

# Equality Impact Assessment [version 2.9]



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|---|--|
| Title: Budget Proposal - Concord Lodge                    |  |
| <input checked="" type="checkbox"/> Budget Proposal ASC12 | <input checked="" type="checkbox"/> Changing |
| Directorate: People                                       | Lead Officer name: Sarah Stone               |
| Service Area: Adult Social Care                           | Lead Officer role: Head of Service           |

## Step 1: What do we want to do?

The purpose of an Equality Impact Assessment is to assist decision makers in understanding the impact of proposals as part of their duties under the Equality Act 2010. Detailed guidance to support completion can be found here [Equality Impact Assessments \(EqIA\) \(sharepoint.com\)](#).

This assessment should be started at the beginning of the process by someone with a good knowledge of the proposal and service area, and sufficient influence over the proposal. It is good practice to take a team approach to completing the equality impact assessment. Please contact the [Equality and Inclusion Team](#) early for advice and feedback.

### 1.1 What are the aims and objectives/purpose of this proposal?

Briefly explain the purpose of the proposal and why it is needed. Describe who it is aimed at and the intended aims / outcomes. Where known also summarise the key actions you plan to undertake. Please use [plain English](#), avoiding jargon and acronyms. Equality Impact Assessments are viewed by a wide range of people including decision-makers and the wider public.

**This impact assessment has been developed to accompany cabinet papers concerning the proposal to close the current service operating from Concord Lodge by 31.03.24.**

The service was set up to provide facilities for people with learning disabilities and complex needs to undergo assessment of their needs, and to gain skills to live an independent lifestyle. Over time this purpose has become diluted, and the service is no longer available to people who need this type of short-term intervention. Instead, it is operating as a long-term residential setting. Alongside this, Bristol City Council now commissions services for short term intervention from a range of providers in the independent care sector in Bristol.

The financial challenges the Council are facing are very significant indeed. The council has prioritised the largest part of the annual budget to fund social care, however it remains the case that over a decade of underfunding of social care and local government has led to a funding crisis in the sector. As part of budget setting for 2023-24, the council committed to reviewing Concord Lodge as one of several ways that Adult Social Care can contribute to meeting the financial challenges we face. We will focus our support on those who need us most, and continue delivering for our residents – keeping to our core priorities in the Corporate Strategy.

Concord Lodge provides accommodation for seven adults and six beds are currently occupied. Many of the residents have been there for far longer than the intended 24-36 weeks. All admissions have been paused and there are no plans for investment in the service or the building.

The consultation was open from 12 April 2023 until 30 May 2023. It received 70 responses. The consultation report can be made available as an addendum to cabinet papers.

The recommended option is to cease direct delivery of a council-run service at Concord Lodge, therefore closing the site and meaning that:

- Assessments for adults with learning difficulties or complex needs will no longer be provided by at Concord Lodge and the use of external placements will continue
- Council roles at Concord Lodge will no longer be required and affected council staff will be consulted on what options are available to them

- We will comply with our legal obligation to seek alternative employment for employees at risk of redundancy to mitigate against any compulsory redundancies
- We will continue work with the care provider market to develop the care and support offer within the city for adults with complex needs

## 1.2 Who will the proposal have the potential to affect?

|  |  |  |
|--|--|--|
| <input checked="" type="checkbox"/> Bristol City Council workforce | <input checked="" type="checkbox"/> Service users                  | <input type="checkbox"/> The wider community |
| <input checked="" type="checkbox"/> Commissioned services          | <input type="checkbox"/> City partners / Stakeholder organisations |  |
| Additional comments:   |  |  |

## 1.3 Will the proposal have an equality impact?

Could the proposal affect access levels of representation or participation in a service, or does it have the potential to change e.g. quality of life: health, education, or standard of living etc.?

If 'No' explain why you are sure there will be no equality impact, then skip steps 2-4 and request review by Equality and Inclusion Team.

If 'Yes' complete the rest of this assessment, or if you plan to complete the assessment at a later stage, please state this clearly here and request review by the Equality and Inclusion Team.

|                              |                             |                 |
|------------------------------|-----------------------------|-----------------|
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | [please select] |
|------------------------------|-----------------------------|-----------------|

## Step 2: What information do we have?

### 2.1 What data or evidence is there which tells us who is, or could be affected?

Please use this section to demonstrate an understanding of who could be affected by the proposal. Include general population data where appropriate, and information about people who will be affected with particular reference to protected and other relevant characteristics: <https://www.bristol.gov.uk/people-communities/measuring-equalities-success>.

Use one row for each evidence source and say which characteristic(s) it relates to. You can include a mix of qualitative and quantitative data e.g., from national or local research, available data or previous consultations and engagement activities.

Outline whether there is any over or under representation of equality groups within relevant services - don't forget to benchmark to the local population where appropriate. Links to available data and reports are here [Data, statistics and intelligence \(sharepoint.com\)](#). See also: [Bristol Open Data \(Quality of Life, Census etc.\)](#); [Joint Strategic Needs Assessment \(JSNA\)](#); [Ward Statistical Profiles](#).

For workforce / management of change proposals you will need to look at the diversity of the affected teams using available evidence such as [HR Analytics: Power BI Reports \(sharepoint.com\)](#) which shows the diversity profile of council teams and service areas. Identify any over or under-representation compared with Bristol economically active citizens for different characteristics. Additional sources of useful workforce evidence include the [Employee Staff Survey Report](#) and [Stress Risk Assessment Form](#)

| Data / Evidence Source                                 | Summary of what this tells us  |
|--|--|
| Staff data from iTrent<br>(Unable to include web link) | <ul style="list-style-type: none"> <li>• 25 staff</li> <li>• Age: 46.4% are in the 50-64 age range</li> <li>• Disability: 7.1% are disabled</li> <li>• Ethnicity: 10.7% are non-white</li> </ul> |

|  |   |
|--|---|
|  | <ul style="list-style-type: none"> <li>• Gender: 67.9% are female and 32.1% male</li> <li>• Marital status: very little information provided</li> <li>• Religion/belief: 28.6% are Christian</li> <li>• Sexual orientation: 0% are LGBT (Lesbian, Gay, Bisexual or Trans)</li> <li>• Trans: all answers are either No, Prefer not to state or Unknown</li> </ul> <p>This data tells us a high percentage of the staff are older people and female, these will need to be key considerations when undertaking management of change processes in relation to future employment opportunities.</p>   |
| <p>Anecdotal information about service users<br/>(Unable to include web link)</p>  | <ul style="list-style-type: none"> <li>• 6 people who draw on services at Concord Lodge</li> <li>• Age: 1 young person</li> <li>• Disability: 100% disabled</li> <li>• Ethnicity: 1 Black or Black British and 1 Asian or Asian British</li> <li>• Gender: 5 male and 1 female</li> <li>• Marital status: unknown</li> <li>• Religion/belief: unknown</li> <li>• Sexual orientation: unknown</li> <li>• Trans: unknown</li> </ul> <p>This data tells us that all service users have a protected characteristic of disability, and that one person is a young adult. This will inform how we work with individuals; a person-centred approach will be essential.</p> |
| <p><b>Additional comments:</b> There are no similar services in Bristol, so it is not possible to compare the service with other assessment centres. The service as it stands is an anomaly in the offer for the cohort of people with similar need. Whilst originally intended to operate as an assessment centre, Concord Lodge has not operated in this way in recent years. The service does not hold a waiting list. Referrals are managed through the Adult Social Care brokerage and support planning team. Brokerage have provided the following information; There are currently 35 people waiting for residential care under the age of 65 that present with a combination of complex needs including behaviour that may challenge services. 11 Disabled people with a primary diagnosis of Learning Disability.</p> |   |

## 2.2 Do you currently monitor relevant activity by the following protected characteristics?

|  |   |   |
|--|---|---|
| <input checked="" type="checkbox"/> Age                            | <input checked="" type="checkbox"/> Disability          | <input checked="" type="checkbox"/> Gender Reassignment |
| <input checked="" type="checkbox"/> Marriage and Civil Partnership | <input checked="" type="checkbox"/> Pregnancy/Maternity | <input checked="" type="checkbox"/> Race                |
| <input checked="" type="checkbox"/> Religion or Belief             | <input checked="" type="checkbox"/> Sex                 | <input checked="" type="checkbox"/> Sexual Orientation  |

## 2.3 Are there any gaps in the evidence base?

Where there are gaps in the evidence, or you don't have enough information about some equality groups, include an equality action to find out in section 4.2 below. This doesn't mean that you can't complete the assessment without the information, but you need to follow up the action and if necessary, review the assessment later. If you are unable to fill in the gaps, then state this clearly with a justification.

For workforce related proposals all, relevant characteristics may not be included in HR diversity reporting (e.g., pregnancy/maternity). For smaller teams diversity data may be redacted. A high proportion of not known/not disclosed may require an action to address under-reporting.

Although our corporate approach is to collect diversity monitoring for all relevant characteristics, we have not collected the data for individual service users.

We also know there are some under-reporting gaps in our workforce diversity information - where personal and confidential information is voluntarily requested from staff. This may mean accurate considerations may not be made for some protected characteristic groups, e.g. Trans people

## 2.4 How have you involved communities and groups that could be affected?

You will nearly always need to involve and consult with internal and external stakeholders during your assessment. The extent of the engagement will depend on the nature of the proposal or change. This should usually include individuals and groups representing different relevant protected characteristics. Please include details of any completed engagement and consultation and how representative this had been of Bristol's diverse communities. See <https://www.bristol.gov.uk/people-communities/equalities-groups>.

Include the main findings of any engagement and consultation in Section 2.1 above.

If you are managing a workforce change process or restructure, please refer to [Managing change or restructure \(sharepoint.com\)](#) for advice on consulting with employees etc. Relevant stakeholders for engagement about workforce changes may include e.g. staff-led groups and trades unions as well as affected staff.

- Public Budget Consultation open from Friday 5 November 2022 until Friday 17 December. Budget Consultation 2023 to 2028.
- Public consultation on the future of Concord Lodge from 12 April 2023 until 7 July 2023, accessible through the Bristol City Council website, and available in other formats.
- Consultation questionnaire was available online, as a paper copy and easy read version was made available. It was also available in Braille and languages other than English on request.
- Service users were offered support from carers and advocates to access the version most suitable to their needs. Staff were able to support people to find the consultation online and independent support to complete the questionnaire was available on request from the consultation team if needed.
- Key stakeholders including Adult Social Care teams and the NHS (National Health Services) Integrated Care System, specifically the Community Learning Disability Team were invited by email and in person to contribute to the consultation.
- Residents living locally were made aware of the consultation by letter drop to local addresses.
- Responses were received from residents of Concord Lodge and their loved ones, from colleagues who work at Concord Lodge, as well as from other stakeholders.
- The consultation highlighted a range of views which have been considered as part of the decision-making process.
- The results of the consultation will be published and available to members of the public and stakeholders who care about the future of Concord Lodge.
- The next step is for the results of the consultation to be presented to cabinet who will ultimately decide on the future of Concord Lodge
- The recommendation to be made to cabinet is to close Concord Lodge by the end of March 2024
- We are committed to sharing information transparently and to working with everyone affected to make sure they have the information they need, when they need it
- Once cabinet has met, we will continue to communicate and engage with individuals and to work together on the way forward.

Staff and unions:

- Staff and union consultation will commence later in the year in line with the council's Managing Change Policy if this proposal is approved by Cabinet. A further Equalities Impact Assessment (EqIA) will be completed at this time.

## 2.5 How will engagement with stakeholders continue?

Explain how you will continue to engage with stakeholders throughout the course of planning and delivery. Please describe where more engagement and consultation are required and set out how you intend to undertake it. Include any targeted work to seek the views of under-represented groups. If you do not intend to undertake it, please set out your justification. You can ask the Equality and Inclusion Team for help in targeting particular groups.

- The Bristol City Council Commissioning team are currently working on transformation of care and support provision for adults of working age (including Disabled adults who are autistic and/ or have learning disabilities). They plan for a public engagement exercise in August 2023 on provision of support for adults of working age, this will include looking at creative options for residential and day opportunities services
- There will be a Management of change process with Human Resources to support staff as a group and on an individual basis

- The service has already met the service aim and completed full assessments for all current residents. Each person has an allocated Social Worker or care co-ordinator working with them to source suitable onward placements. Anyone admitted to Concord lodge is required to have an exit plan, so this process is not influenced by the proposed closure, as it was always the intention for the service users to move on to more permanent accommodation.
- Once a suitable placement has been agreed, the service will work closely with each service user and their allocated social worker and other professionals involved in their care and support to ensure an individualised robust and supportive transition plan is put in place and followed.

### Step 3: Who might the proposal impact?

Analysis of impacts must be rigorous. Please demonstrate your analysis of any impacts of the proposal in this section, referring to evidence you have gathered above, and the characteristics protected by the Equality Act 2010. Also include details of existing issues for particular groups that you are aware of and are seeking to address or mitigate through this proposal. See detailed guidance documents for advice on identifying potential impacts etc. [Equality Impact Assessments \(EqIA\) \(sharepoint.com\)](#)

#### 3.1 Does the proposal have any potentially adverse impacts on people based on their protected or other relevant characteristics?

Consider sub-categories (different kinds of disability, ethnic background etc.) and how people with combined characteristics (e.g., young women) might have particular needs or experience particular kinds of disadvantage.

Where mitigations indicate a follow-on action, include this in the 'Action Plan' Section 4.2 below.

#### GENERAL COMMENTS (highlight any potential issues that might impact all or many groups)

Service users – suitable alternative placements will be found that meet the needs of the individuals.

Staff – 7% of staff are disabled, 10.7% are non-white, 46.4% of staff are in the 50-64 age range and 68% are female. All staff will potentially be at risk of redundancy, however suitable alternative roles will be sought through exploration of redeployment options, including allowing reasonable time for training if required for new roles with particular consideration for staff with protected characteristics.

We do not anticipate that this proposal will have any significant impact on the representation of any protected characteristic group in the organisation due to the low number of staff affected. Redundancy will always be the last option considered and every attempt will be made to identify suitable alternative employment opportunities within Bristol City Council.

In line with the Bristol City Council Managing Change Policy, a full Management of Change (MOC) process will be undertaken with dedicated HR support allocated. Staff wellbeing will be paramount to this process, managers will endeavour to create a supportive environment in which all views are welcomed and considered. This Equalities Impact assessment will be reviewed or another completed for the MOC process. Employees and nominated trade union representatives will be notified of the proposals for change and consultation meetings will be held with a view to seeking agreement on the proposals, selection criteria for any workforce reductions and the methods of appointment to redeployment opportunities.

The steps we will undertake are described in the policy - [managing change policy.pdf \(sharepoint.com\)](#).

#### PROTECTED CHARACTERISTICS

|                          |   |
|--------------------------|---|
| <b>Age: Young People</b> | Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input type="checkbox"/>   |
| Potential impacts:       | It may be more difficult to source a suitable placement which meets all the person's needs. The younger person will need specialist support with transitioning to new service.  |
| Mitigations:             | Allocated social worker from the preparing for adulthood team will provide specialist advice and support. A robust transition plan will be put in place and implemented on a timescale which is supportive to the person's needs. |

|                              |   |
|------------------------------|---|
| <b>Age: Older People</b>     | Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>  |
| Potential impacts:           | 46.4% of staff are in the 50-64 age range. It may be more difficult for these staff to find suitable alternative roles.   |
| Mitigations:                 | Every effort will be made to job match affected employees to suitable roles through redeployment. Everyone will be treated as an individual and dedicated HR support will be allocated to the process.  |
| <b>Disability</b>            | Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input type="checkbox"/>   |
| Potential impacts:           | The cohort of service users includes Disabled people with learning difficulties and/or autism – although we do not anticipate any reduction in service, we need to ensure that any changes are managed sensitively with inclusive and accessible communication throughout.<br>The information from iTrent indicates that 7.1% of staff identify as being Disabled. This is anonymised information and managers at the service are not aware of any current staff who have shared their disability status.   |
| Mitigations:                 | From admission to Concord lodge, it is made clear to service users and families that it is a short-term assessment service which will work with them and their social workers to identify and secure more permanent care and support arrangements.<br>Each service user has an allocated social worker and a named keyworker from the service. They will work collaboratively to ensure a suitable onward placement is secured, and that transition planning is robust and supportive.<br>Opportunities will be provided for staff to share their individual situations during a Management of Change process and reasonable adjustments will be considered where identified. |
| <b>Sex</b>                   | Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>  |
| Potential impacts:           | 67.9% of employees are female, potentially placing them at greater risk in the job market, however this is not an unusual situation in a care home setting, the adult social care workforce is predominantly female.  |
| Mitigations:                 | Every effort will be made to job match affected employees to suitable roles through redeployment. Everyone will be treated as an individual and dedicated HR support will be allocated to the process. Bristol City Council has a positive action policy in respect of recruitment and selection to ensure protected groups underrepresented in the workplace are prioritised for suitable roles and this will be applied as appropriate.   |
| <b>Sexual orientation</b>    | Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>  |
| Potential impacts:           |   |
| Mitigations:                 |   |
| <b>Pregnancy / Maternity</b> | Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>  |
| Potential impacts:           | We will assess at the time if any staff are affected  |
| Mitigations:                 | Every effort will be made to job match affected employees to suitable roles through redeployment. Everyone will be treated as an individual and dedicated HR support will be allocated to the process. Bristol City Council has a positive action policy in respect of recruitment and selection to ensure protected groups underrepresented in the workplace are prioritised for suitable roles and this will be applied as appropriate.   |
| <b>Gender reassignment</b>   | Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>  |
| Potential impacts:           |   |
| Mitigations:                 |   |
| <b>Race</b>                  | Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>  |
| Potential impacts:           | 10.7% of the employees are from a non-white background  |
| Mitigations:                 | Every effort will be made to job match affected employees to suitable roles through redeployment. Everyone will be treated as an individual and dedicated HR support will be allocated to the process. Bristol City Council has a positive action policy in respect of recruitment and selection to ensure protected groups underrepresented in the workplace are prioritised for suitable roles and this will be applied as appropriate.   |
| <b>Religion or Belief</b>    | Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>  |
| Potential impacts:           |   |

|   |   |
|---|---|
| Mitigations:  |   |
| <b>Marriage &amp; civil partnership</b>   | Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>  |
| Potential impacts:  |   |
| Mitigations:  |   |
| <b>OTHER RELEVANT CHARACTERISTICS</b>   |   |
| <b>Socio-Economic (deprivation)</b>   | Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>  |
| Potential impacts:  | We do not have data to evidence this; however, the mitigations below will apply   |
| Mitigations:  | Every effort will be made to job match affected employees to suitable roles through redeployment. Everyone will be treated as an individual and dedicated HR support will be allocated to the process. Bristol City Council has a positive action policy in respect of recruitment and selection to ensure protected groups underrepresented in the workplace are prioritised for suitable roles and this will be applied as appropriate. |
| <b>Carers</b>   | Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>  |
| Potential impacts:  |   |
| Mitigations:  | Every effort will be made to job match affected employees to suitable roles through redeployment. Everyone will be treated as an individual and dedicated HR support will be allocated to the process. Bristol City Council has a positive action policy in respect of recruitment and selection to ensure protected groups underrepresented in the workplace are prioritised for suitable roles and this will be applied as appropriate. |
| <b>Other groups</b> [Please add additional rows below to detail the impact for other relevant groups as appropriate e.g., Asylums and Refugees; Looked after Children / Care Leavers; Homelessness] |   |
| Potential impacts:  |   |
| Mitigations:  |   |

### 3.2 Does the proposal create any benefits for people based on their protected or other relevant characteristics?

Outline any potential benefits of the proposal and how they can be maximised. Identify how the proposal will support our Public Sector Equality Duty to:

- ✓ Eliminate unlawful discrimination for a protected group
- ✓ Advance equality of opportunity between people who share a protected characteristic and those who don't
- ✓ Foster good relations between people who share a protected characteristic and those who don't

Service users will move on to suitable alternative provision and more permanent accommodation that will better support them to live independently. The consultation on the future of Concord Lodge provided an opportunity for service users, staff and other stakeholders to have their say on the proposal which was put forward to close the service. Consideration was given to accessibility of information and support and advice was made available to people with protected characteristics throughout the consultation, with the intention of fostering and maintaining good relations with all affected.

## Step 4: Impact

### 4.1 How has the equality impact assessment informed or changed the proposal?

What are the main conclusions of this assessment? Use this section to provide an overview of your findings. This summary can be included in decision pathway reports etc.

If you have identified any significant negative impacts which cannot be mitigated, provide a justification showing how the proposal is proportionate, necessary, and appropriate despite this.

**Summary of significant negative impacts and how they can be mitigated or justified:**

There will be a significant impact for all current service users who are Disabled and some staff who are older and female. These can be mitigated by an individualised approach to engaging with everyone affected and ensuring access to the right support is available when needed.

**Summary of positive impacts / opportunities to promote the Public Sector Equality Duty:**

Service users move on to suitable alternative provision and more permanent accommodation that will better support them to live independently.

## 4.2 Action Plan

Use this section to set out any actions you have identified to improve data, mitigate issues, or maximise opportunities etc. If an action is to meet the needs of a particular protected group, please specify this.

| Improvement / action required  | Responsible Officer | Timescale |
|--|---------------------|-----------|
| FBC (Full Business Case) and cabinet approval  | Sarah Stone         | 05.09.23  |
| Implementation   | Sarah Stone         | 31.03.24  |
| Complete an EqlA for management of change process with staff team if approved by cabinet | Sarah Stone         | 30.09.23  |


## 4.3 How will the impact of your proposal and actions be measured?

How will you know if you have been successful? Once the activity has been implemented this equality impact assessment should be periodically reviewed to make sure your changes have been effective your approach is still appropriate.

Service users will have found and moved on to suitable alternative provision that meets their needs. The work currently being done by the Bristol City Council Commissioning Team to look at services for adults of working age will identify what types of provision best meet the future needs of Bristol Citizens.

## Step 5: Review

The Equality and Inclusion Team need at least five working days to comment and feedback on your EqlA. EqlAs should only be marked as reviewed when they provide sufficient information for decision-makers on the equalities impact of the proposal. Please seek feedback and review from the Equality and Inclusion Team before requesting sign off from your Director<sup>1</sup>.

|  |  |
|--|--|
| <b>Equality and Inclusion Team Review:</b><br><i>Reviewed by Equality and Inclusion Team</i> | <b>Director Sign-Off:</b><br> |
| Date: 10/8/2023  | Date: 25/08/2023   |

<sup>1</sup> Review by the Equality and Inclusion Team confirms there is sufficient analysis for decision makers to consider the likely equality impacts at this stage. This is not an endorsement or approval of the proposal.