenue have fewer people to speak up for them A number of service users 	reduce the impact. If any move is required an individual transition plan will be developed
Home/Venu e	Date	Servi ce Users	Family, carers and advocates	Staff	stated that they did not want to move from their homes as they like living at Gordon Avenue	with each service user in discussion with family, current key worker and advocate
Southdown Crescent	4.11.12	5 from 6 possibl	2 plus 1 friend from 8 possible	7 from 7	Roxborough Park	(where appropriate)
Bedford House	9.10.12	e 4 from 11 for reside ntial care	6 from 11 for residential care 10 from 46 for respite Also Cllr Stephen Wright	21 from	Some clients have challenging behaviour, its not always apparent because of the good quality of staff, this should not count against the clients Bedford House	Friendships groups will be identified and if moves take place support to maintain friendships will be included in service user's person-centred transition plan.
		0 from 49 for respite	and 2 members of the Friends of Bedford House		 The council should consider turning Bedford House into a 20 bed respite unit and that 	At present whilst there are nine respite beds at Bedford House

Woodlands Drive Gordon Avenue Roxborough	17.10.12 19.10.12 24.10.12	3 from 3 8 from 8 7 from	5 from 11 Also 3 from Advocacy Voice 3 from 10 4 staff attended as key workers 12 from 17	8 from 8 14 atter	to another <u>• There was</u> ded from u6 e of resp emergency	concern about the	however an analysis of the use of beds has shown that respite beds are also used for emergency placements that 'block' the availability of space available for respite and can
Park Civic Centre*	8.11.12	8 None	10		rom Unison	-	also cause cancellation in planned short breaks for families and service users. In redesigning short break provision the effective use of
Bedford House^ Gordon	22.11.12	n/a n/a	n/a n/a		rom Unison ¢ipants arrived	-	emergency placements will be considered to ensure that there is a reduced impact on respite
Avenue^ Bedford House~	6.12.12	2	12 from 46 * Invitation sent to service users and carers who were unable to attend the meetings that had taken place in each Home. ^ Invitation sent to staff who were unable to attend the meetings that had taken place in each Home and to unions ~ Invitation sent only to all service users and carers of the respite service at Bedford House		n/a		resources. This is likely to mean that the impact of a reduction in physical bed units will be mitigated and reduced.

Carers/families/Advocates See box above for breakdown of who responded to the consultation.	Formal consultation meetings – one meeting	Please see box above. A particular issue identified was that any proposed changes	A consultation report summarising outcomes of all consultation activity will be circulated as soon as it is
	at each of the homes plus an additional meeting at the civic centre and an additional specific meeting for carers of the Bedford House respite service • A single accessible questionnaire • Written feedback	result in stress, so there is a	available. A communication plan will be developed including common questions and answers to improve communication. We have identified staff who have Makaton/BSL skills. Staff in the LD homes know service users and family members well and are able to advise on the most effective communication methods.
	through letters and email using the dedicated		

	 Idcons @harr Uk The opport speak with Ar Dade a Barbar 	ra niak on		
Staff	 Inform consul meetin A sing access question Writter feedbat throug and en using the dedicate email a em	al Poin tation servi ogs focus le the s sible rathe onnaire or the n ack h letters nail the ted address <u>ultation</u> ow.gov.	 hts/questions raised across the vices by staff during their informal sultation meetings. Most staffed ussed on the concerns they had for service users that they support her than concerns about their roles the future of their jobs. Friendships between clients who have lived together for years should be considered in the consultation and following any decision that might necessitate a move for people What are the implications for the total number of respite hours? Will proposed services reflect Harrow's diverse population? [this is an aim so that the council is able to meet a greater variety of needs] 	Staff members were engaged as part of the consultation both to ensure that they could feed in their knowledge and expertise to the review in addition to ensuring they had as much information as possible so that they could provide appropriate support to service users and family members. If Cabinet takes a decision leading to a change in the roles, responsibilities and/or the structure of staffing a formal consultation in accordance with the Councils Change Management Protocol. Concerns raised regarding service users are addressed in

	Dade and Barbara Korszniak on a phone	 Some staff thought that Bedford House would be may be too big for 11 clients. Many people at Gordon Avenue are old, can they not continue to live here during their lives and then a decision in made? Some residents have lived here for 23 years and used to have tenancy rights [this situation changed when the building became a residential unit] How can we ensure that good quality information is used in deciding where service users may be moved to [the assessments will form the basis for this and staff will play an important role in providing information. There is also the need to think about places for younger people transitioning from children's services 	the 'client -box' above.
Unions	 Informal consultation meetings A single accessible questionnaire Written feedback 	GMB were invited to all meetings but did not attend. Due to a an email error, Unison were not informed of the first four staff consultation meetings, but attended meetings at Roxborough Park and the additional staff meeting at Bedford House and gave the	Unions were engaged at an early point in the review of the LD residential services in order to inform and shape recommendations. If Cabinet takes a decision leading to a change in the roles, responsibilities and/or the structure of staffing a formal

	to temporary/agency staff and this impacts on permanent staff • a breakdown of the anticipated savings for each service
Specific feedback from Harrow Association of Disabled People	 Whilst we understand the council's dire financial situation, and don't advocate residential care as a good practice solution for care, the reality is that those places are home to the people who have lived there for years. HAD has done advocacy cases in the past for individuals who really want to stay there when plans were being discussed to move them on, so we are very aware that this is a traumatic experience which will feel very negative to many people. So in the first instance, as long as the people who live there clearly want to be able to stay, we'd like to see other ways of keeping them open, at least until falling numbers make the services totally financially unviable. Do the homes need to be closed as long as there are people who want to live in them? In other areas, spare rooms (I believe there are a few, as when people die or move out, they are not really filling them) are being given to local people such as students in return for their guaranteed availability to offer support at certain agreed times. Of course those people undergo the same reference and CRB checks as staff, but it reduces the cost of sleep over staff hugely. Generally, outsourcing services makes them much cheaper than managing them in the statutory sector, and this should be considered. The not for profit sector can sometimes get funding to make changes to the property to create innovative services for more than one client group, which would deal with the falling numbers, and improve inclusion. Try to avoid private placements where quality of life declines to ensure shareholders needs are met. If the consultation indicated that moving could be a positive option for the people who live there, the following issues are important.

People must have realistic and informed choices, in a way which is accessible to them, about where they could live, who they live with and how their home meets their other life choices. Where the person is not able to represent their views clearly, and could have their views overpowered by well meaning families, staff members and commissioners, independent advocacy should be considered. For many people, capacity assessments and Best Interests decisions should be used.
Support planning for options need to be very creative and include visits and other means of people being able to understand options to the best level possible.
There would also need to be support to move, including proper transitional arrangements, appropriate to each person's needs.
Where people want to live in some form of residential, the quality of their life should not be reduced. It may be that people are interested in living with a mixed client group, not everyone with a learning disability wants to spend their lives with others with learning disabilities.
Therefore if for example, someone prefers residential, and is happy to live with older people, only homes where current quality of life would clearly be maintained should be considered. Not all, but many older people's homes seem very keen in practice on promoting exclusion, institutionalisation and lack of dignity, and just because generic older people are unfairly forced to live in this way, does not meant that people with learning disabilities should also meet this fate.
There must be guarantees that where support is needed to maintain essential relationships (with people, pets etc), or activities, that a move will not jeopardise this. However, steps must be taken to find out what really matters to people, so that they are not forced to stay in touch with people they would actually be quite relieved to leave behind.
I think housing needs to be involved and other council departments and external service areas which may be part of the solution.

Specific feedback from Harrow Mencap	 Harrow Mencap welcomes this consultation and the opportunity to respond. It is worth noting that most of these homes where opened in the 80/90s in response to the closure of long stay hospitals and whilst we acknowledge the good standard of these residential care homes their limitations must also be recognised in order for the council to meet existing and future needs and demands. We note that there is a: Predominance of residential care as the main housing option for people with learning disabilities in Harrow Lack of local provisions for people with complex needs; people with a dual diagnosis of mental health and learning disability and for people on the autistic spectrum.
	Q1. The Council would like to think about using the residential homes on supporting people with higher needs
	We disagree that the council's residential care homes should be used solely for people with higher support needs as residential care should not be the only option open to people with higher needs. With individualised packages of support, all people regardless of needs should have a full range of options including homes of their own, supported living, living with a family and as well as residential group homes. However whilst housing options are limited, priority or consideration of use of existing provisions should be given to those with higher needs. This must be done on an individualised basis rather than considering or moving people as a 'group' and at the individuals pace with the involvement of families and advocates. If the council goes down this route they need to consider the capacity of current advocacy services in the borough.
	Q2. As an idea the council were thinking that young adults with learning disabilities and who need lots of support including those people with autism and challenging behaviour should be helped to stay living in Harrow near to their family rather than moving further away

	We fully agree that young adults with complex needs and those on the autistic spectrum should be living as full citizens and be part of their local community. We feel that moving people out of borough isolates them from families and friends and makes them more vulnerable to poor care and at greater risk of abuse. We would also draw the councils attention to the Winterbourne View final report which guides councils to plan provision from childhood for the care and support needs of people with challenging needs.
	t Bedford House the Council would like to separate - vould mean the respite and the day services would be in different buildings
	We agree with the separation of day services, respite and residential care at Bedford House. Whilst we know some individuals and their carer's are happy with the respite service at Bedford House (in part due to the lack of alternative options) there is a growing population who feel it does not meet their individual needs or requirements; too large and 'institutional'. We would urge the council to think more creatively about 'respite' / 'breaks'. As well as looking at a building based option, The Council should work with providers to develop the market to provide a range of flexible and individualised options to include opportunities for breaks away from home such as supported holiday, time with other families etc and support in the home whilst the carer is away or pursuing another activity etc.
Q4.	We are thinking about using Gordon Avenue as Harrows respite service This means anyone staying for a short break will go here and not to Bedford house
	Please see answer above
Q5.	The council would like to use other places you can go to for a short break like Harrow Shared Lives Scheme Shared Lives is where you would go and stay with a family in their home
I	

	We are in agreement with a wide range of respite support options being available and feel that shared lives should be one of these.
Q6.	The Council would like to use more supported living instead of residential care in the future Supported living can also be used by people who need 24hr care We could change the homes to Supported Living Supported Living helps you take more control of your life In supported living you have a tenancy, you pay rent and you will have support from staff. You may be able to get help to pay your rent with housing benefit You will have control over who lives with you and who provides your support Supported living can be for people who have lots of needs
Q7.	We are in agreement that there should be a range of options in Harrow for people with learning disabilities. We feel it is important that the council recognizes unregistering a care home does not make it a supported living home. Work needs to be done with the tenants on their rights and responsibilities and work with staff teams on the fundamental differences between residential care and supported living. There also needs to be openness, honesty and transparency in any changes – for example people will not have total control over who lives with them or support them. Further information on changing from care home to supported living including changes in culture can be found in "Feeling settled" By the National Development Team For Inclusion" http://www.ndti.org.uk/uploads/files/Insights 6 - Feeling Settled1.pdf The Council plans to make more places available in independent/supported living We would like to use Southdown as supported living where people can have a tenancy and support
	Please see answer above

Q8.	The council think it would be good if older people with learning disabilities live with older people who do not have a learning disability We are thinking about this for some of the clients at Gordon Avenue and 66 Woodlands Drive
	Whilst there is an argument that older people with learning disabilities should be living with other older people. The following must be taken in consideration: Older people with learning disabilities should be afforded the same range of housing choices as those offered to other older people. This should include sheltered accommodation, extra care, care in the home as well as residential care. If the council is defining older people with learning disabilities as over 65 it should be noted that this is significantly lower than the current population of
c)	older people in care homes. This could mean them living with people older and frailer than they are. Funding for older people's care homes and requirements are different from those for people with learning disabilities therefore the council will need to ensure that there is funding available to maintain people's social lives and activities. Without consideration of these factors and adjustments made for older people with learning disabilities their health and wellbeing will suffer and they will not receive adequate care and support; evidence for this can be found in "Stuck
Q9.	869 People With Learning disabilities Resident in Care Homes for older people" (Learning Disability alliance Scotland) <u>http://www.ldascotland.org/docs/STUCK.pdf</u> (NB referred to in section 6 above) We would like to make Roxborough Park into a home for people who have
	 autism and need lots of support This may mean that people with autism but need less support may need to move to another home We believe that the council needs to have more provisions for people with complex needs. However there should be a range of options based on the needs of individuals rather than a 'group' as we have highlighted

				above.		
				Other Comments		
				Whilst we welcome this consultation we feel it is narrow in its focus and there may be a lost opportunity to develop an integrated Accommodation and Housing strategy which is sustainable and responsive to the future needs of disabled people. In addition services for people with a learning disability needs to be viewed in a holistic way thereby acknowledging the critical interconnectedness of day provisions/ opportunities; community resources/facilities/activities and Accommodation/Housing.		
Stage 3: Assessin	g Impact ar	nd Analysis				
			out the impact on d	different groups? Consider wheth	er the evidence shows potential for differential impact,	
if so state whether	this is an a	dverse or p	ositive impact? How	w likely is this to happen? How yo	ou will mitigate/remove any adverse impact?	
Protected Characteristic	Positive	Adverse	•	his impact is, how likely it is to extent of impact if it was to occur.	What measures can you take to eliminate or reduce the adverse impact(s)? E.g. consultation, research, implement equality monitoring etc (Also Include these in the Improvement Action Plan at Stage 5)	
Age (including carers of young/older people)			 people with learn homes for older point of the disability possible People matched bullying an other possible 	ade that means that older ing disabilities move into care people without a learning adverse impacts are as follows: ay experience harassment and nd viewed as being different if into care homes for older	 Research has shown that incidents of harassment and bullying are more likely to occur when people first move in. The same research has recommended that people with learning disabilities who move to care homes for older people should have access to independent advocacy. If service users move 	

	to alternative provision commissioners will advise the provider to pay particular attention to supporting relationships between residents.
 People may experience multiple loss (death) as they may be much younger than the other care home residents without a learning disability. The PSSRU (University of Kent) estimates survival rate of 'older people' at an average of 30 months in care homes and the Centre for Death and Society (University of Bath) estimates the average age of residents in care homes as 90. 	 Each resident will have a person-centred plan and a range of housing options will be considered which might include a care home if appropriate but also include: Harrow Shared Lives, supported housing and specialist learning disability services.
People may lose routines, opportunities to utilise skills, and support with communication to make needs known.	 (1) Each person's communication needs will be identified and included in their care plan should a move to an alternative placement be required. (2) Where people have skills e.g. to carry out household tasks that they value these will be identified in the person-centred plan and opportunities to maintain skills and interests will be built into any future placement should

	 a move be required. (3) If service users move to older peoples care home provision staff within that provision will need to demonstrate their knowledge and skills in managing the identified needs of the individual service users referred to them.
People may be disorientated by change and may experience exacerbation in anxiety-related conditions.	Whilst any potential move can be distressing and anxiety-provoking good care management, planning and a person-centred approach can reduce the impact. If any move is required an individual transition plan will be developed with each service user in discussion with family, current key worker and advocate (where appropriate)
People may lose long-term friendships if assessed needs mean they require a different housing option than other residents in the home where they live.	Friendships groups will be identified and if moves take place support to maintain friendships will be included in service user's person-centred transition plan.
Reduction in the number of respite beds from 9 at Bedford House to 8 at Gordon Avenue may impact on the availability of respite at popular times e.g. weekends.	At present whilst there are nine respite beds at Bedford House however an analysis of the use of beds has shown that respite beds are also used for emergency placements that 'block' the availability of space available for respite and can also cause cancellation in planned short breaks for families and service users. In redesigning short break provision the effective use of emergency placements will be considered to ensure that there is a reduced impact on respite resources. This is likely to mean that the impact of a reduction in physical bed units will be

		mitigated and reduced.
Age (including carers of young/older people)	Younger people with profound and mulitple learning disability, autism and challenging behaviour will have more opportunity to remain in Harrow near to their family and friends if there is more local provision that can support people with challenging or complex need	Positive impact
Disability (including carers of disabled people)	Same type of potential impacts as Age above in addition to: People with mobility difficulties who live in homes with stairs and are moved to single-storey accommodation may lose the opportunity to maintain their coordination, balance and naturally occurring exercise that comes from living in a two-story property. However service users may also experience a positive impact on their independence for example where they have relied on others to ensure their safety when climbing stairs.	 (1) Each resident will have a person-centred plan and a range of housing options will be considered which might include a care home if appropriate but also include: Harrow Shared Lives, supported housing and specialist learning disability services. (2) Each person's communication needs will be identified and included in their care plan should a move to an alternative placement be required. (3) Where people have skills e.g. to carry out household tasks that they value these will be identified in the person-centred plan and opportunities to maintain skills and interests will be built into any future placement should a move be required. (4) If service users move to older peoples care home provision staff within that provision will need to demonstrate their knowledge and skills in managing the identified needs of the individual service users move to

					accommodation that does not provide an opportunity to maintain mobility e.g. climbing stairs, this will be identified in their person- centred care plan to ensure opportunities to maintain mobility are maximised.	
Gender Reassignment	Non identified	Non identified				
Marriage and Civil Partnership	Non identified	Non identified				
Pregnancy and Maternity	Non identified	Non identified				
Race	Non identified	Non identified				
Religion or Belief	Non identified	Non identified				
Sex	Non identified	Non identified				
Sexual Orientation	Non identified	Non identified				
Other (please	Non	Non				
state)	identified	identified				
			f any cumulative impact?	Harrow Council is cor	nsidering reviewing all day service provision which	
			view of services. This would	includes the Neighbourhood Resource Centres accessed by some of the		
			levant information to	service users affected by the review of in-house residential services. There		
	understand the cumulative effect of all of the decisions.			is a need to consider the cumulative impact of the two reviews and		
				whether there are any individual service users that may need to continue		
				to access day opportunities in order to help with a transition or move		
				learning disability non		
•		•				
Example: A local authority is making changes to four different policies. These are funding and delivering social care, day care, and respite for carers and community transport. Small changes in each of these policies may disadvantage disabled people, but the cumulative effect of changes to these areas could have a significant effect on disabled people's participation in public life. The actual and potential effect on			y care, and respite for carers in each of these policies le cumulative effect of lificant effect on disabled	to access day opport	unities in order to help with a transition or move essary following any decision on the future of the	

regard to eliminate discrimination, had groups.	that inequalities between in this instance for disabled not continue or widen. This may the effects of the policy on in any one area. the towards the requirements of the Pu arassment and victimisation, advance	blic Sector Equality Duty (PSED), whi equality of opportunity and foster goo vill be available in large print, Braille an)	od relations between different
Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010	Advance equality of opportunity between people from different groups	Foster good relations between people from different groups	Are there any actions you can take to meet the PSED requirements? (List these here and include them in the Improvement Action Plan at Stage 5)
The proposals and consultation were developed carefully in order to prevent unlawful discrimination. Both written and spoken information were delivered in user- friendly manner in order to support greater and meaningful involvement	This review aims to deliver the development of good quality services that support people with learning disabilities to live as independently as possible. Whilst current services are performing well there are some people who may be 'over-provided for' for example where an individual is living is residential care but may benefit from moving to a supported living environment. The review aims to deliver against the personalisation agenda as outlined in Putting People First (2007) One of the key expectations of this		

		suppor as pose maximu Within to prov possibl settings and tha provide "persor In Janu Act Pe upon P update more p This fra need fo of area alterna more p resider control transitio	a is that people wi ted to live as inde- sible, providing th um choice and co this there is an as ide as many people e with support to s other than resident at where resident at should be nalised" as possib any 2011 the This rsonal Partnersh outting People First d framework for d ersonalised social amework expression is, including more tives to residential ersonalisation with at a settings and g and flexibility for on to adult service	ependently em introl. ssumption ble as live in ential care, al care is e a ble. nk Local, ip built st with an lelivering il care. ed the n a range flexible il care, th greater children in es.				for to the Co	
-		-		•	tected group being victimisation and	-	•		-
	Age (including carers)	Disability (including carers)	Gender Reassignment	Marriage and Civil Partnership	Pregnancy and Maternity	Race	Religion and Belief	Sex	Sexual Orientation
Yes No									
INU									

If you have answered "yes" to any of the above, set out what justification there may be for this in Q12a below - link this to the aims of the proposal and whether the disadvantage is proportionate to the need to meet these aims. (You are encouraged to seek legal advice, if you are concerned that the proposal may breach the equality legislation or you are unsure whether there is objective justification for the proposal)

If the analysis shows the potential for serious adverse impact or disadvantage (or potential discrimination) but you have identified a potential justification for this, this information must be presented to the decision maker for a final decision to be made on whether the disadvantage is proportionate to achieve the aims of the proposal.

If there are adverse effects that are not justified and cannot be mitigated, you should not proceed with the proposal. (select outcome 4) If the analysis shows unlawful conduct under the equalities legislation, you should not proceed with the proposal. (select outcome 4)

Stage 4: Decision

12. Please indicate which of the following statements best describes the outcome of your EqIA (tick one box only)

Outcome 1 – No change required: when the EqIA has not identified any potential for unlawful conduct or adverse impact and all opportunities to enhance equality are being addressed.

Outcome 2 – Minor adjustments to remove / mitigate adverse impact or enhance equality have been identified by the EqIA. *List the actions you propose to take to address this in the Improvement Action Plan at Stage 5*

Outcome 3 – Continue with proposals despite having identified potential for adverse impact or missed opportunities to enhance equality. In this case, the justification needs to be included in the EqIA and should be in line with the PSED to have 'due regard'. In some cases, compelling reasons will be needed. You should also consider whether there are sufficient plans to reduce the adverse impact and/or plans to monitor the impact. (explain this in 12a below)

Outcome 4 – Stop and rethink: when there is potential for serious adverse impact or disadvantage to one or more protected groups. (You are encouraged to seek Legal Advice about the potential for unlawful conduct under equalities legislation) 12a. If your EqIA is assessed as outcome 3 or have ticked

'yes' in Q11, explain your justification with full reasoning to continue with your proposals.

Stage 5: Making Adjustments (Improvement Action Plan)						
13 . List below any actions you plan to take as a result of this impact assessment. This should include any actions identified throughout the EqIA.						
Area of potential adverse impact e.g. Act Race, Disability	ion proposed	Desired Outcome	Target Date	Lead Officer	Progress	

People may experience harassment and bullying and viewed as being different if they move into care homes for older people.	If service users move to alternative provision commissioners will advise the provider to pay particular attention to supporting relationships between residents.	Service users will settle in to a new home, be valued and develop new relationships	Dependent upon any decision made by Cabinet in March 2013	Allocated social worker	
People may experience multiple loss (death) as they may be much younger than the other care home residents without a learning disability.	Each resident will have a person-centred plan and a range of housing options will be considered which might include a care home if appropriate but also include: Harrow Shared Lives, supported housing and specialist learning disability services.	The determinants for a person's care and treatment will be need rather than age. People will be supported in an appropriate setting that is able to meet their assessed needs.	Dependent upon any decision made by Cabinet in March 2013	Allocated social worker	
People may lose routines, opportunities to utilise skills, and support with communication to make needs known	 (1) Each person's communication needs will be identified and included in their care plan should a move to an alternative placement be required. (2) Where people have skills e.g. to carry out 	Individuals will be able to maintain their skills and interests in provision that supports their health and wellbeing enabling an active and fulfilling life.	Dependent upon any decision made by Cabinet in March 2013	Allocated social worker	

household tasks that they value		
these will be identified in the		
person-centred		
plan and		
opportunities to		
maintain skills		
and interests will		
be built into any future placement		
should a move be		
required.		
(3) If service users		
move to older peoples care		
home provision		
staff within that		
provision will		
need to		
demonstrate their		
knowledge and		
skills in managing the identified		
needs of the		
individual service		
users referred to		
them		

People may be disorientated by change and may experience exacerbation in anxiety- related conditions.	Whilst any potential move can be distressing and anxiety-provoking good care management, planning and a person- centred approach can reduce the impact. If any move is required an individual transition plan will be developed with each service user in discussion with family, current key worker and advocate (where appropriate)	Service users will be supported to maintain their social networks	Dependent upon any decision made by Cabinet in March 2013	Allocated social worker
People may lose long- term friendships if assessed needs mean they require a different housing option than other residents in the home where they live.	Friendships groups will be identified and if moves take place support to maintain friendships will be included in service user's person- centred transition plan.		Dependent upon any decision made by Cabinet in March 2013	Allocated social worker
If a decision is made to move residential respite from Bedford House to Gordon avenue there would be a reduction in the number of beds available from 9 to 8. This may impact on availability of respite however the number of	At present whilst there are nine respite beds at Bedford House however an analysis of the use of beds has shown that respite beds are also used for emergency placements that 'block' the availability of space available for respite and can also cause	Families will continue to access short breaks/respite in order to support their caring role	Dependent upon any decision made by Cabinet in March 2013	Barbara Korszniak

service users who access respite is not simply reliant on bed- space but on support needs and staff availability. There is no intention to reduce the number of staff working within residential respite within this review.	cancellation in planned short breaks for families and service users. In redesigning short break provision the effective use of emergency placements will be considered to ensure that there is a reduced impact on respite resources. This is likely to mean that the impact of a reduction in physical bed units will be mitigated and reduced.				
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Stage 6 - Monitoring The full impact of the decision may only be known after the proposals have been implemented, it is therefore important to ensure effective monitoring measures are in place to assess the impact.

14. How will you monitor the impact of the proposals once they have been implemented? How often will you do this? (Also Include in Improvement Action Plan at Stage 5)	 However if week 6 foll regarding passess per a decision Contract m A project gact as 'critiand advise 	any service user in owing the move. potential to take a ople's experience of is made that nece ionitoring is in place roup to monitor the cal friend' regarding	b be monitored via moves they will be Discussions are tal 'patient experience of any change that ssitates change for ce for local services e in-house residen ng the process will rocess should char by Cabinet.	reviewed at king place e approach' to may take place if r individuals. s. tial review and to continue to meet
15 . Do you currently monitor this function / service? Do you know who your service users are?	Yes		No	

16 . What monitoring measures need to be introduced to ensure effective monitoring of your proposals? (Also Include in Improvement Action Plan at Stage 5)	As 14 above.
17. How will the results of any monitoring be analysed, reported and publicised? (<i>Also Include in Improvement Action Plan at Stage 5</i>)	Since 2009 we have been developing a QA system which brings together the planning and design of care services with a variety of perspectives on the quality of services, including feedback from independent bodies, consumers, professionals and providers. It has resulted in major improvements to provider services and outcomes for vulnerable people and carers. In order to ascertain a holistic understanding of the quality of our services, a QA quadrant model and review tool (QAQ) was developed. This is based upon four key areas: independent challenge, provider challenge, professional challenge and consumer/citizen challenge. The Local Account is an important tool for the public to use in holding the local authority to account for how money is spent and on the quality of the services it provides. During 2012/13 we have established a group of Harrow residents that include people who use services along with those who don't. They work with us to develop the Local Account throughout the year. The outcome of this review will be reflected in the Local Account.
18. Have you received any complaints or compliments about the policy, service, function, project or proposals being assessed? If so, provide details.	Yes as follows: 2.10.12 – Letter from NS raising concerns about possible supported living model at Southdown and potential impact on family member 13.10.12 – Letter from SP regarding accessible questionnaire and also the experience of member of Cabinet taking decisions. 1.11.12 DH letter regarding concern about cuts to transport, day services and continued spend on services under review. 3.12.12 Press enquiry following a letter to Harrow Observer regarding the review of services at Gordon Avenue. 12.12.12 email from MS regarding proposed changes to Gordon

Avenue and the potential impact on a family member 13.12.12 Letter from PM regarding proposed closure of Woodlands	
Drive and the potential impact on a family member	
13.12.12 Letter from local MP regarding the review of the in-house	
residential services and the possible impact, stress and anxiety.	

Stage 7 – Reporting outcomes The completed EqIA must be attached to all committee reports and a summary of the key findings included in the relevant section within them.

EqIA's will also be published on the Council's website and made available to members of the public on request.

	Officers recommend that the Council proceed with the following
	proposal for each of the in-house learning disability homes as follows:
	 A. Bedford House - work to achieve separation between the long term residential, respite and day services at Bedford House B. Gordon Avenue - to change the model of the service and identify a choice of alternative housing options for the service users living at the home. To use the service as a Residential Respite provision in the future C. Woodlands Drive - to change the model of the service and identify a choice of alternative housing options for the service and identify a choice of alternative housing options for the service and identify a choice of alternative housing options for the service and identify a choice of alternative housing options for the service and identify a choice of alternative housing options for the service and identify a choice of alternative housing options for the service and identify a choice of alternative housing options for the service and identify a choice of alternative housing options for the service and identify a choice of alternative housing options for the service and identify a choice of alternative housing options for the service and identify a choice of alternative housing options for the service and identify a choice of alternative housing options for the service and identify a choice of alternative housing options for the service and identify a choice of alternative housing options for the service and identify a choice of alternative housing options for the service and identify a choice of alternative housing options for the service and identify a choice of alternative housing options for the service and identify a choice of alternative housing options for the service and identify a choice of alternative housing options for the service and identify a choice of alternative housing options for the service and identify a choice of alternative housing options for the service and identify a choice of alternative housing options for the service and identify a choice of alternative housing options for the service and identify a choice of alternative
19. Summary of the assessment	D. Southdown Crescent - de-register the service and support people to live in a supported living environment
NOTE: This section can also be used in your reports, however you must ensure the full EqIA is available as a background paper for the decision makers (Cabinet, Overview and Scrutiny, CSB etc) What are the key impacts – both adverse and positive? Are there any particular groups affected more than others? Do you suggest proceeding with your proposals although an adverse impact has been identified? If yes, what are your justifications for this? What course of action are you advising as a result of this EqIA?	 E. Roxborough Park - maintain and develop the current model of the service delivering high quality care to people with autism and challenging behaviour. There are some potential adverse impacts associated with the proposed recommendations which will include: supporting people with learning disabilities to move to a new home often when they would prefer to remain where they are currently living this could lead to impacts such as: an increase in stress and anxiety caused by moving home, loss of friendships and support from staff who have known service users for a long time, potential loss of opportunities to take part in activities and hobbies if staffing in a new home is at a lower staff to service ratio than is currently in place. It would be important to plan any move should moves be required carefully using a person-centred approach that identifies what is important for each service user and what support needs to be put in place to mitigate any potential adverse impact. If people with learning disability move to homes that are not specialised learning disability specific homes then commissioners must ensure that staff are able to meet assessed needs of individual service

users and in particular any specific communication needs..

20 . How will the impact assessment be publicised? E.g. Council website, intranet, forums, groups etc	Learning Disability Homes Project Board			
Stage 8 - Organisational sign Off (to be completed by Chair of Departmental Equalities Task Group) The completed EqIA needs to be sent to the chair of your Departmental Equalities Task Group (DETG) to be signed off.				
21 . Which group or committee considered, reviewed and agreed the EqIA and the Improvement Action Plan?	EqIA Scrutiny Meeting – 4 February 2013			
Signed: (Lead officer completing EqIA)	Amanda Dade	Signed: (Chair of DETG)		
Date:	28.1.13	Date:		