

Coventry City Council Equality and Consultation Analysis (ECA) Form

In line with the principles of decision making outlined in the City Council Constitution, the Council will ensure that its decision making is open and transparent, and that due regard is given to the Council's obligations and desire to promote equality of opportunity and equal treatment.

Part 1

This part must be completed and before formal consultation is undertaken and must be available during the consultation stage.

Author of this document: Julie Kendall

Name of Service Area/Proposal: Supported Accommodation

Head of Service: Sally Giles

Date of completion: 28.11.18

Reviewed 4 March 2019

Background to the planned changes

1. What is the background to the planned changes? Why is this change being considered? *If further information is available on the different scenarios that have been considered as part of this work, provide a link to the public document which contains this information.*

Supported accommodation services provide accommodation and support to young people aged 16 – 24 years who are homeless, vulnerable and unable to live independently. The young people in these services are amongst some of the most vulnerable in the city and may have a range of needs relating to substance misuse, mental health, unemployment and low skills, sexual exploitation, or youth offending. Some of them will have been through the care system, or they or their families may have been in receipt of preventative or other council services. Some do not reach the threshold for adult services, yet require significant help and support in order to be able to live independently and access employment or training.

The City Council has a statutory duty to provide accommodation to persons under 18 who have been assessed as requiring accommodation under the Children Act 1989, or because they are owed a duty under the Children (Leaving Care) Act 2000 and duties towards homeless young people under the Housing Act 1996. Current services were commissioned in December 2013. One of the services that was tendered in 2013 was not appointed and subsequently some short term contracts were put in to place. In 2015 one contract that was delivering a significant number of accommodation units ended.

Current services include a range of accommodation including single flats, self-contained 24/7, shared accommodation 3-6 beds with high support, supported lodgings, accommodation for teenage parents and floating support services. Accommodation is offered for approximately 130 vulnerable young people a year and floating support in general needs to 75 young people and 25 teenage parents.

Coventry City Council Equality and Consultation Analysis (ECA) Form

Supply of accommodation through commissioned contracts has not met demand for the service, and demand has been met by spot purchasing accommodation to avoid homelessness. A tender process will be undertaken in 2019 to commission a new model of supported accommodation.

A decision was made in 2018 to transfer the responsibility of providing supported accommodation for homeless 18 – 25 year olds (including Care Leavers who return to supported housing after a failed tenancy) to Housing who have legal responsibility for them. Provision for these young people will be commissioned as part of the Homelessness Services recommissioning exercise.

A new model of supported accommodation for 16 – 17 year olds, and a low number of care leavers who have high support needs and are unable to move to their own tenancy, has been developed based on the findings from a number of consultation exercises. The proposed model is detailed in the below table:

Accommodation Type	Number of Units	Young People's Needs	Level of Support per Young Person
Single flats with floating support	51	Low to medium support needs	Minimum of 10 hours for first 4 weeks then 5 hours a week
Shared houses (no larger than 4 beds) with floating support available 24/7	23	Low to medium support needs	Minimum of 10 hours for first 4 weeks then 5 hours a week. Support must be provided to fit around young person e.g. evenings/weekends. Outside support for individual young person, staff on call with an immediate response if required.
Self-contained and small shared 24/7	7	High support needs	1 member of staff on site with each young person 24/7 including day support 8am – 10pm and a sleeping night
Supported Lodgings	3	Low support needs	Low level support to develop independence provided by host family
Young Parent (shared or self-contained)	8	Low to medium support needs	Minimum of 10 hours for first 4 weeks then 5 hours a week
Floating support	18	Low support needs and living in own tenancy	3 hours a week for up to 3 months
Teenage parents floating support	12	Low support needs and living in own tenancy	3 hours a week for up to 3 months

Coventry City Council Equality and Consultation Analysis (ECA) Form

The benefits of the new model include:

- A greater degree of control of placement supply through block contracts which will reduce the use of spot provision.
- Floating support services delivered by the accommodation provider to ensure the young person can continue to be supported by the same worker.
- Providers delivering a range of accommodation types so young people can easily step up and down within provision.
- An increase in local provision which will ensure continuity of employment, education and training as well as support from other support agencies.

2. Who do you need to consider as part of this ECA? **stakeholder analysis*

- Potential Supported Accommodation users in Residential and foster placements
- External Agencies
- The public
- Staff
- Trade Unions
- Current Supported Accommodation providers
- Current Supported Accommodation users 16-24 Year olds

Pre-Consultation Engagement

This section refers to any activities that took place (such as briefings, meetings, workshops, scoping exercises etc) with stakeholders before the formal consultation period.

3. What engagement activities took place prior to formal consultation and what feedback was received in relation to equality issues?

A number of initial engagement activities were conducted in 2015 to inform the proposed model.

A range of research, consultation and engagement and analysis has been undertaken, in order to more precisely identify the services which are required for an effective supported accommodation system. Learning from best practice in other local authorities includes the need to organise services along a positive pathway for young people

Consideration has been given to the preferred size of accommodation with smaller bed 4-6 bedded units preferred.

Feedback from young people identified the ideal model for most young people was independent living in flats with support when they needed it. However, young people commented on the need for rigorous assessment prior to living alone in an independent flat in the community and that this was not suitable for the most vulnerable young people. Provision of 24 hour support for those that need it the most was suggested, but the size of the unit should not be too large: one example was self-contained flats for up to 10 young people.

Feedback from professionals and providers confirmed that the Council should develop a pathway approach to delivering supported accommodation services, with assessment, progress (including

Coventry City Council Equality and Consultation Analysis (ECA) Form

specialist), and move on accommodation and support services. It also confirmed the findings from other local authorities who, on the whole, use shared accommodation service models.

The intention is to re-commission the current supported accommodation service. The proposed model is to provide small units of self-contained and shared accommodation with a range of support for 16-18 years olds and a small number of care leavers, in addition to provide floating support for vulnerable 16-18 year olds and care leavers, floating support and accommodation for teenage parents and specialised accommodation and support for teenage parents.

Provision for homeless 18 – 24 year olds previously sat together with provision for young people; this was returned to Housing in 2017. A new model for 18 – 24 year olds adults will be developed by Housing as part of the Homelessness Re-commissioning and a separate consultation process and ECA will be completed for this.

Analysis of Impact

In this section please ensure that you consider the three aims of the general duty as they affect **protected groups**. These groups are:

Age of young people who entered service during April 2016 to March 2017

35 (7%) young people were age 16 years compared to the Coventry 2011 Census of 7%.
121 (25%) young people were aged 17 years compared to the Coventry 2011 Census of 8%.

97 (20%) young people were aged 19 years compared to the Coventry 2011 Census of 14%.

136 (28%) young people were aged 18 years compared to the Coventry 2011 Census of 10%.

35 (7%) young people were age 16 years compared to the Coventry 2011 Census of 7%.
In total, 156 (32%) young people were aged 16/17 years.

Age of young people in the service during January 2019

40 (32%) young people were age 16 years compared to the Coventry 2011 Census of 7%.

73 (53%) young people were aged 17 years compared to the Coventry 2011 Census of 8%.

14 (9%) young people were aged 18 years compared to the Coventry 2011 Census of 14%.

6 (4%) young people were aged 19 years compared to the Coventry 2011 Census of 10%.

3(2%) young people were aged 20 years and above

In total, 113 (82%) young people were aged 16/17 years.

A significant number of young people were previously accessing homelessness services that were "all age" services; this service has allowed young people to access services more appropriate to their age. The impact of this has been a higher than expected number of 16 and 17 year olds accessing the service. One service provider exited the contract in January 2015, and consequently, availability of suitable shared accommodation was reduced, other services were spot purchased including small shared and single accommodation. The use of the single alternative accommodation can have a negative impact on some young people, as it can lead to isolation, anti-social behaviour (ASB) and additional placement moves for young people. The new commissioning model will have a positive impact by providing:

Coventry City Council Equality and Consultation Analysis (ECA) Form

- a) a greater range of accommodation services for clients who have been assessed as requiring supported accommodation.
- b) a focus on delivery specific accommodation for 16 and 17 year olds

Disability data of young people who entered service during April 2016 to March 2017

44 (47%) young people had Challenging behaviour (ADHD/Tourettes).

18 (19%) young people had Autistic spectrum condition.

13 (14%) young people had a Learning disability.

6 (6%) young people had Seizures or altered states of consciousness.

5 (5%) young people had a Physical (mobility) impairment.

4 (4%) young people had a Life-limiting illness.

2 (2%) young people had a Sensory (hearing) impairment.

0 (0%) Other disability

In total, 94 young people had a disability, however only 1 young person was identified by providers as being registered disabled.

Disability data of 138 young people in the service during January 2019

8 (6%) young people had Challenging behaviour (ADHD/Tourettes).

8 (6%) young people had Autistic spectrum condition.

3 (2%) young people had a Learning disability.

0 (0%) young people had Seizures or altered states of consciousness.

2 (1.5%) young people had a Physical (mobility) impairment.

0 (0%) young people had a Life-limiting illness.

0 (0%) young people had a Sensory (hearing) impairment.

1 (0.5%) Other disability

In total, 22 (16%) young people had a disability, this is significantly different to the data collected for the period April 2016 to March 2017 this is due to providers reporting those who were not formally registered with a disability.

There is not anticipated to be any negative or positive impact on this characteristic. A small number of units will be commissioned for young people with high support needs where the disability impacts on the support needs of the young person, this will be assessed via a needs and risk assessment.

Gender young people who entered service during April 2016 to March 2017

271 (58%) were male compared to the Coventry 2011 Census of 52%.

193 (41%) were female compared to the Coventry 2011 Census of 48%.

Gender young people in the service during January 2019

76 (55%) were male compared to the Coventry 2011 Census of 52%.

62 (45%) were female compared to the Coventry 2011 Census of 48%.

There is not anticipated to be any negative or positive impact on this characteristic. During the consultation process no issues were raised regarding mixed accommodation by service users or other stakeholders.

Gender reassignment young people who entered service during April 2016 to March 2017

3 (1%) young people are identified as transgender. 2 were transgender male to female and 1 was transgender female to male.

Coventry City Council Equality and Consultation Analysis (ECA) Form

Gender reassignment young people who were in the service during January 2019

0 (0%) young people are identified as transgender.

The data for this characteristic shows 0% of the young people identify with this characteristic.

Marriage/Civil Partnership young people who entered service during April 2016 to March 2017

106 young people were identified as never being married or being in a civil partnership.

Marriage/Civil Partnership young people who entered service during April 2016 to March 2017

138 young people were identified as never being married or being in a civil partnership.

Pregnancy/Maternity young people who were in the service during during April 2016 to March 2017

21 young people were identified as being pregnant, with a further 14 identified as giving birth during the past 6 months.

A number of young Fathers have wanted single accommodation which is currently offered by Valley House and accommodation for couples.

Pregnancy/Maternity young people who were in the service in January 2019

1 young person identified as being pregnant, with a further 11 identified as giving birth during the past 6 months.

A number of young parents have been supported in the floating support and accommodation services who were not eligible for support from Children's Services and were homeless with no social care involvement and the responsibility of Housing. This will lead to a reduction in the number of floating support and accommodation units required. Support for 18 – 24 year old parents who are vulnerable but whose baby is not known to social care will be considered as part of the recommissioning of adult homelessness services.

Ethnicity young people who entered service during April 2016 to March 2017

347 (76%) young people were White British compared to the Coventry Census of 69%.

5 (1%) young people were any other mixed background compared to the Coventry Census of 0.5%.

30 (7%) young people were African compared to the Coventry Census of 4%.

16 (3%) were White & Black Caribbean, 9 (2%) were any other white background.

5 (1%) were Caribbean, 2 (0%) were White & Asian, 5 (1%) were any other Black background. 2 (0%) were White Irish.

Ethnicity young people who were in the service during January 2019

83 (60%) young people were White British compared to the Coventry Census of 69%.

4 (3%) young people were any other mixed background compared to the Coventry Census of 0.5%.

11 (8%) young people were African compared to the Coventry Census of 4%.

2 (1%) were black Caribbean, 12 (9%) were any other white background.

2 (1%) were white and black Caribbean, 16 (12%) were White & Asian, 7 (5%) were any other Black background. 1 (1%) were White Irish.

Coventry City Council Equality and Consultation Analysis (ECA) Form

No issues regarding ethnicity were raised by stakeholders or service users during consultation, therefore it anticipated that this group will not be affected and no negative or positive impact is anticipated from the re-commissioning of services.

Religion/Belief young people who entered service during April 2016 to March 2017

The majority of young people were Christian, 50 (12%) compared to Coventry Census of 54%. However 322 (77%) young people said they had no religion or religion wasn't completed.

Religion/Belief young people who were in the service during January 2019

The majority of young people were Christian, 31 (22%) compared to Coventry Census of 54%. However 107 (77%) young people said they had no religion or religion wasn't completed.

No issues regarding religion/belief were raised by service users or stakeholders during consultation, therefore it anticipated that this group will not be affected and no negative or positive impact is anticipated from this re-commissioning of services, it is noted that some Muslim females may want single sex accommodation which is currently available.

Sexual orientation young people who were in the service during January 2019

79 (57%) young people were Heterosexual. 55(40%) were unknown, 2 (1.5%) were Bi-sexual, 2 (1.5%) were Gay and 0 (0%) were Lesbian. Sexual orientation data is not available from the Census.

Sexual orientation young people who entered service during April 2016 to March 2017

396(85%) young people were Heterosexual. 59(13%) were unknown, 5 (1%) were Bi-sexual, 6 (1%) were Gay and 1(0%) were Lesbian. Sexual orientation data is not available from the Census.

No issues regarding sexual orientation were raised by service users or stakeholders during in consultation, therefore it anticipated that this group will not be affected by commissioning of services.

The **three aims of the general duty** require that a public authority, in the exercise of its functions, must have due regard to the need to:

1. Eliminate discrimination, harassment and victimisation
2. Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it
3. Foster good relations between persons who share a relevant protected characteristic and persons who do not share it

Note – when identifying potential impacts below, please only include impacts that may exist over and above general impacts that may affect the wider community/population. For example, a reduction in grant to Coventry Citizens Advice would affect all service users through a

Coventry City Council Equality and Consultation Analysis (ECA) Form

reduced level of first line advice being available to all – but it would affect the following groups more; age, disability, gender and race as they represent a larger proportion of the clients who use the advice service.

4. Outline below how this proposal/review could impact on protected groups positively or negatively, and what steps (if any) could be taken to reduce any negative impact that has been identified. *NB. only include realistic mitigating actions that could be delivered.*

This proposal is aimed at improving the supported accommodation provided for Children Services young people in Coventry. The recommended proposal will have the largest impact on LAC and CIN young people in a positive way.

To assess the equality impact of the project it is helpful to understand the characteristics of the whole LAC population and current supported accommodation population. The data below has been gathered as part of the project to re - commission supported accommodation in Coventry.

Protected characteristic	Coventry's Looked After Children (LAC) and Supported Accommodation Population.
Age	<ul style="list-style-type: none"> • The total population of Coventry in 2015 was 345,385 • The % of usual residents children in Coventry aged 0–15 years old is 19.6% 6.6% are 16-19 years old and 10.8% are 20-24 years old • This is higher than the rest of England which is 6.6% • In August 2016, Coventry had 2054 children who were on a Child in Need plan and 504 on a Child Protection plan. • The number of Looked after Children (LAC) has remained at around 580 since March 2016.
	<ul style="list-style-type: none"> • Coventry currently has 75 children placed in children's homes. • This number is relatively stable, but is higher than the national average. Coventry currently has 192 internal fostering and 252 placed with IFAs Fostering. • Coventry currently has 138 young people placed in Supported accommodation.
	<ul style="list-style-type: none"> • The age range of the young people in supported accommodation services in January 2019 was 16-24 years. • In total, 113 (82%) young people were aged 16/17 years.
Disability	<ul style="list-style-type: none"> • In total, 22 young people had a disability.
Gender	<ul style="list-style-type: none"> • During the data collection there were a total of 55% females and 45% males placed in supported accommodation provision aged 16-24 yrs.
Gender reassignment	<ul style="list-style-type: none"> • 0 (0%) young people are identified as transgender.
Sexual Orientation	<ul style="list-style-type: none"> • 79 (57%) young people were Heterosexual • 55(40%) were unknown • 2 (1.5%) were Bi-sexual • 2 (1.5%) were Gay and • 0 (0%) were Lesbian.

Coventry City Council Equality and Consultation Analysis (ECA) Form

Ethnicity	<ul style="list-style-type: none"> • During the data collection the most dominant ethnic group were white British. • Other ethnic groups were significantly smaller e.g. white and Asian were 12%.
Religion/Belief	<ul style="list-style-type: none"> • The majority of young people were Christian, 31 (22%) compared to Coventry Census of 54%. • However 107 (77%) young people said they had no religion or religion wasn't completed.

5. Are there any other vulnerable groups that could be affected? i.e. deprivation, looked after children, carers.

As detailed above, this proposal will affect Looked after Children, but the aim is for this to be a positive change. The model for 18 – 24 Year olds adults will be developed by Housing as part of the Homelessness Recommissioning and a separate consultation process and ECA will be completed for this.

There is specific data on deprivation evidence shows users who currently access this service are from deprived areas of city.

6. What are the gaps in evidence? Can this be addressed during the consultation stage? If so, how?

There is a need to gather children's, stakeholder and staff feedback on the proposal. This consultation has taken place since 2015 running concurrently with the development of the ECA, and will be fed into section 2.

7. What are the likely impacts of this project/review on staff from protected groups?

The re-commissioning of supported accommodation services is likely to have a positive impact on 16/17 year olds and care leavers as a better range of services will be available. Specific beneficiaries will be those young people that are currently accommodated in single flats in the community, who would benefit from a provision that has support staff on site. Service specifications for the new services will require providers to deliver accessible, non-discriminatory services that meet the needs of all young people from protected groups, who are assessed as being eligible for supported accommodation.

Coventry City Council Equality and Consultation Analysis (ECA) Form

Part 2

This section should be completed AFTER the consultation stage has been concluded.

Author of this document: Penny Kay

Date of completion: 28.11.2018

Reviewed 4 March 2019

Post-Consultation

8. Referring to the information detailed in question 4 of Part 1 of the ECA Form, state if the consultation has confirmed the potential impacts identified that were identified. Also detail below any additional information about potential impacts that has been highlighted during the consultation.

A range of consultation activities were carried out to capture stakeholders' views on the proposal

These included:

1. Young People's Survey Consultation

In August 2018 a young people's consultation survey was undertaken. 51 young people who lived in supported accommodation completed a questionnaire on the proposed model.

The majority of young people were age 17 and 18 and living in single accommodation with floating support, shared housing with floating support and teenage parent accommodation.

92% of young people said their accommodation encouraged them to live healthy lifestyles and 94% said they felt safe in the accommodation. 88% said there were supported with independent living skills and maintaining their accommodation

47% of young people said they would prefer single gender accommodation and 43% mixed accommodation.

Key comments made by young people included

- More supported accommodation is needed
- Accommodation should be modern and homely
- There should be easy access to childcare, housing, financial support and employment
- There is insufficient supported accommodation for housing parents
- Supported accommodation is often not in a suitable area
- More single room supported accommodation is required.

Coventry City Council Equality and Consultation Analysis (ECA) Form

2. Provider and stakeholder telephone interviews and surveys

In October 2018 consultation on the proposed model was undertaken with stakeholders and providers. The consultation process comprised on-line surveys on Survey Monkey, InTend and a detailed telephone interview with key providers.

A table summarising the number of responses is detailed below:

Area	Number Completed
Social Care Teams – Through Care, LAC & Permanency, YOS, Area Teams & Health Services	10
Stakeholders - Current Providers	21
Stakeholders - National Providers	14
Total	text-align: center;">45

Key findings from the consultation were:

- 87% of providers and stakeholders said that floating support should be delivered by the accommodation provider.
- 95% of providers and stakeholders said that a crisis bed/crash pad was required.
- 89% of providers and stakeholders said that a training flat was required but identified that the length of stay would need to be sufficient to develop independence skills.
- 77% of providers and stakeholders preferred the option of commissioning lots that have a range of accommodation types delivered by the same provider. 9% of providers and stakeholders had no preference.

Additional comments included:

What is working well?

- Mix of accommodation types
- Floating support
- 24/7 support on site
- Outcome focused model

Improvements/challenges?

- Availability of accommodation
- Transition to adults
- Improved communication with social care and placements
- Regular forums to share good practice
- Move young people to Supported Accommodation earlier so providers have longer to achieve outcomes.
- Affordability for young people who work but also require support

Coventry City Council Equality and Consultation Analysis (ECA) Form

- Local Authority decisions can be led by cost not need
- Turnover of social care staff
- Lack of emergency accommodation
- Need for block contracts to allow providers to plan provision and enable better value for money

Other issues

- The tender should state the outcomes model that should be used by all providers e.g. outcomes star
- Need for additional mental health services
- Providers need support to source accommodation - new providers from outside Coventry may not enter the market unless accommodation is provided as part of the bid.

3. Provider event

In December 2018 a provider event was held to consult in further detail on the proposed supported accommodation model. Invitations were sent to all Coventry supported accommodation providers, all providers on the West Midlands Supported Accommodation Framework and advertised nationally on In Tend.

32 delegates attended the event from 19 organisations.

Feedback from providers included:

Crisis Bed

- Providers asked for clarification about how a crisis bed would operate if the support is provided by Coventry City Council Edge of Care services, as there are often difficulties when two organisations deliver services. It was clarified that Edge of Care will deliver all support to the young person and their family, and the provider will be responsible for providing the accommodation and any out of hour's emergencies.
- Some providers reported that matching may be difficult if the crisis bed is attached to shared provision. Consideration should be given to delivering the crisis bed in self-contained accommodation.

Support Hours

- Providers reported that they sometimes experience delays in the approval for additional support hours. The process for approving an increase in support hours via authorisation from the Operational Lead and Resource Panel was clarified.
- The support hours for low/medium support young people will reduce from 10 hours to 5 hours after the first four weeks. This will be automatic and will not require approval.
- All increases in support hours are tracked and a review date agreed to assess whether the hours could be stepped down.
- Providers commented that referral information is sometimes limited, particularly in relation to emergency placements. Placements confirmed that work is currently taking place to review and improve referral information.

Coventry City Council Equality and Consultation Analysis (ECA) Form

Tender Process

- The tender process will accept individual, consortia and sub-contracting applications.
- Some providers expressed concern that establishing a consortium arrangement takes a significant amount of time and requires on-going management support to ensure that the partnership is working effectively.

Commissioning Lots

- Some providers commented that the scale of the Lots was too large for a number of smaller providers and the Lots needed to be more flexible. If they remain at 3 Lots of mixed accommodation/support then providers that offer a targeted service may be unable to tender unless they join a consortium or sub-contract.
- Consideration should be given to amending the Lots from the number of units based on the type of accommodation to the number of units based on the needs of young people (low need, high need etc). Providers would then be responsible for determining the accommodation type.
- Confirmation is needed to clarify whether a provider will be able to tender for more than one Lot. This will be detailed in the tender documents.
- Consideration should be given as to whether there could be a flex around the age of the service for Teenage Parents. It is currently 16-18 but could support be offered up to 24?
- Providers raised the issue of the availability of suitable accommodation in Coventry which may prevent new providers from tendering. The timescale in the tender from award to contract commencement may not give new providers adequate time to source accommodation. Consideration will be given to staggering the start date and/or the contract not commencing until accommodation has been purchased or leased. Commissioning and Procurement will notify providers with information on the availability of accommodation if they are advised of any vacant premises by landlords.

As a result of the provider event the Lots were amended to include one Lot of mixed provision and five Lots of separate types of provision. An additional month was also added to the implementation phase to allow providers more time to source accommodation.

Outcome of equality impact

9. Indicate which of the following best describes the equality impact of this project/review:

There will be **no** equality impact if the proposed option is implemented

There will be **positive** equality impact if the proposed option is implemented

There will be **negative** equality impact if the proposed option is implemented but this can be objectively justified

There will be both **positive and negative** impacts if the proposed option is implemented

**Coventry City Council
Equality and Consultation Analysis (ECA) Form**

Summary of ECA

Next steps

Please send this completed ECA to the Insight Team as follows:

Wendy Ohandjanian (wendy.ohandjanian@coventry.gov.uk tel. 7683 2939)

Jaspal Mann (jaspal.mann@coventry.gov.uk tel. 7683 3112)

Version Control

Version	Date	Summary of changes (Author)
1.0.0	26.05.16	Initial release (Jaspal Mann)