

Section 4 Integrated Impact Assessment

Summary Report Template

Each of the numbered sections below must be completed

Interim report	✓	Final report	
----------------	---	--------------	--

(Tick as appropriate)

1. Title of plan, policy or strategy being assessed

Savings Proposal: Method of attracting Housing Support payments in externally supported accommodation – Older people

2. What will change as a result of this proposal?

To support the delivery of a balanced budget for the 2020/21 financial year the Edinburgh Health and Social Care Partnership has developed a comprehensive Savings Programme. Included within the programme is a proposal to review the method of attracting Housing Support payments in all externally supported accommodation that is provided for older people.

The change: the method of attracting all external housing support arrangements for older adults will come in line with other groups; mental health and disabilities, to provide a fair and consistent approach, from 1st October 2020.

All providers are familiar with the Intensive Housing Management approach for other tenants, and this will be adopted.

This will result in a change to the process for accessing Housing Support payments, . How the support will be delivered, will remain a matter for the experienced providers.

Traditionally housing support function, outwith the Council, attracted funding through the Supporting People mechanism, for supported housing complexes.

Many of the organisations providing traditional sheltered housing, have changed their model of support, ranging from retirement, retirement plus with the provision of meals, to more personalised care and housing support. The key aim of supported accommodation is to encourage independence where

possible, connecting people to their wider communities, and providing support on a personalised basis. The introduction of Self Directed Support, and changes in the welfare system, through Intensive Housing Management has allowed this to happen.

Nationally, the 'supporting people' approach was superseded by Intensive Housing Management, that allows providers to claim for the support they provide on an individual basis, which attracts associated benefits. A combination of self-directed support, (SDS), and Intensive Housing Management (IHM), processes, has allowed personalised care and support for people to be provided. In Edinburgh, this will now be applied for older people as well as people with mental health issues, and disabilities, to provide consistency and fairness.

Six months notice, April – September 2020, will be given to providers, in order that they can make the appropriate alternative arrangements for people that require the ongoing housing support function.

3. Briefly describe public involvement in this proposal to date and planned

A stakeholder session was held on the 10th of February with external providers to discuss the current situation and likely impact of changes. Many of the external providers have reach across Scotland, with it being evident that Edinburgh was one of the few places yet to move to IHM processes for older people. The key themes identified at the stakeholder session were:

- Acceptance of the need to change
- Consistent approach required
- Clarity on what the funding covers
- Sharing good practice

This has been followed up with a number of 1-2-1 meetings with providers directly. These are ongoing at present, with four indicating they are familiar with the IHM process, and a provider who receives significant funding, indicating that this is now the preferred method, and effectively requested for this to occur in Edinburgh.. COVID-19 has prevented the remainder of individual meetings taking place.

4. Date of IIA

18th March 2020

5. Who was present at the IIA? Identify facilitator, Lead Officer, report writer and any partnership representative present and main stakeholder (e.g. NHS, Council)

Name	IIA role	Job Title	Date of IIA training
Katie McWilliam (KMcW)	Lead Officer	Strategic Programme Manager – Older people	2009
Nicky Scally (NS)	Stakeholder rep	Sheltered housing support team leader	
Jenny McCann (JMc)	Facilitator/ Report writer	Programme Manager – Savings Governance	16/03/20
Hazel Stewart (HS)	Note taker	Programme Manager – Transformation	30/01/20
Gosia Szymczak (GS)	Timekeeper/ Note taker	Project Manager – Transformation	30/01/20

6. Evidence available at the time of the IIA

Evidence	Available?	Comments: what does the evidence tell you?
Data on populations in need: <i>Strategic Needs Assessment</i> <i>Provider returns</i>	Yes	Approx 1100 people in external supported accommodation, mainly older people, from all protected characteristic groups excluding young people and children located in urban / semi rural communities. Not everyone in these complexes require housing support, according to recent returns from the providers.
Data on service uptake/access: <i>Internal Audit</i>	Yes	Based on the information gathered from an internal sheltered housing data capture, it is estimated that 20% of tenants do not use housing support function in sheltered accommodation, 60% use the function as and when required, and 20% require intensive housing support.

Evidence	Available?	Comments: what does the evidence tell you?
<i>EHSCP Sheltered housing Support Service Provision</i>		<p>There are EHSCP support service provision standards developed, which outline the services that we can provide through intensive housing management. These are used as good practice guidelines. They provide details of what duties EHSCP has a statutory responsibility to provide via housing support.</p> <p>Proposed changes would mean that the services will still be available to all these tenants, but the process to access them will change, allowing equity of access in line with existing EHSCP services (i.e. disability services)</p> <p>6 months notice, April – September will be provided, in order that providers can make the appropriate alternative arrangements for people that require ongoing housing support.</p>
Data on equality outcomes	No	
<p>Research/literature evidence</p> <p>Scottish Government Private retirement housing: code of practice (2012)</p> <p>Chartered Institute for Housing Scotland: Housing with Care for Older people (2012-2021)</p>	Yes	<p>Best practice guidelines from the Scottish Government and Chartered Institute for Housing Scotland can be found here:</p> <p>https://www.gov.scot/publications/private-retirement-housing-code-of-practice/</p> <p>http://www.cih.org/resources/PDF/Scotland%20Policy%20Pdfs/Older%20People/Housing%20with%20Care%20-%20final%20pdf%20-%20August%202013.pdf</p>
<p>Public/patient/client experience information</p> <p>EHSCP Internal</p>	Yes	<p>People experiences of the internal service were</p>

Evidence	Available?	Comments: what does the evidence tell you?
sheltered housing data capture		gathered via an internal sheltered housing data capture
Evidence of inclusive engagement of service users and involvement findings	Yes	As above
Evidence of unmet need	No	
<p>Good practice guidelines:</p> <p>Scottish Government Private retirement housing: code of practice (2012)</p> <p>Chartered Institute for Housing Scotland: Housing with Care for Older people (2012-2021)</p>		<p>Best practice guidelines from the Scottish Government and Chartered Institute for Housing Scotland can be found here:</p> <p>https://www.gov.scot/publications/private-retirement-housing-code-of-practice/</p> <p>http://www.cih.org/resources/PDF/Scotland%20Policy%20Pdfs/Older%20People/Housing%20with%20Care%20-%20final%20pdf%20-%20August%202013.pdf</p>
Environmental data	No	
Risk from cumulative impacts	No	
<p>Other (please specify)</p> <p>External Housing Support Savings Proposal</p>	Yes	Provides further background to the proposal.
<p>Additional evidence required:</p> <p>1. Intensive Housing Management</p>	Yes	

Evidence	Available?	Comments: what does the evidence tell you?
(IHM) Benefit Processes 2. Clarity on impact of any cross charge to EHSCP through the IHM process when applied		

7. In summary, what impacts were identified and which groups will they affect?

Equality, Health and Wellbeing and Human Rights	Affected populations
<p>Positive</p> <p>Minimal impact on those currently receiving support as they will still receive the housing support required, albeit through a different route.</p> <p>Advance equality of opportunity and increased transparency as the approach is standardised across all groups eligible to receive housing support leading to improved access and quality of services.</p> <p>Reduce differences in status between different groups of people.</p> <p>Negative</p> <p>Provider staff members who undertake multiple functions may be affected. This is a matter for the providers to manage as they claim IHM payments for those eligible.</p>	<p>All those that access housing support , including those with a protected characteristic who may receive the service.</p> <p>All adults with a protected characteristic who may receive the support, but in particular older adults.</p> <p>Provider staff</p>

Environment and Sustainability	Affected populations
<p>Positive</p> <p>N/A</p> <p>Negative</p> <p>N/A</p>	

Economic	Affected populations
<p>Positive</p> <p>Will ensure equitable approach to optimise income and reduce income inequality by supporting everyone (eligible) through the same process to access IHM.</p> <p>Move from block contract to individualised approach will help ensure an individualised and more open approach to the provision of a person's support.</p> <p>Improve quality of and access to services.</p> <p>Negative</p> <p>N/A</p>	<p>All adults with a protected characteristic who may receive the service, but in particular older adults.</p>

8. Is any part of this policy/ service to be carried out wholly or partly by contractors and how will equality, human rights including children's rights , environmental and sustainability issues be addressed?

All of the external housing support provision is delivered by independent companies, who were previously commissioned on a block contract basis. This is shifting to them attracting benefits on an individual basis, with no future contractual arrangement with the Council.

9. Consider how you will communicate information about this policy/ service change to children and young people and those affected by sensory impairment, speech impairment, low level literacy or numeracy, learning difficulties or English as a second language? Please provide a summary of the communications plan.

There will be no change to the individual's eligibility for attracting housing support.

Communication about changes in attracting housing support for people who are eligible is a matter for the external providers, many of whom have already made the changes for other populations; mental health and older people.

10. Does the policy concern agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications, tourism, town and country planning or land use? If yes, an SEA should be completed, and the impacts identified in the IIA should be included in this.

No

11. Additional Information and Evidence Required

If further evidence is required, please note how it will be gathered. If appropriate, mark this report as interim and submit updated final report once further evidence has been gathered.

1. Intensive Housing Management (IHM) Benefit Processes
 - *NS to request process from Moira Cooper within Housing Benefit Team. Required to inform providers of the process when being given notice of the change*
2. Clarity on impact of any cross charge to EHSCP through the IHM process when applied – required to inform the EHSCP financial plan commitments
3. Develop a draft communication for the current providers setting out the changes that will take place.

12. Recommendations (these should be drawn from 6 – 11 above)

It is recommended that the change to process is approved and implemented to allow equity and fairness for those accessing services and providers.

By doing so we will be able to apply a fair and equal process for all our citizens via the IHM route and will be able to safely withdraw the block contract. In turn this will enable us to ensure that person centred support is provided in the same way that it is being provided for Mental Health and Learning Disability tenants.

13. Specific to this IIA only, what actions have been, or will be, undertaken and by when? Please complete:

Specific actions (as a result of the IIA which may include financial implications, mitigating actions and risks of cumulative impacts)	Who will take them forward (name and contact details)	Deadline for progressing	Review date

Specific actions (as a result of the IIA which may include financial implications, mitigating actions and risks of cumulative impacts)	Who will take them forward (name and contact details)	Deadline for progressing	Review date
Understand and calculate any potential charge from Housing Benefit Team (Moirra Cooper) to EHSCP as a result of the move to IHM.	Paul McNulty	July 2020 (Risk that there may be a delay as staff required to complete work are currently involved in command centre for COVID)	August 2020
Obtain and understand IHM Benefit Processes.	Nicky Scally	April 2020	May 2020
Be clear about the referral process from IHM to ensure there is no interruption in the delivery of care.	Nicky Scally	April 2020	May 2020
develop draft communication to providers about the change	Katie McWilliam Alana Nabulsi	end April 2020	May 2020
Unintended consequence for other dept e.g. additional new referrals for housing support, should we do it in house or support internal communication and planning. Consider internal assessments for sheltered housing completed by the sheltered housing service.	Nicky Scally	April 2020	May 2020
Fully understanding external recharges.	Nicky Scally	April 2020	May 2020

14. How will you monitor how this policy, plan or strategy affects different groups, including people with protected characteristics?

Housing benefit colleagues will be able to confirm that systems and process are being equitably applied across all groups with protected characteristics via bi annual updates.

Monitoring of activity, costs and savings will be built into the reporting for the savings and governance programme.

It is currently uncertain what impact COVID-19 will have on the use of the support accommodation for older people and what contingencies may be required to address. It may be that changes are made to the supports by providers which are not currently quantifiable. This will be monitored closely throughout the coming months.

15. Sign off by Head of Service/ Project Lead

Name

Kate McWilliam

Date

6th April 2020

16. Publication

Send completed IIA for publication on the relevant website for your organisation. [See Section 5](#) for contacts.

Section 5 Contacts

- **East Lothian Council**

Please send a completed copy of the IIA to equalities@eastlothian.gov.uk and it will be published on the Council website shortly afterwards. Copies of previous assessments are available via http://www.eastlothian.gov.uk/info/751/equality_diversity_and_citizenship/835/equality_and_diversity

- **Midlothian Council**

Please send a completed copy of the IIA to zoe.graham@midlothian.gov.uk and it will be published on the Council website shortly afterwards. Copies of previous assessments are available via http://www.midlothian.gov.uk/downloads/751/equality_and_diversity

- **NHS Lothian**

Completed IIAs should be forwarded to impactassessments@nhslothian.scot.nhs.uk to be published on the NHS Lothian website and available for auditing purposes. Copies of previous impact assessments are available on the NHS Lothian website under Equality and Diversity.

- **The City of Edinburgh Council**

Completed impact assessments should be forwarded to Strategyandbusinessplanning@edinburgh.gov.uk to be published on the Council website.

- **City of Edinburgh Health and Social Care**

Completed and signed IIAs should be sent to Sarah Bryson at sarah.bryson@edinburgh.gov.uk

- **Edinburgh Integration Joint Board**

Completed and signed IIAs should be sent to Sarah Bryson at sarah.bryson@edinburgh.gov.uk

- **West Lothian Council**

Complete impact assessments should be forwarded to the Equalities Officer.