

<b>Name of proposal/policy</b>	The future of the Evelyn Wright Older People's care home	<b>Budget number (if applicable)</b>	19-001-05
<b>Service area responsible</b>	NASS	<b>Cabinet meeting date</b>	10 <sup>th</sup> September 2019
<b>Name of completing officer</b>	Katie Brown	<b>Date EqIA created</b>	1 <sup>st</sup> August 2019 Part 2 updated 16 <sup>th</sup> December 2019
<b>Approved by Director / Assistant Director</b>	Anna Earnshaw	<b>Date of approval</b>	29 August 2019 Part 2 approved 16 <sup>th</sup> December
<b>Signed off by NCC Equalities Lead</b>	Emma Gadsby	<b>Date of sign off</b>	29 August 2019 Part 2 signed off 16 <sup>th</sup> December

For sign off by the NCC Equalities Lead, email [egadsby@northamptonshire.gov.uk](mailto:egadsby@northamptonshire.gov.uk) or [equalities@northamptonshire.gov.uk](mailto:equalities@northamptonshire.gov.uk)

The Equality Act 2010 places a 'General Duty' on all public bodies to have 'Due regard' to:

- Eliminating discrimination, harassment and victimisation
- Advancing equality of opportunity
- Fostering good relations

We do this by undertaking equality impact assessments (EqIAs) to help us understand the implications of policies and decisions on people with protected characteristics – EqIAs are our way of evidencing this.

All assessments must be published on the NCC equalities web pages. All Cabinet papers where an EqIA is relevant **MUST** include a link to the web page where this assessment will be published. To have your EqIA published, please contact [equalities@northamptonshire.gov.uk](mailto:equalities@northamptonshire.gov.uk)

## PART A

### 1) Description of current provision/policy and main beneficiaries/stakeholders

Evelyn Wright House is a 35 bedded registered residential care home for older people over 60 who have a physical disability and or dementia. The home is in need of significant capital investment to bring it up to modern standard and fit for future use. NCC directly provides residential care to 29 customers living at Evelyn Wright Care Home in Daventry. 27 customers are funded by NCC, 1 is a self funder and 1 is funded by the NHS through continuing health care.

Due to the current condition of the property 6 places in the upstairs part of the home are already unavailable for use for health and safety and the condition of the home has been a cause of concern for the service and CQC. The service is currently rated overall as “requires improvement” by the CQC following their June 2019 inspection and although it was rated “good” under the categories of effective, caring and responsive and residents and families gave positive feedback it was rated as “requires improvement” under the categories of well led and safe resulting in the overall rating, which included some reflection on the facilities.

The building has now technically reached the end of its economic life. The works detailed below highlight some of the major works required as soon as possible.

- requires substantial works to the roof
- Windows are in poor state of repair and would benefit from replacement
- There is a first floor with 6 bedrooms which is currently not occupied due to the one lift being out of action and beyond economical repair.
- Flooring replacement is required in several areas.
- Water compliance tests show that remedial works will be required and the property would require replacement boilers in the near future.
- The grounds – external rear pathways, overgrown trees and brick built boundary walls require works.

### 2) Description of proposal under consideration/development

Due to the level of capital investment required to make the building compliant and fit for purpose (£800k) a request has been made to cabinet to consult on the future of the service specifically:

- Whether the service should continue to be provided in house by NASS
- Whether the customers should receive support from other commissioned providers and the option of other residential care home provision both new and existing in Daventry should be explored as potential alternative placements for the customers

**3) Data used in this Equality Impact Assessment (general population data where appropriate but each EqIA should contain information on people who use the service under consideration – if this is not applicable to your proposal then you probably do not need to do an EqIA)**

<b>Data Source (include link where published) – quantitative or qualitative</b>	<b>What does this data tell us?</b>
<p>There are currently 29 customers living at Evelyn Wright.</p>	<p>At the time of publishing the Cabinet paper and this EqIA, the exact profile of these customers has been established and careful consideration of individual circumstances have been taken into account to ensure that they are all contacted about the proposals and offered the opportunity to comment (see below for further work for an explanation of the consultation).</p> <p>An updated EqIA will be published when the consultation has been completed and in time for the decision on the proposal by the NCC Cabinet in January 2020.</p> <p>However, with our understanding of the customers supported by the service, we know that the majority of customers have a dementia, with a number living with more than one condition. All have eligible care needs that require the support of residential care. There are more females than males resident at Evelyn Wright.</p>

**4) Please give details about planned consultation or engagement with communities and other stakeholders that are likely to be affected by the policy/decision/service change. Contact the Consultation, Equalities & Accessibility Team ([ceat@northamptonshire.gov.uk](mailto:ceat@northamptonshire.gov.uk)) for advice or complete the online form with details of your consultation/engagement activity.**

**If you are not carrying out any consultation or engagement activity, please provide reasons why you think this is not necessary.**

Customers will be consulted with on an individual basis as will any family members if they request this. This will take place between the 11<sup>th</sup> September – 19<sup>th</sup> November 2019. Interested members of the public will also be able to comment on the proposals via a questionnaire.

5) If consultation or engagement has been carried out in the past, please provide details. If so, what were their views and how have their views influenced the work to date?

In 2016, NCC consulted on the future of the then six care homes operated by Olympus Care Services on behalf of NCC, which included Evelyn Wright. The decision made at that time was to keep Evelyn Wright House open for the short to medium term.

**Protected characteristics as set out in the Equality Act 2010**

6) Based on the above information, what is the likely impact on the following groups? Please explain why you have made this assessment. If you are unsure, set out what you will do to get enough information to make an assessment.

<b>Sex</b>	Impact and explanation	<b>Neutral</b> <b>Explanation: There are currently 21 females and 8 males residing at the service</b>
	Mitigations/actions	In order to understand what impact the introduction of any change might have by virtue of people's sex the proposal will be consulted upon. However it is acknowledged that the proposal will disproportionately affect women as there are more female than male residents.
<b>Gender Reassignment</b>	Impact	<b>neutral</b> <b>Explanation: There is no reason to suggest this will have a particular impact upon people due to gender reassignment.</b>
	Mitigations/actions	In order to understand what impact the introduction of any change might have by virtue of people's gender reassignment, the proposal will be consulted upon.
<b>Age</b>	Impact	<b>negative</b> <b>Explanation: This proposal impacts only on people over the age of 65</b>
	Mitigations/actions	In order to understand what impact the introduction of any change might have by virtue of age, the proposal will be consulted upon. However, due the service being only for people over the age of 65 the initial assessment is that this may impact negatively on the people directly accessing the service. The consultation will establish the extent and how this can be mitigated.
<b>Disability</b>	Impact	<b>negative</b> <b>Explanation: This proposal impacts upon residents who have a physical disability and/or dementia</b>
	Mitigations/actions	In order to understand what impact the introduction of any change might have by virtue of disability, the proposal will be consulted upon. However, due the service being only for people over the age of 65 the initial assessment is that this may impact negatively on the people impacted. The consultation will establish the exact nature.

<b>Race &amp; Ethnicity</b>	Impact	<b>neutral</b> <b>Explanation:</b> There is no reason to suggest this will have a particular impact upon people due to race and ethnicity.
	Mitigations/actions	In order to understand what impact the introduction of any change might have by virtue of people's race and ethnicity the proposal will be consulted upon.
<b>Sexual Orientation</b>	Impact	<b>neutral</b> <b>Explanation:</b> There is no reason to suggest this will have a particular impact upon people due to their sexual orientation.
	Mitigations/actions	In order to understand what impact the introduction of any change might have by virtue of people's sexual orientation, the proposal will be consulted upon.
<b>Religion or Belief (or No Belief)</b>	Impact	<b>neutral</b> <b>Explanation:</b> There is no reason to suggest this will have a particular impact upon people due to their religion or belief.
	Mitigations/actions	In order to understand what impact the introduction of any change might have by virtue of people's religions or beliefs the proposal will be consulted upon.
<b>Pregnancy &amp; Maternity:</b>	Impact	<b>neutral</b> <b>Explanation: n/a</b>
	Mitigations/actions	

### Cross-cutting considerations

**7) Based on the above information, what is the likely impact on the following groups? Please explain why you have made this assessment. If you are unsure, set out what you will do to get enough information to make an assessment.**

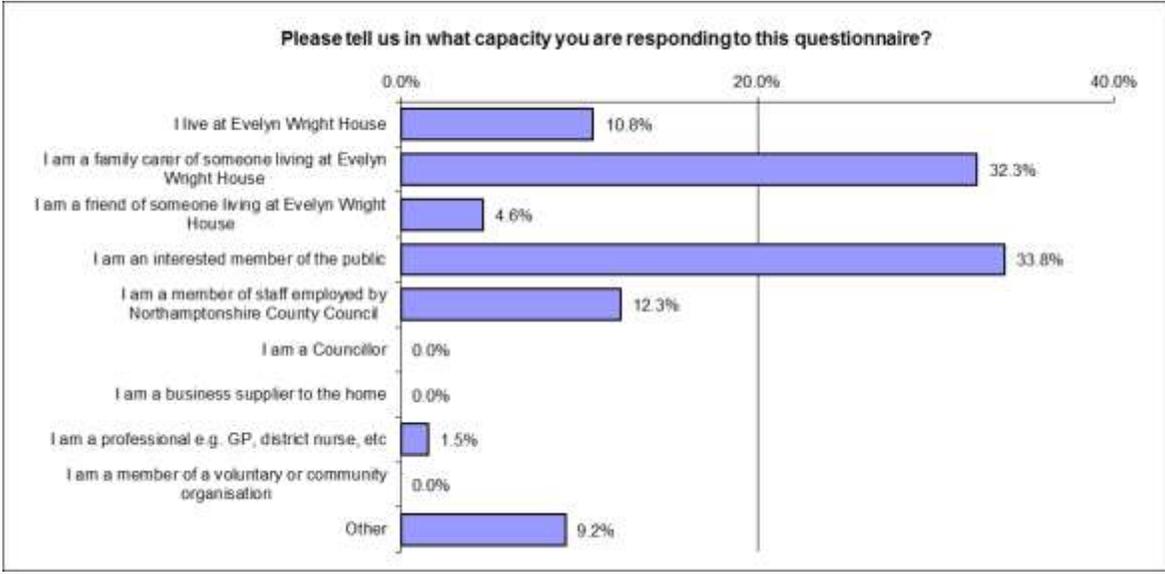
<b>Human Rights – relevant articles:</b> <b>Article 2 – Right to life</b> (e.g. NCC has an obligation to protect the life of vulnerable people from risk of neglect by others) <b>Article 5 – Right to liberty and security</b> (e.g. there must be adequate reasons for detention in situations such as Deprivation of Liberty) <b>Article 8 – Right to private and family life</b> (e.g. relevant when considering family circumstances in child protection)	Impact	<b>Unsure</b> <b>Explanation:</b> In order to understand what impact the introduction of any change might have on people's human rights the proposal will be consulted upon.
	Mitigations/actions	<ul style="list-style-type: none"> <li>• NCC will continue to provide the same standard quality monitoring of care by providers</li> <li>• Deprivation of Liberties/court of protection process will be followed to protect their right to liberty and security</li> <li>• People's right to live near family members will be taken into account.</li> <li>• We have acknowledged that there is a disproportionate impact on people with protected characteristics and this is being addressed in the EqIA and through consultation</li> </ul>

<p><i>cases or when providing social care and recognising the right to refuse medical treatment)</i></p> <p><b>Article 14 – Protection from discrimination</b> (e.g. NCC must not discriminate against one or more protected groups in relation to other rights in the Human Rights Act)</p>		
<p><b>Rural isolation</b></p>	Impact	<p><b>neutral</b>  <b>Explanation: Currently all customers live in an urban town in a residential care home</b></p>
	Mitigations/actions	
<p><b>Socio-economic exclusion</b></p>	Impact	<p><b>Neutral</b>  <b>Explanation: n/a</b></p>
	Mitigations/actions	
<p><b>Health and wellbeing considerations, for example:</b></p> <ul style="list-style-type: none"> <li>• <i>Health behaviours (healthy eating, physical activity, smoking, alcohol)</i></li> <li>• <i>Family, friends and community (social isolation, community safety, mental health, family support)</i></li> <li>• <i>Environment (housing standards, fuel poverty, air pollution, green spaces)</i></li> <li>• <i>Work and education (employment, working conditions, income)</i></li> </ul>	Impact	<p><b>negative</b>  <b>Explanation:</b></p>
	<p>Mitigations/actions  <i>(Can you identify any mitigating actions that can be taken to reduce a negative impact or any actions that can improve a neutral or positive impact?)</i></p> <p>Note: Depending on the scale of the impact identified, there may be a recommendation for a full Health Impact Assessment to be completed.</p>	<p>In order to understand what impact the introduction of any change might have on people’s health and wellbeing the proposal will be consulted upon with every individual currently impacted by the proposal and where appropriate their family and friends.</p> <p>Customers will be informed individually about the consultation, its proposals and the timescales via a letter. The letter will give them the opportunity to have a 1:1 meeting, request a printed questionnaire, where necessary. The consultation will be published on the Council’s Consultation Register and promoted via social media.</p> <p>Response from Public Health:  Due to the nature of the proposal and the options available for the decision on Evelyn Wright House, it is highly recommended that a Health Impact Assessment is carried out. This is based on the initial health and wellbeing information identified in the Equality Impact Assessment and the potential scale of the impact on health and wellbeing.</p> <p>From the options available, there is likely to be an impact on social isolation, family support, area attractiveness and mental health to name a few. It is recommended that</p>

<ul style="list-style-type: none"> <li>• <i>Transport (active travel, public transport, road injury risk, traffic management)</i></li> <li>• <i>Quality and access to care</i></li> </ul>		<p>these are explored further within the Health Impact Assessment. The proposal is likely to impact positively and negatively on many of these factors covered in the Health Impact Assessment template. It is recommended that the Health Impact Assessment is completed in line with the consultation period and prior to the final decision.</p>
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**PART B – if you are undertaking any further work before the decision on this policy or service change is made, please complete Part B and then make a final assessment based on this additional information**

**REMOVE ALL GUIDANCE IN ITALICS ONCE COMPLETED**

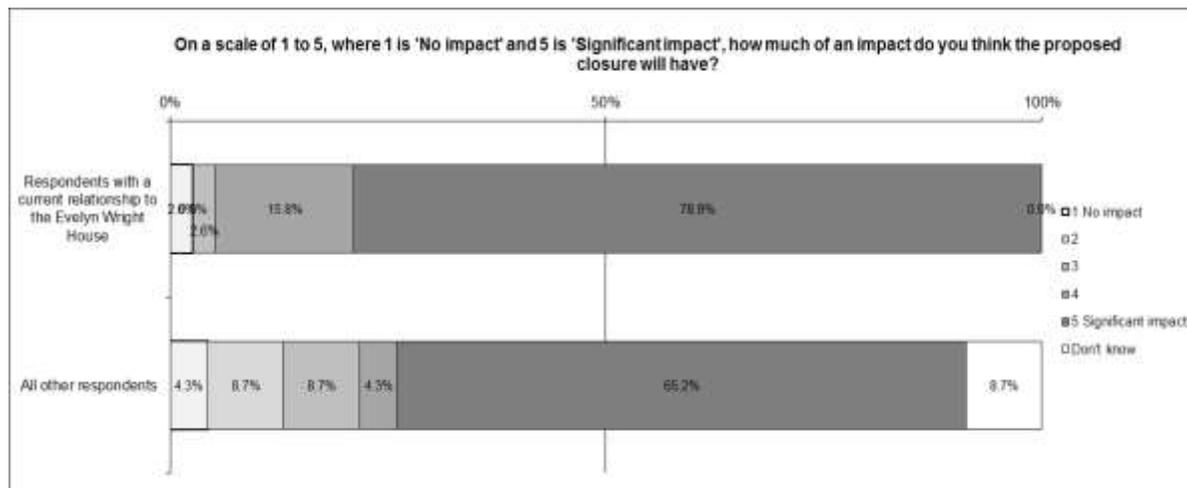
1) Consultation, follow up data and information gathered from actions identified above																							
	What does this information tell us?																						
<p>Due to the breadth of potential stakeholders, a base questionnaire was devised. The questionnaire was designed to:</p> <ul style="list-style-type: none"> <li>• Inform stakeholders of the consultation proposal and what may change.</li> <li>• Gain an understanding of stakeholders’ views of the proposal, and their perceived impact.</li> <li>• Give stakeholders an opportunity to provide comment, including alternative suggestions to that proposed.</li> <li>• Gain an understanding of the demographics of respondents.</li> </ul> <p>The questionnaire was supported by several supporting documents, as outlined below. The questionnaire made reference to the supporting documentation, including the insertion of web links to the following documents:</p>	 <p><b>Please tell us in what capacity you are responding to this questionnaire?</b></p> <table border="1"> <thead> <tr> <th>Capacity</th> <th>Percentage</th> </tr> </thead> <tbody> <tr> <td>I live at Evelyn Wright House</td> <td>10.8%</td> </tr> <tr> <td>I am a family carer of someone living at Evelyn Wright House</td> <td>32.3%</td> </tr> <tr> <td>I am a friend of someone living at Evelyn Wright House</td> <td>4.6%</td> </tr> <tr> <td>I am an interested member of the public</td> <td>33.8%</td> </tr> <tr> <td>I am a member of staff employed by Northamptonshire County Council</td> <td>12.3%</td> </tr> <tr> <td>I am a Councillor</td> <td>0.0%</td> </tr> <tr> <td>I am a business supplier to the home</td> <td>0.0%</td> </tr> <tr> <td>I am a professional e.g. GP, district nurse, etc</td> <td>1.5%</td> </tr> <tr> <td>I am a member of a voluntary or community organisation</td> <td>0.0%</td> </tr> <tr> <td>Other</td> <td>9.2%</td> </tr> </tbody> </table>	Capacity	Percentage	I live at Evelyn Wright House	10.8%	I am a family carer of someone living at Evelyn Wright House	32.3%	I am a friend of someone living at Evelyn Wright House	4.6%	I am an interested member of the public	33.8%	I am a member of staff employed by Northamptonshire County Council	12.3%	I am a Councillor	0.0%	I am a business supplier to the home	0.0%	I am a professional e.g. GP, district nurse, etc	1.5%	I am a member of a voluntary or community organisation	0.0%	Other	9.2%
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- [September 2019 Cabinet Paper](#)
- [Equality Impact Assessment \(EqIA\) which was published as an appendix to the September Cabinet Paper](#)
- [Frequently Asked Questions \(FAQs\)](#)

A number of qualitative and quantitative questions were asked to gain an understanding of respondents' views. Respondents were asked to read the supporting documentation prior to answering the questionnaire.

All potentially affected customers and/or their families and carers were written to and advised of the proposal and invited to participate in the consultation. They were also offered an individual meeting with NASS officers, to allow these customers the opportunity to respond to the consultation directly with an officer and to discuss any concerns or questions which they may have. A total of 20 respondents were supported via this method to provide their feedback.

Details of the consultation and a web link to the online questionnaire were also circulated electronically to the individuals and organisations signed up to receive notification of the Council's consultations, which includes County Councillors; local MPs; District, Borough and Parish Councils; and to all of the 1,000+ members of the county's Residents' Panel. The consultation was also promoted to third sector organisations, health partners, and other identified stakeholders.



The respondents who have a current relationship with Evelyn Wright House and felt it would have a significant impact mentioned various reasons. The most frequent reason given was concern regarding the residents being unable to manage the significant change of moving home. It was expressed that the elderly, especially those with conditions such as dementia, find it harder than most to adjust to change.

A similar number of respondents commented on Evelyn Wright House's location within Daventry, with some respondents stating that they initially chose to live in the care home based on its location and proximity to their family. Respondents commented on how some family members of residents do not drive and mentioned the convenience of the current location meaning travelling to the home is possible via walking. Several family respondents mentioned that as they do not have access to a car, any relocation of residents that was further away raised concerns that they would not be able to visit them as frequently, especially elder family members. It was strongly felt by several respondents that if residents were to be moved then they should relocate within close proximity to the local area.

<p>The consultation was publicised via Northamptonshire County Council's Facebook, Twitter and other social media accounts. Respondents were given the opportunity to participate through these social media sites, although no direct responses were received or could be attributed via this method.</p> <p>An email address and telephone number was published to help respond to queries or receive feedback.</p> <p>A total of 74 questionnaire responses were received, generating feedback that included some 211 comments from the different groups of respondents.</p> <p>In addition to the questionnaire feedback two written submissions were received.</p>	<p>A few respondents raised their concern that they felt Daventry was lacking in suitable alternative accommodation and were fearful residents would be forced to move to other places across the county where vacancies were available.</p> <p>Other comments included requests to know what options are available for residents; the need for alternative accommodation to be suitable for the residents' needs; and that individuals' care requirements must be taken into account.</p>
	<p>When respondents were asked if they had an alternative approach for the future of Evelyn Wright House that they would like NASS to consider, 54.5% of the 55 respondents who answered this question said they did have an alternative approach.</p> <p>The most frequent comments received were from respondents who want to have an informed decision about where residents may move to should Evelyn Wright House close. Respondents want information about their options and to be able to have a choice as to where residents may be relocated. They want to be able to consider several alternative care homes of their preference, with some already investigating possible venues.</p> <p>A similar number of respondents raised their concerns regarding what they felt was a lack of suitable alternative accommodation within the local area, and cited previous reductions in services, for example the closure of The Grange care home. It was commented that the local population is increasing and the view that services are not keeping pace, and that the closure of Evelyn Wright House would only increase this pressure. Some respondents said new build</p>

care homes have been promised but these have not yet been built. Again it was commented by some respondents for their preference to remain within Daventry.

Several respondents said their preference would be for Evelyn Wright House to be refurbished. These respondents felt this would provide the best outcome for the residents. It was suggested that this could be done in phases to help reduce disruption to residents. Another suggestion was to invest in the repair of the main areas of concerns so residents can remain within the home in the interim until a new care home is built for them to relocate to together.

A similar number of respondents commented on the need for the continuation of good quality care support and the continuity of staff.

The importance of keeping families and friends together during any potential relocation was again highlighted by several respondents.

A few respondents said they were fearful they would have to pay more for the cost of care should an alternative care home cost more to live in than Evelyn Wright House.

**Protected characteristics as set out in the Equality Act 2010 – see Part A for explanations and guidance**

**2) Based on the above information, what is the likely impact on the following groups? Please explain why you have made this assessment. If you are still unsure, please explain what you plan to do in future to address this.**

<b>Sex</b> <i>Refer back to Part A for detail</i>	Impact	<b>Negative</b>
	Mitigations/actions	<b>Explanation: There are currently females 14 and 7 males residing at the service</b> <ul style="list-style-type: none"> <li>All customers and families will be given a choice on any alternative provision</li> <li>Everyone wishing to remain in the Daventry area will be able to do so</li> <li>Individual family circumstances will be taken into account to ensure that there is minimal impact to social isolation.</li> <li>Individual care and support needs will be taken into account and an assurance that any new provision will be able to meet customers needs</li> </ul>
<b>Gender Reassignment</b>	Impact	<b>Neutral</b>

<i>Refer back to Part A for detail</i>		<b>Explanation:</b> There was no evidence during the consultation to suggest this will have a particular impact upon people due to gender reassignment
	Mitigations/actions	
<b>Age</b> <i>Refer back to Part A for detail</i>	Impact	<b>Negative</b> <b>Explanation:</b> Due the service being only for people over the age of 65 this proposal does impact negatively on older people.
	Mitigations/actions	<ul style="list-style-type: none"> <li>• All customers and families will be given a choice on any alternative provision</li> <li>• Everyone wishing to remain in the Daventry area will be able to do so</li> <li>• Individual family circumstances will be taken into account to ensure that there is minimal impact to social isolation.</li> <li>• Individual care and support needs will be taken into account and an assurance that any new provision will be able to meet customers needs</li> </ul>
<b>Disability</b> <i>Refer back to Part A for detail</i>	Impact	<b>negative</b> <b>Explanation: This proposal impacts upon residents who have a physical disability and/or dementia</b>
	Mitigations/actions	<ul style="list-style-type: none"> <li>• All customers and families will be given a choice on any alternative provision</li> <li>• Everyone wishing to remain in the Daventry area will be able to do so</li> <li>• Individual family circumstances will be taken into account to ensure that there is minimal impact to social isolation.</li> <li>• Individual care and support needs will be taken into account and an assurance that any new provision will be able to meet customers needs</li> </ul>
<b>Race &amp; Ethnicity</b> <i>Refer back to Part A for detail</i>	Impact	<b>Positive / neutral / negative / unsure (delete as appropriate)</b> <b>Explanation:</b> There was no evidence during the consultation to suggest that this proposal will have an impact on people due to their race and ethnicity.
	Mitigations/actions	
<b>Sexual Orientation</b> <i>Refer back to Part A for detail</i>	Impact	<b>Neutral</b> <b>Explanation:</b> There was no evidence during the consultation to suggest that this proposal will have an impact on people due to their sexual orientation
	Mitigations/actions	
<b>Religion or Belief (or No Belief)</b> <i>Refer back to Part A for detail</i>	Impact	<b>neutral</b> <b>Explanation:</b> There was no evidence during the consultation to suggest this proposal will have any impact of people due to their religion or beliefs.
	Mitigations/actions	
<b>Pregnancy &amp; Maternity</b>	Impact	<b>Not applicable</b>

<i>Refer back to Part A for detail</i>		<b>Explanation:</b>
	Mitigations/actions	

**Cross-cutting considerations – see Part A for explanations and guidance**

<b>3) Based on the above information, what is the likely impact on the following groups? Please explain why you have made this assessment. If you are still unsure, please explain what you plan to do in future to address this.</b>		
<b>Human Rights (Please see articles in the toolkit for more information)</b> <i>Refer back to Part A for detail</i>	Impact	<b>neutral</b>
	Mitigations/actions	<b>Explanation:</b> <ul style="list-style-type: none"> <li>NCC will continue to provide the same standard quality monitoring of care by providers</li> <li>Deprivation of Liberties/court of protection process will be followed to protect their right to liberty and security</li> <li>People’s right to live near family members will be taken into account.</li> <li>We have acknowledged that there is a disproportionate impact on people with protected characteristics and this is being addressed in the EqIA and through consultation</li> </ul>
<b>Rural isolation</b> <i>Refer back to Part A for detail</i>	Impact	<b>Neutral</b>
	Mitigations/actions	<b>Explanation: Currently all customers live in an urban town in a residential care home</b>
<b>Socio-economic exclusion</b> <i>Refer back to Part A for detail</i>	Impact	<b>Neutral</b>
	Mitigations/actions	<b>Explanation:</b> There was no evidence during the consultation that this proposal has any impact on socio economic exclusion. <ul style="list-style-type: none"> <li>Customers will not be expected to pay more than they are currently paying providing that the alternative placement is within the costs that NCC would ordinarily pay for the placement.</li> </ul>
<b>Health and wellbeing considerations</b> <i>Refer back to Part A for detail</i>	Impact	<b>negative</b>
	Mitigations/actions	<b>Explanation:</b> The consultation has highlighted the potential impact on customers health and wellbeing <ul style="list-style-type: none"> <li>All customers and families will be given a choice on any alternative provision</li> <li>Transition plans will be determined on an individual basis</li> <li>A sufficient enough timescale will be given for customers and their families to look at alternative services.</li> <li>Everyone wishing to remain in the Daventry area will be able to do so</li> </ul>

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|--|--|---|
|  |  | <ul style="list-style-type: none"> <li>• Individual family circumstances will be taken into account to ensure that there is minimal impact to social isolation.</li> <li>• Individual care and support needs will be taken into account and an assurance that any new provision will be able to meet customers needs</li> </ul> |
|--|--|---|

#### 4) Final impact analysis (taking the findings from Part B into account) – including review date if required

It is clear from the consultation and from the completion of the EQIA that there are potential significant impacts on the customers implicated by this proposal. The following mitigating actions will be undertaken:-

- All customers and families will be given a choice on any alternative provision
- Everyone wishing to remain in the Daventry area will be able to do so
- Individual family circumstances will be taken into account to ensure that there is minimal impact to social isolation.
- Individual care and support needs will be taken into account and an assurance that any new provision will be able to meet customers needs
- NCC will continue to provide the same standard quality monitoring of care by providers
- Deprivation of Liberties/court of protection process will be followed to protect their right to liberty and security
- People's right to live near family members will be taken into account.

The reasons why alternative suggestions are not possible are:-

- It is not feasible due to costs and level of work required to keep the service open. This includes moving the customers out whilst work is undertaken, this is due to the potential disruption of moving customers twice. It is also not safe or possible for the building to be renovated in stages to allow customers to remain on site if there was agreement for the work to be done.