



Equality Screening

Housing with Care Options Review – Options for De la Cour House, Belfast

September 2021

Clanmil Housing Group

Whilst Clanmil is an independent housing provider and charity, it is also a designated public authority under Section 75 of the Northern Ireland Act, 1998, for the purposes of Housing with Care.

Clanmil has a statutory duty to screen. This includes our strategies, plans, policies, legislative developments; and new ways of working such as – the introduction, change or end of an existing service, grant funding arrangement or facility. This seeks to consider the likely equality impacts of their proposed decisions on different groups of customers, service users, staff and visitors.

Section A

Details about the policy / decision to be screened

Title of policy / decision to be screened: -

Housing with Care Options Review – De la Cour House, Belfast.

Brief description of policy / decision to be screened: -

The Board of Clanmil has decided to commence a Pre-consultation on seven options to assess the future provision of care and support services at Clanmil's three Housing with Care Homes: Marriott House, Magherafelt, Giboney House and De la Cour House, both in Belfast. This screening assesses those seven options in respect of De la Cour House, Belfast.

Aims and objectives of the policy / decision to be screened: -

A review of the service and its financial viability has been undertaken proposing seven potential options around the future strategic relevance and direction of the service.

Clanmil's Board of Management has agreed on seven potential options to consider on the future of the homes. The options are: -

1. Status Quo maintained
2. Status Quo maintained but Trust increases payments
3. Expansion of HWC service in Clanmil
4. Closure (providing 3 months minimum notice
5. Wind down over a number of years (e.g. 2 years)
6. Alternative providers of HWC service
7. Repurposing of existing service (to alternative older people's accommodation or services/ merger of existing services.

The aim of the options review is to seek to give due regard to various options for the future of the three Housing with Care homes operated by Clanmil. This screening exercise seeks to provide information to identified stakeholders on the reasons for the consultation and to invite relevant information and views on the options that are to be considered. Information will be provided in a format to help, where possible, to exercise choice, control and support residents and families. The stakeholders include residents, families, staff and other external stakeholders with an interest in the business, such as Belfast HSC Trust, NISCC, RQIA, Older People groups etc.

On whom will the policy / decision impact?

- Residents of the Home
- Colleagues working at each Home
- Families of those living in De la Cour House
- Colleagues elsewhere in the business

Are there linkages to other Agencies/ Departments?

Other external agencies linked to the consultation include Northern Health & Social Care Trust Regulation & Quality Improvement Authority (RQIA), Northern Ireland Social Care Council (NISCC), Department for Communities and Trade Union Representatives.

There are also internal links internally within the organisation, HR, Finance and Assets in addition to Housing Management who all provide support services to each home.

Section B

1. Outline consultation process achieved or planned.

The pre-consultation period will run for a period of 12 weeks from 14th September to 7th December 2021. A series of meetings will be held with residents, families, and advocates on a one-to-one basis. Multiple meetings with residents, families and advocates will be facilitated if required. Meetings with colleagues will also be planned on a one-to-one basis. In addition, each resident and staff will be written to, setting out the process and inviting feedback.

External stakeholders and elected representatives will be written to, setting out the current position and process with a dedicated email address to provide feedback as well as a specific point of contact to respond to queries etc.

Clanmil will welcome feedback from any interested party, including those who may not be included on the initial consultee list.

Proposed dates to consult staff- 12 weeks for pre-consultation

Residents and their families

Clanmil colleagues

Elected Representatives

Gavin Robinson MP

Naomi Long MLA

Chris Lyttle MLA

Andy Allen MLA

Robin Newton MLA

Joanne Bunting MLA

Belfast HSC Trust

RQIA

Age NI

Commissioner for Older People NI

Alzheimer's Society

Linen Court Surgery

Woodstock Surgery

Cherryvalley Health Centre

Victoria Health Centre

Willowfield Health Centre

Trade Unions

Disability Action

Patient & Client Council

Northern Ireland Social Care Council

Association for Real Change

Available evidence

What evidence / information (both qualitative and quantitative) have you gathered to inform this policy? Set out all evidence below to help inform your screening assessment. Please note: It is important to record information gathered from a variety of sources such as:

- Monitoring information
- Complaints
- Research /surveys
- Consultation exercise and other public authorities

Section 75 category	Details of evidence / information and engagement
Religious belief	<p>Information gathered at the commencement of residency or employment.</p> <p>Residents: -</p> <p>De la Cour House: - 100% Protestant</p> <p>Staff: -</p> <p>De la Cour House: - 12% Catholic 65% Protestant 23% Not Disclosed</p>
Political opinion	<p>Political opinion of residents is not routinely gathered at commencement of residency. However religious belief could be used as a proxy. It is assumed based on the religious belief that the residents would be a majority PLU.</p> <p>Political opinion of staff is not collected.</p>
Racial group	<p>All residents and staff in the Homes are White – UK/Irish or Other Nationalities.</p>
Age	<p>Each care home is designated to provide care and support for older people. The care and support service reflects the increased frailty and disabilities of people as they get older, therefore needing higher levels of support to live within a Housing with Care setting. The oldest resident living with us at the time of writing is 100 years of age, the youngest 72 years of age.</p> <p>Clanmil therefore believes that there would be a disproportionate impact on older people if options 4 or 5 were progressed.</p>
Marital status	<p>No resident of De la Cour House has a living spouse. Marital status is gathered at sign up of residency or commencement of employment.</p> <p><u>De la Cour House Staff</u></p> <p>Married: - 18%</p> <p>Married/Civil Partnership: - 6%</p> <p>Not Specified 59%</p> <p>Separated: 6%</p> <p>Single: - 12%</p>
Sexual orientation	<p>Clanmil is not aware of any resident of De la Cour House being a member of the LGBTQ+ community. Sexual orientation is voluntary information gathered at sign up of residency or commencement of employment and has not been provided by colleagues.</p>

Men & women generally	<p>The majority of residents living at De la Cour are female (86% female 14% male)</p> <p>Staff are also majority female in the Home. 82% (14) are female and 18% male (3).</p> <p>Clanmil therefore anticipates that there is likely to be an adverse effect on women if options 4 or 5 were taken forward.</p>
Disability	<p>At time of writing there are 8 people living at De la Cour House. All 8 of whom identify as disabled. In addition, 3 people are also living with a diagnosis of dementia.</p> <p>Disability is voluntary information gathered at sign up of residency or commencement of employment. It is also compiled for residents via care planning. Clanmil therefore anticipates that there is likely to be an adverse effect on disabled people if options 4 or 5 were taken forward.</p>
Dependents	<p>All relevant contact details for residents will be reviewed and checked for accuracy and monitored to ensure contact is relevant and appropriate.</p>

2. What is the likely impact (indicate if the policy impact is positive or negative) on equality of opportunity for those affected by this policy, for each of the Section 75 equality categories? What is the level of impact?

Section 75 category	Likely impact?	Level of impact? Minor/Major/None
Religious belief	<p>Given the location of De la Cour House, in East Belfast it is expected that most residents are members of the Protestant community.</p> <p>In respect of staff at De la Cour House: - 65% are Protestant, 24% not disclosed and 11% are Catholic.</p> <p>There will be some disproportionate impact on members of the Protestant community however, this is reflective of the local make- up.</p>	

Political opinion	There is no impact on political opinion as the pre-consultation process will not disadvantage anyone based on their view. MP and MLAs for the constituency will be included in the consultee list.	
Racial group	<p>Residents at De la Cour House are all white.</p> <p>There is no impact on racial group as the pre-consultation process will not disadvantage anyone based on racial group.</p> <p>Staff: - 17% withheld 47% white UK/Irish 12% white other 24% not specified</p>	
Age	<p>Each care home is designated to provide care and support for older people. The care and support service reflects the increased frailty and disabilities of people as they get older, therefore needing higher levels of support to live within a Housing with Care setting. It can be confirmed therefore that there will be a disproportionate impact on older people when in respect of those living within our homes. The oldest resident living with us at the time of writing is 100 years of age, the youngest 75 years of age.</p> <p>It is anticipated that there will be significant impact on older people given the demographics of client group. We recognise that those residents of very advanced age may find adaptation to change and stress more difficult. To support there will also be advocacy in place for people on request or who are identified as requiring independent advocacy.</p> <p>All communications will be undertaken using methods the residents understand. The welfare of the residents is a priority. They will be given every opportunity to ask questions and will be assured that all has been done to ensure their safety and comfort.</p> <p><u>Staff</u> <u>Age 21-30: 10%</u> Age 31 -40: -24% Age 41-50: - 24% Age 51-60: - 24% Age 60 plus: - 18%</p>	
Marital status	No disproportionate impact has been identified in terms of marital status of residents.	

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Sexual orientation	No disproportionate impact has been identified in terms of sexual orientation.	
Men and women generally	<p>At De la Cour House there are seven women and one man living here.</p> <p>There are fourteen women working at De la Cour House and three men.</p> <p>For both residents and staff women are most likely to be disproportionately affected and in terms of staff they are most likely to have some element of caring responsibility / dependent outside of the workplace.</p>	
Disability	<p>For residents its anticipated that there will be disproportionate impact on people with disabilities. To support this the pre-consultation process will include access to independent advocacy as well as support from the local Health Trusts, for example social worker or key worker to support them through the consultation process.</p> <p>We are aware that impairment to the facility to understand, comprehend, remember and reason with the information may make certain individuals more vulnerable. An independent advocacy service has been secured to support those who may need or wish to avail of it.</p> <p>None of the staff working at the home has a disability.</p>	
Dependents	<p>None of the people living within our homes have dependents therefore we anticipate that there will not be an impact on this group.</p> <p>There could be impact on family members if they decide that they want their loved one to move home with them. In terms of supporting this the Trust will be available to look at what mitigation can support this such as care packages, floating support etc.</p> <p>There could also be an impact on family members if option 4 or 5 were progressed and their loved one</p>	

	<p>moved further away from De la Cour House. To mitigate there would be support in place from Clanmil and the Trust to ensure any potential moves, are appropriate.</p> <p>Details of staff members with dependents have not been collected. However, it is assumed that given the majority of the workforce at De la Cour House are women, there is a likelihood that they may have dependents.</p>	
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3. Are there opportunities to better promote equality of opportunity for people within the Section 75 equalities categories?

Section 75 category	If Yes, provide details	If No, provide reasons
Religious belief		Policy will be applied regardless of religious belief.
Political opinion		Policy will be applied regardless of political opinion.
Racial group		Policy will be applied regardless of racial group.
Age	<ul style="list-style-type: none"> • If options 4 & 5 are pursued, Clanmil will work closely with BHSCT to support residents and families to move to suitable alternative accommodation/services e.g., through reassessment process. The safety of our residents and colleagues will remain a priority. High quality care and support would be offered throughout any transition process to achieve the best possible outcomes for individual residents. • The Association is mindful and aware of the potential distress to residents and families. If 	Policy will be applied regardless of age.

	<p>there was a decision to close the home, each resident will have an individualized, person centered, moving on plan to establish continuity of care and ensure health, safety and well- being of the resident.</p> <ul style="list-style-type: none"> • Option 5 (wind down) and 7 (repurposing) would provide a longer period of time than option 4 (closure with notice only) to facilitate longer planning of move and a transition for residents to a suitable new home • Clanmil to fund and make available and independent advocacy service for residents to engage with pre-consultation and any related discussions (including with Clanmil and with Trust) • Clanmil will consult with Older People's Commissioner and Age NI as identified stakeholders to ensure that there is opportunity to provide professional feedback and input into the process. 	
Marital status		Policy will be applied regardless of marital status.
Sexual orientation		Policy will be applied regardless of sexual orientation.
Men and women generally	<p>For residents there will be full advocacy in place to support people with making any decisions around, providing feedback to the consultation, options and possible decisions about their own accommodation and support options.</p> <p>For staff we would seek to include redeployment opportunities within the Association or other providers, depending on the outcome of the process as well as suitable employment options with other providers under the regulations.</p>	Policy will be applied regardless of gender.
Disability	Clanmil to fund and make available and independent advocacy service for residents to engage with pre-consultation and any related discussions (including with Clanmil and with Trust)	Policy will be applied regardless of disability.

	Prior to and during the process there will be openness and transparency. Attention to communication and information dissemination will be identified as a priority.	
Dependents	Clanmil will engage with families of residents to ensure options are explained and views sought; and will support families of residents without capacity through assessment process.	Policy will be applied regardless of dependents status.

4. To what extent is the policy likely to impact (positive or negatively) on good relations between people of different religious belief, political opinion or racial group? What is the level of impact?

Good relations category	Likely impact?	Level of impact? Minor/Major/None
Religious belief	No impact	No impact at this stage
Political opinion	No impact	No impact at this stage
Racial group	No impact	No impact at this stage

5. Are there opportunities to better promote good relations between people of different religious belief, political opinion or racial group?

Good relations category	If Yes, provide details	If No, provide reasons
Religious belief	None identified to date	No impact at this stage
Political opinion	None identified to date	No impact at this stage
Racial group	None identified to date	No impact at this stage

Section C

Clanmil Housing also has legislative obligations to meet under the [Disability Discrimination Order](#) and Questions 6 - 7 relate to these two areas.

Consideration of Disability Duties

6. Does this proposed policy / decision provide an opportunity for Clanmil to better **promote positive attitudes** towards disabled people?

The pre consultation is for all residents and staff involved in De la Cour House.

The pre consultation will set out clearly the options to be considered in respect of reprovion which could include alternative services for disabled groups.

To provide additional support, independent from both Clanmil and the Health Trust, Clanmil will be sourcing an advocacy service to residents who are identified as requiring it or choose to avail of the service.

The needs of residents will be at the heart of everything we do and their choices will be supported, placed at the centre of the process and kept safe throughout.

7. Does this proposed policy / decision provide an opportunity to actively **increase the participation** by disabled people in public life?

The pre-consultation is for all residents and staff, advocates and stakeholders.

The pre-consultation will set out clearly the options to be considered in respect of reprovion.

Monitoring Arrangements

Section 75 places a requirement the Clanmil to have equality monitoring arrangements in place in order to assess the impact of policies and services etc; and to help identify barriers to fair participation and to better promote equality of opportunity.

Outline what data you will collect in the future in order to monitor the impact of this policy / decision on equality, good relations and disability duties.

Equality	Good Relations	Disability Duties
<p>Internal monitoring arrangements are in place to collect equality information for staff as follows:</p> <p>Annual Fair Employment Return to the Equality Commission for Northern Ireland.</p> <p>Article 55 Reviews.</p> <p>Annual Staff Update Surveys</p> <p>Labour Turnover statistics.</p> <p>Feedback from Exit Interviews.</p> <p>Flexible working requests.</p> <p>Register of uptake of work life balance options.</p> <p>Register of transfer requests.</p> <p>Occupational Health Referrals.</p> <p>Sickness Absence statistics. Monitoring of internal staff complaints in relation to Grievances, complaints under the Equality & Diversity Policy.</p> <p>Analysis of leavers – reasons for leaving and membership of the 9 groups</p> <p>Staff Well-Being Survey results.</p>	<p>We will review all the information outlined as per the Equality Section outlined to the left</p>	<p>We will review all the information outlined as per the Equality Section as well as our 5-year Disability Action Plan</p>

Section D

Formal Record of Screening Decision

Title of Proposed Policy / Decision being screened

Housing with Care Options Review – Options for De la Cour House, Belfast.

I can confirm that the proposed policy / decision has been screened for –

x	equality of opportunity and good relations
x	disabilities duties

On the basis of the answers to the screening questions, I recommend that this policy / decision is –

*place an X in the appropriate box below

<input type="checkbox"/>	* <u>Screened In</u> – Necessary to conduct a full EQIA
<input checked="" type="checkbox"/>	* <u>Screened Out</u> – No EQIA necessary (no impacts) At this stage of pre- consultation, the process has been screened out. However, depending on the outcome of this process further screening will be required to determine impact on the equality, good relations and disability and may result in a full EQIA being required.
<input type="checkbox"/>	* <u>Screened Out</u> - Mitigating Actions (minor impacts)

Formal Record of Screening Decision (cont)

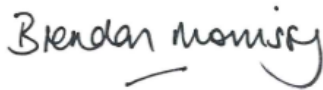
Screening assessment completed by (Officer level) -

Name: Brendan Morrissey

Date: 27 August 2021

Department: Housing Management

Signature: please insert a scanned image of your signature below

A handwritten signature in black ink that reads "Brendan Morrissey". The signature is written in a cursive style with a horizontal line underneath the name.

Screening decision approved by -

Name: Pól Callaghan, Executive Director
of Housing & Customer Experience

14th September 2021

Signature: please insert a scanned image of your signature below

Signature:

A handwritten signature in black ink, consisting of a stylized, abstract shape that appears to be the initials "PC" or a similar representation of the name Pól Callaghan.

The screening form will be placed on the website and a link provided to the Association's Section 75 consultees.