



Open Report on behalf of Glen Garrod, Executive Director of Adult Care and Community Wellbeing

Report to:	Councillor M J Hill OBE, Leader of the Council and Executive Councillor for Resources, Communications and Commissioning
Date:	12 - 19 April 2023
Subject:	Community Supported Living for Working Aged Adults at Grange Farm, Market Rasen with ACIS Group
Decision Reference:	I026178
Key decision?	Yes

Summary:

This report recommends a further £800,000 of the designated capital programme budget is released to support the Grange Farm Scheme. Construction is planned to commence in summer 2023, for completion in summer 2024. These timescales, however, depend upon planning and funding being granted.

The Grange Farm project is a proposed partnership between Lincolnshire County Council (**LCC**) and ACIS Group (**ACIS**), to support the development of Community Supported Living accommodation for Working Aged Adults with learning disabilities, mental illness, and/or physical disabilities. The proposed Scheme will address the anticipated demand in the West Lindsey District and provide alternative accommodation choice with the aim of maximising independence.

ACIS propose to redevelop Market Rasen House, a large Grade II listed building situated in a prominent location and a short walk from Market Rasen town centre. The accommodation will comprise of ten apartments and communal facilities with access to 24/7 on-site care and support provision which LCC will commission.

A contribution of £800,000 will provide LCC nomination rights on all ten apartments for 30 years, using a process of first refusal with no void liability. LCC's contribution is on the condition ACIS acquires relevant approvals, obtains planning permission/listed building consent, and secures the additional funding required.

Adult Care's remaining capital programme budget is £5.851 million (accounting for De Wint Court, The Hoplands and Prebend Lane). Initial findings suggest that a £800,000 investment could generate an annual saving of £0.089m based on 2022/23 prices. On this basis and assuming a rate of inflation totalling 2 per cent for the duration of the Scheme, it is estimated that the total savings will equal the total value invested (i.e., the breakeven point) after 9 years.

Recommendation(s):

That the Leader of the Council and Executive Councillor for Resources, Communications and Commissioning approves the scheme appraisal for the payment of £800,000 by way of grant from the Adult Care capital programme for Lincolnshire to ACIS through a Funding Agreement to support the development of Grange Farm, in return for nomination rights for 30 years on ten units, through a process of first refusal with no void risk.

That the Executive Councillor for Adult Care and Public Health:

1. Approves the payment of £800,000 by way of grant from the Adult Care capital programme for Lincolnshire to ACIS through a Funding Agreement to support the development of Grange Farm, in return for nomination rights for 30 years on ten units, through a process of first refusal with no void risk; and
2. Delegates to the Executive Director for Adult Care and Community Wellbeing, the authority to determine the final form and approve all legal documentation necessary to give effect to the above decisions.

Alternatives Considered:

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| 1. | <p>Do Nothing: This is not a reasonable option. The lack of Community Supported Living accommodation in Lincolnshire for Working Aged Adults with learning disabilities, mental health illness, and/or physical disabilities will continue to limit choice and increase revenue costs for LCC in the medium and long term.</p> <p>There is extremely limited access to accommodation where there are multiple units together which the Council can provide a range of support to a higher number of people within a proximity. Although an individual may not require a high number of physical support hours, they may require access to support on an ad hoc basis, therefore ten apartments in the same area means LCC can appoint core staff who will respond as required. This is more cost effective than if the individual lived in individual accommodation where staff hours would be higher. In addition, in the last few years it has become increasingly necessary to seek placements outside of Lincolnshire due to lack of provision within the county which is something Adult Care seeks to avoid.</p> |
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Reasons for Recommendation:

- To enable LCC to support the development of accommodation for Working Aged Adults with learning disabilities, mental health illness, and/or physical disabilities in partnership with ACIS, thereby benefiting from their existing housing development and management capacity, resources, and expertise to support the maximising independence agenda, offset higher revenue costs of residential care, and enable LCC to reinvest resources in preventative measures.
- To provide the means for LCC to use its existing and future best value care and support contracts to support the new development.
- The proposed contractual arrangement enables LCC to contribute compliantly with procurement and subsidy control obligations to the delivery of such accommodation, at the least risk in relation to the operation of facilities, and in particular financial implications in respect of voids.

1. Background**The Strategic Case**

- 1.1 Community Supported Living accommodation promotes improved wellbeing and increased independence and enables approaches to be adapted in the right provision of care and support. It also enables individuals to exercise further choice and control in key aspects of their life, such as where they live and the type of support package they receive. Additionally, Community Supported Living accommodation encourages inclusivity within the local community, assisting people to access services closer to home. Tenants can also develop skills and knowledge and build their confidence, subsequently enhancing their quality of life.
- 1.2 In addition to improving the health and wellbeing of Lincolnshire residents, a key objective for the Adult Care capital programme is to help divert vulnerable adults of working age from residential care and avoid inpatient admissions, consequently enabling LCC to reinvest resources in preventative services. Furthermore, the development of Community Supported Living accommodation presents an opportunity to generate a sustainable future for health and social care in Lincolnshire; thereby meeting a key ambition of the sustainable services review.
- 1.3 In the context of austerity for local authorities in England, social care services for adults of working age are under-resourced. Services are experiencing growing demand and increasingly complex care needs across all age ranges. This is in addition to rising National Health Service pressure and spiralling staff costs, as highlighted in research by the Association of Directors of Adult Social Services. The research shows councils require a sustainable long-term funding strategy to underpin social care. Lincolnshire is no exception to this national picture and, as such, alternative approaches such as Community Supported Living accommodation need exploring to deliver the most cost-effective service.

- 1.4 Applying national projections locally suggests that 994 units are required in Lincolnshire for Working Aged Adults with learning disabilities, mental illness, and/or physical disabilities. This figure is expected to rise to 1,239 by 2030.
- 1.5 The table below shows the number of Working Aged Adults aged 18 to 64 who resided in supported accommodation and in receipt of Adult Social Care services and/or Continuing Health Care (CHC) funded from budgets managed by LCC at the 31 March 2021. This would suggest a current shortfall of 544 units.

Supported Accommodation for (WAA) 18 to 54	Group Homes with Shared Living	Individual Accommodation with own front door	Bespoke Accommodation for people with complex needs	Extra Care Accommodation	Total
Learning Disability	323	38	3	6	370
Mental Health	16	21	4	4	45
Physical Disability	18	9		7	34
Other				1	1
Total	357	68	7	18	450

- 1.6 LCC has contributed to the development of a 'Homes for Independence' Lincolnshire strategy, which the Housing, Health, and Care Delivery Group oversees. The strategy articulates the types of housing required to support LCC service users, the scale of this need, and the geographic hotspots in the county. LCC is working in partnership with District Councils and Registered Providers to deliver the requirements, rather than direct delivery. The strategy is publicly available to support the market to develop suitable delivery approaches.
- 1.7 A Joint Mental Health, Learning Disability and Autism (**MHLDA**) Accommodation Strategy Group has been established to provide a more integrated working approach to the sourcing and planning of care and accommodation for adults with learning disabilities, mental health illness, and/or physical disabilities. The strategy group is a partnership between LCC, Lincolnshire Integrated Care Board (**LICB**) and Lincolnshire Partnership NHS Foundation Trust (**LPFT**). Additionally, through its sourcing sub-group, membership extends to other key stakeholders as required, including District Councils and Public Health.
- 1.8 A key aim of the Joint MHLDA Accommodation Strategy Group is to maximise people's independence and to reduce dependency on traditional types of institutional care, including Mental Health Inpatient Care and residential and nursing care. To achieve this aim, alternative community-based accommodation is required where these can best meet the needs within overall resources available.
- 1.9 This strategic approach is not just applicable to new admissions but of equal importance to those already in receipt of services. The ambition is to support a higher proportion of people at higher levels of independence in line with the evolving independence pathway. Please see Appendix A.

- 1.10 To achieve this ambition and other key priorities, the Joint MHLDA Accommodation Strategy Group is driving a significant increase in the need for supported accommodation.

The Business Case for Grange Farm

- 2.1 This business case equips LCC with the information required to make an informed decision on securing nomination rights for ten units at the proposed new Grange Farm Scheme in Market Rasen, at a cost of £800,000 from the Adult Care capital programme.
- 2.2 The Scheme aims to reduce the long-term costs of care provision, as cost avoidance, and provide Working Aged Adults with learning disabilities, mental illness, and/or physical disabilities with alternative accommodation choice which maximises independence. The proposed development will enable individuals to remain and access services within their local community and close to their social networks. The provision is not aiming to generate profitable income but will, however, support LCC to reinvest resources into more preventative measures through the long-term cost reduction of care provision.
- 2.3 LCC will purchase nomination rights to help meet the identified need within the West Lindsey district, for a period of 30 years, with first refusal and no void risk. LCC will enter into a Nominations Agreement and Funding Agreement to confirm the terms and conditions of the relationship with ACIS prior to construction. A draft nominations process and joint workshops will develop the operational delivery of the Scheme, the allocations panel, and nominations process.
- 2.4 The Grange Farm Scheme will play an important part in enhancing individual's independence and wellbeing, together with increasing longevity and quality of life; creating a home for life and somewhere to age in place. Individual tenancies will provide privacy, whilst communal spaces will provide an area to meet with others and engage in meaningful and purposeful activities if they choose to. Tenants within the Scheme will benefit from access to 24-hour care and support which LCC will commission. Furthermore, ACIS will provide additional intensive housing management support.
- 2.5 Alongside the accommodation, a community-led social enterprise opportunity is being explored which will support people to grow and progress through the provision of horticulture and animal care. The outbuildings will be designed sensitively to provide a safe, secure, and caring learning environment, alongside the potential to welcome the wider community as part of its income generating and wider community benefit activities. The enterprise will focus on delivering learning and independence skills through growing produce and caring for animals. It is important to note, however, the development of the social enterprise falls outside the scope of this project.
- 2.6 LCC proposes to contribute £800,000 to the Scheme, for which the funding model is set out later within this report. LCC, however, must comply with its obligations

regarding subsidy control, which have replaced the State aid rules in the United Kingdom except in limited circumstances, which do not apply here. A failure to comply with the subsidy control rules can result in an order by the Competition Appeal Tribunal to recover unlawful subsidy. As a result of the change in law, LCC can no longer rely on the Commission Decision (2012/21/EU), which treated Extra Care Housing and Community Supported Living accommodation as a Service of General Economic Interest that could be funded compliantly under the State aid rules. However, the new subsidy control rules in the Subsidy Control Act 2022 (**SCA 2022**) include similar provisions that allow funding to be given compliantly for what are called Services of Public Economic Interest (**SPEI**).¹ The SPEI rules do not list the type of services that would be in scope. However, the explanatory notes accompanying the SCA 2022 give social housing as an example of SPEI.² The Statutory Guidance for SCA 2022 also gives social housing as an example of SPEI.³

- 2.7 The Grange Farm Scheme will deliver social housing and social services, which are within the scope of SPEI. LCC, therefore, intends to rely on the SPEI rules to provide grant funding to support the construction which will provide both affordable housing and social care to those who qualify and are nominated by LCC.
- 2.8 LCC's Funding Agreement will be drafted to incorporate the requirements of the SPEI rules and will include provisions to ensure that the level of subsidy provided through the grant, when assessed alongside all other public sector subsidy for the project, does not exceed the costs of delivery plus a reasonable margin for ACIS. In addition to including appropriate SPEI provisions in the Funding Agreement, to comply with the new subsidy control rules, LCC must assess whether the grant of £800,000 would be consistent with seven key general subsidy principles. An assessment is appended to this report (see Appendix C), and in summary concludes that the grant would be consistent for the reasons identified.
- 2.9 Construction is planned to commence in summer 2023, for completion in summer 2024. These timescales, however, depend upon planning and funding being granted.

3 Benefits and Risks

- 3.1 LCC uses a continuum of five levels for risk appetite and corporately takes a 'Creative and Aware' approach, which is summarised as being: 'creative and open to considering all potential delivery options, with well measured risk taking whilst being aware of the impact of its key decisions; a 'no surprises' risk culture.' This is deemed a suitable risk appetite level for this Scheme. Below is a summary of the identified key benefits and risks of this Scheme.

¹ Section 29 of the Subsidy Control Act 2022

³ Paragraph 106 of the explanatory note (available [here](#)).

⁴ The five levels are: Averse, Cautious, Creative and Aware, Opportunist and Mature (Hungry).

³ Paragraph 1.36, Statutory Guidance for the United Kingdom Subsidy Control Regime

Benefits	Risks
<ul style="list-style-type: none"> • Additional accommodation contributing to the current and projected need and the local economy. • Reduction/diversion in the long-term costs of care provision. • Increasing the availability of suitable housing and provides appropriate flexible care provision. • Supporting tenants with learning disabilities, mental health illness, and/or physical disabilities within Lincolnshire to stay within their local communities. • Multiple care needs can be managed on one site by one provider. • Promotes independence and enhances wellbeing for tenants. • Reduces/avoids admission to hospital, consequently expanding hospital bed capacity. • Release of local housing for rent and sale to benefit families. • Excellent day-to-day services ensuring that the quality of the scheme environment. • A genuinely affordable proposition with a focus on value for money. • Additional employment opportunities. 	<ul style="list-style-type: none"> • Creating too much accommodation capacity compared to demand. • Not managing demand and nominations effectively. • Service users do not want to move to the site. • Accommodation design is not flexible enough for multiple needs. • ACIS is unable to obtain their board approval. • ACIS is unable to secure planning permission. • ACIS is unable to obtain sufficient funding to ensure the scheme's viability. • Tender prices are higher than budgeted due to cost-of-living crisis and volatile construction market. • The property requires significant investment, and costs could escalate throughout development.

4 Market Sufficient and Competition

4.1 The development and delivery of Community Supported Living accommodation typically involves partnerships which include a mixture of local authorities, funding organisations, architects, construction companies, housing associations, and care providers. There is continuous work and analysis needed to fully understand Lincolnshire's market of those parties willing and able to deliver the county's needs. Indications to date, through liaison with providers and other local authorities' experience, are that housing providers are looking to enter the county; however, Lincolnshire has a low sale and rental value of property compared to other areas of the United Kingdom, which can affect the willingness and ability of organisations to develop.

5 Delivery Model

5.1 In accordance with LCC's direction of travel and appetite for delivering Extra Care Housing and Community Support Living accommodation, with external legal support the best delivery method has been sought to ensure LCC is legally in a safe position to support the delivery of Community Supported Living accommodation for Working Aged Adults with learning disabilities, mental illness and/or physical disabilities, and

to provide best value for money and enrich the lives of as many people as possible. Various delivery options were set out in the initial Extra Care Housing paper for the development of De Wint Court. As part of this approval, the Council decided to deliver Schemes via grant funding to District Councils and/or Housing Associations who have formed a robust business case. LCC's financial contribution provides LCC with the right to nominate into schemes without void liability underpinned by a Nominations and Funding Agreement. The De Wint Court paper can be obtained via Democratic Services.

6 Recommendations

- 6.1 The recommendation is for LCC to progress with the partnership with ACIS, whereby LCC contributes to the development of the Grange Farm Scheme in Market Rasen in return for securing nomination rights on all ten properties.
- 6.2 The inherent financial benefits for LCC are as follows:
- **No void costs:** In previous models of Community Supported Living accommodation and Extra Care Housing, LCC has accepted void risk which provided the housing provider with assurance that vacant properties would be filled within the specified period with units able to remain vacant for a limited period before additional cost become due. With the current Funding Agreement model, the use of Capital Reserves as a financial contribution to any proposed schemes can be justified on the basis that the contribution allows LCC to place service users of their choosing within a pre-agreed proportion of units, over a pre-determined number of years without recourse to void costs.
 - **Diversions from Residential Placements:** The availability of additional Community Supported Living units directly funded via Capital Reserves allows for an additional number of services users who would otherwise be placed in residential establishments to be supported within a supported living environment.
- 6.3 By placing individuals within Community Supported Living accommodation, LCC avoids expensive hotel costs which would otherwise be incurred, with costs funded via district housing benefit contributions instead. Care and support via LCC's existing prime provider framework are also likely to be cheaper than existing residential care and non-care provision.

7 The Financial Case

- 7.1 Funding for the Grange Farm Scheme is sourced via Adult Care Capital Reserve which has been allowed to grow over time because of grant funding awarded to LCC. The grants are specifically earmarked for use against capital investment within Adult Care with the current value of unused capital reserves totalling £5.851 million (accounting for De Wint Court, The Hoplands and Prebend Lane).
- 7.2 The financial feasibility of the Scheme (cost versus savings) is based on LCC's bespoke Financial Feasibility Model (Appendix B). This model has been used to develop the financial models for other LCC Extra Care Housing projects and considers several options, including number of tenants, cost of care and savings through diversion of care.

- 7.3 The financial benefits of CSL accommodation are predicated on the basis that the costs of providing care within such setting are lower than in traditional residential settings. Grange Farm plans to accommodate ten units. The cost of delivering the equivalent level of traditional residential services is £0.428m per annum. This cost is based on the average cost of residential provision in 2022/23 across working age adults.
- 7.4 The expected cost of delivering care based at Grange Farm is £0.339m per annum. This assumes 280 hours inclusive of sleep ins plus a forecast assumption of one-to-one hours needed to support residents.
- 7.5 Development of the proposed Scheme is forecast to reduce the costs of service delivery by £0.089m per year.
- 7.6 Assuming a rate of inflation totally 2 per cent for the duration of the Scheme, it is estimated that the total savings will equal the total value invested (i.e., the breakeven point) after 9 years. However, this does not consider the time value of the initial investment which will reduce over the same the period (i.e., the value of £1 in 2023/24 will be less in future years).

8 Legal Issues

8.1 Care Act 2014

LCC has a range of social care responsibilities. These obligations have been consolidated under the Care Act 2014. LCC is under a duty to assess the care needs and arrange care plans to meet the eligible care needs of those persons.

Section 8 of the Act provides flexibility in how to meet needs and includes:

"8. (1) The following are examples of what may be provided to meet needs under sections 18 to 20—

- (a) accommodation in a care home or in premises of some other type.
- (b) care and support at home or in the community.
- (c) counselling and other types of social work.
- (d) goods and facilities.
- (e) information, advice, and advocacy.

(2) The following are examples of the ways in which a local authority may meet needs under sections 18 to 20—

- (a) by arranging for a person other than it to provide a service.
- (b) by itself providing a service.
- (c) by making direct payments."

Local authorities also have market shaping and market making duties under the Act. Section 5 of the Act sets out duties on local authorities to facilitate a diverse, sustainable high-quality market for their whole local population, including those who pay for their own care and to promote efficient and effective operation of the adult care and support market.

Sections 48 to 56 of the Act ensure that no one goes without care if their provider's business fails and their services cease. It covers:

- CQC market oversight.
- Contingency planning by local authorities and duties to step in and ensure continuity of care in the event of provider failure and service cessation.

LCC is concerned about the sufficiency of provision in the county of Community Supported Living accommodation for Working Aged Adults with learning disabilities, mental health and/or physical disabilities and wishes to expand the availability of provision. The purpose of the grant is therefore to deliver increased availability of suitable provision that will assist in meeting the health and social care needs of its residents. On the basis that extra capacity is made available then the grant would be within LCC's powers under the Care Act 2014, including various provisions mentioned above, and the grant would be calculated to facilitate or would be conducive or incidental to the discharge of functions under the Care Act pursuant to section 111 Local Government Act 1972.

8.2 Equality Act 2010

Under section 149 of the Equality Act 2010, the Council must, in the exercise of its functions, have due regard to the need to:

- Eliminate discrimination, harassment, victimisation, and any other conduct prohibited by or under the Act.
- Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it.
- Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

The relevant protected characteristics are age; disability; gender reassignment; pregnancy and maternity; race; religion or belief; sex; and sexual orientation.

Having due regard to the need to advance equality of opportunity involves having due regard to the need to:

- Remove or minimise disadvantages suffered by persons who share a relevant protected characteristic connected to that characteristic.
- Take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it.

- Encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.

The steps involved in meeting the needs of disabled persons that are different from the needs of persons who are not disabled include steps to take account of disabled persons' disabilities.

Having due regard to the need to foster good relations between persons who share a relevant protected characteristic and persons who do not share it involves having due regard to the need to tackle prejudice and promote understanding.

Compliance with the duties in section 149 may involve treating some persons more favourably than others.

The duty cannot be delegated and must be discharged by the decision-maker. To discharge the statutory duty the decision-maker must analyse all the relevant material with the specific statutory obligations in mind. If a risk of adverse impact is identified consideration must be given to measures to avoid that impact as part of the decision-making process.

An initial Equality Impact Analysis is attached at Appendix D. This will be kept under review. ACIS is itself subject to the Equality Act duty and LCC will use its influence to ensure equality issues are considered in relation to both the housing and care elements of the Scheme as it progresses.

The key purpose of the service is essential to enabling all those individuals who require community care services to live more independent and healthier lives. In that sense, ensuring adequate provision of suitable Community Supported Living accommodation and associated care helps to advance equality of opportunity. The ability of the providers of housing and care to provide services which advance equality of opportunity will be considered in the associated procurement and providers will be obliged to comply with the Equality Act.

The service will not affect those with protected characteristics (age; disability; gender reassignment; pregnancy and maternity; race; religion or belief; sex; and sexual orientation) differentially. The nature of the service makes it more likely that adults with additional vulnerabilities or increased risk of adverse outcomes will benefit most.

8.3 Joint Strategic Needs Assessment (JSNA and the Joint Health and Wellbeing Strategy (JHWS)

The Council must have regard to the Joint Strategic Needs Assessment (JSNA) and the Joint Health and Wellbeing Strategy (JHWS) in coming to a decision.

The JSNA for Lincolnshire is an overarching needs assessment. A wide range of data and information was reviewed to identify key issues for the population to be used in planning,

commissioning, and providing programmes and services to meet identified needs. This assessment underpins the JHWS 2013-18 which has the following themes:

- Promoting healthier lifestyles
- Improving the health and wellbeing of Working Aged Adults with learning disabilities, mental health, and/or physical disabilities
- Delivering high quality systematic care for major causes of ill health and disability
- Improving health and social outcomes and reducing inequalities for Working Aged Adults with learning disabilities, mental health and/or physical disabilities
- Tackling the social determinants of health.

The provision of Community Supported Living units will contribute directly to these themes. It also supports the themes selected as priorities in the forthcoming refreshed JHWS, namely housing, carers, mental health, plus the cross-cutting theme of safeguarding.

8.4 Crime and Disorder

Under section 17 of the Crime and Disorder Act 1998, the Council must exercise its various functions with due regard to the likely effect of the exercise of those functions on, and the need to do all that it reasonably can to prevent crime and disorder in its area (including anti-social and other behaviour adversely affecting the local environment), the misuse of drugs, alcohol and other substances in its area and re-offending in its area.

In commissioning housing and care provision that is designed to provide a supportive and safe environment that enables potentially vulnerable customers to maintain their independence for longer, the provision of Community Supported Living accommodation may be said to contribute indirectly to the achievement of obligations under section 17

9 **Conclusion**

LCC and ACIS' partnership will enable LCC to increase the provision of Community Supported Living accommodation in the county, to assist in offsetting medium-and long-term revenue cost increases and facilitate individuals to live independently for as long as possible within their local communities; subsequently improving the wellbeing and quality of life for Lincolnshire people.

10 Legal Comments:

LCC has the power to enter the arrangement proposed. The legal implications in relation to subsidy control are set out in the Report.

The decision is consistent with the Policy Framework and within the remit of the Executive.

11 Resource Comments:

Funding of £800,000 for the development of the Grange Farm Scheme exists in the form of previously received capital grants which form part of the Adult Care Capital Programme. LCC's contribution must fall within the processes for Capital expenditure.

12 Consultation

a) Has Local Member Been Consulted?

Yes

b) Has Executive Councillor Been Consulted?

Yes

c) Scrutiny Comments

This report will be considered by the Adults and Community Wellbeing Scrutiny Committee at its meeting on 5 April 2023 and the comments of the Committee will be reported to the Executive Councillors.

d) Have Risks and Impact Analysis been carried out?

An initial Equality Impact Assessment has been completed and there has been internal and external consultation.

13 Appendices

These are listed below and attached at the back of the report	
Appendix A	Levels of Independence
Appendix B	Market Rasen Financial Modelling
Appendix C	Subsidy control principles and evaluation
Appendix D	Equality Impact Assessment

14 Background Papers

The following background papers within Section 100D of the Local Government Act 1972 were used in the preparation of this report.

Background Paper	Where it can be viewed
Report to Executive on 9 July 2019 in relation to De Wint Court project in partnership with City of Lincoln Council.	Agenda for Executive on Tuesday, 9th July, 2019, 10.30 am (modern.gov.co.uk)
Report to Executive on 2 February 2021 in relation to The Hoplands project in partnership with North Kesteven District Council.	Agenda for Executive on Tuesday, 2nd February, 2021, 10.30 am (modern.gov.co.uk)

Report to Executive on 2 November 2021 in relation to Prebend Lane, Welton project in partnership with LACE Housing.	Agenda for Executive on Tuesday, 2nd November, 2021, 10.30 am (moderngov.co.uk)
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This report was written by Emma Rowitt, who can be contacted on 07423 492024 or emma.rowitt@lincolnshire.gov.uk.

Appendix One - The Levels of Independence

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Level 4 - Secure accommodation & Mental Health Inpatient Care



Level 3 - High Complexity Residential and Community Supported Living:
access to 24 hour support for people with complex needs or risky behaviour



Level 2 - Residential Care & Community Supported Living:

- Community Supported Living
- Step-up/Step down
- Short stay/respite
- Own tenancy



Level 1 - Independent Living

- Own Home Ownership
- Rented Accommodation
- Living with family or friends
- Shared lives placements

Increasing Level of Independence

Market Rasen Revenue Model

New Service

10 Number of Units, with no sharing

Core hours	Annual Cost £
210 Day	
63 Night	
7 Sleep in	
280 Externally provided CSL Hours at £17.60 per hour	256,256
9 Average 1:1 assessed hours per person	
Forecast cost of assessed hours	82,368
Cost of New Service	338,624

Existing Costs, replaced by new service

Build Layout	Rooms	Clients		Annual Cost £
Ground floor	4	PD	PD res rate	178,464
Middle floor	5	LD/Mental health	CSL	182,000
Top Floor	1	LD/Mental health high needs	Res	67,600
Cost of Existing Service (without the build)				428,064

Potential Saving	89,440
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Service user contribution is not assumed as likely the service user would need to pay rent

Principles	How does the subsidy comply with the principle?
<p><i>Principle A</i> - The subsidy pursues a specific public policy objective to remedy an identified market failure or to address an equity rationale such as social difficulties or distributional concerns (“the objective”).</p>	<p><u>Remedying an identified market failure</u></p> <p>LCC’s provision of £800,000 grant funding (Grant) to ACIS Group (ACIS) pursues the specific public policy objective of seeking to remedy the market’s failure to provide sufficient Community Supported Living (CSL) accommodation in the West Lindsey district.</p> <p>LCC’s Extra Care Needs Assessment undertaken in 2014, and updated in 2017, introduces LCC’s vision for the provision of Extra Care Housing and Community Supported Living accommodation in the local area.</p> <p>Projections suggest that there is currently a need for 994 units of supported accommodation in Lincolnshire to support working age adults with learning disabilities, mental illness, and/or physical disabilities, and that this requirement will rise to 1,239 by 2030. There are currently only 450 units of supported accommodation in Lincolnshire, meaning that there is currently a shortfall of 544 units which the market has failed to provide.</p> <p>The Grant will be used to remedy the market’s failure to provide enough CSL accommodation in the West Lindsey district. The Executive Report notes that there is no current provision of CSL in the West Lindsey district. Once the project has been completed, LCC will receive nomination rights on all 10 units for a period of 30 years.</p> <p>The fact that the Grant will fund what can properly be classed as a service of public economic interest (SPEI) under the subsidy control rules is itself evidence of the market failure.</p> <p>LCC has been advised by its legal advisers that providing affordable housing to private citizens who qualify on financial grounds would fall squarely within the scope of an SPEI, and this is supported by social housing being given as an example of SPEI in both the explanatory note and the statutory guidance relating to the Subsidy Control Act 2022.</p> <p><u>Addressing an equity concern</u></p> <p>There is also the policy objective of addressing an equity concern. The project will provide LCC with nomination rights to allocate supported accommodation for 10 working aged adults with learning disabilities, mental illness, and/or physical disabilities. This category of adults is vulnerable and experience considerable health, social and economic disadvantages because of their disabilities.</p> <p>The Strategic Case in the Executive Report sets out in more detail the underlying justification for this policy objective, including the following:</p> <ul style="list-style-type: none"> • CSL accommodation improves the health and wellbeing of Lincolnshire residents and greater inclusivity, through more appropriate and responsive housing. • Appropriate CSL accommodation helps to divert a number of working-age adults with a disability from moving into residential care, inpatient admissions, and out-of-county placements, thereby helping to maximise their independence and resulting in costs savings for LCC estimated at £0.089m per annum which will enable LCC to reinvest more resources in preventative services to benefit the same category of individuals.

Principles	How does the subsidy comply with the principle?								
	<ul style="list-style-type: none"> • Housing (generally) is a key priority for the Health and Wellbeing Board and this grant contributes to the impact on the following LCC Corporate Plan Strategies <ul style="list-style-type: none"> ○ Adult Frailty and Long-Term Conditions ○ Special Adult Services ○ Carers ○ Adult Safeguarding; and ○ Wellbeing. <p><u>Conclusion</u></p> <p>Taking into account legal advice, the public policy objectives and outcomes explained above, there are good grounds for LCC to conclude that providing the Grant will be consistent with a public policy objective of providing additional CSL accommodation in the West Lindsey area at a social rent for working-aged adults whose housing needs are not met by the market, and consistent with the public policy objective of addressing and reducing the health, social and economic disadvantages of working aged adults with learning disabilities, mental illness and/or physical disabilities in the Lincolnshire area.</p>								
<p><i>Principles B and F</i> - The subsidy is proportionate to the specific policy objective and limited to what is necessary to achieve the objective; and has been designed to achieve the objective whilst minimising any negative effects on competition and investment within the UK</p>	<p>The estimated project cost breakdown is as follows:</p> <p>TOTAL COST £4,691,737</p> <p>Investment includes:</p> <p>Grant Income:</p> <table border="0" style="width: 100%;"> <tr> <td>Homes England</td> <td style="text-align: right;">£600,000</td> </tr> <tr> <td>LCC</td> <td style="text-align: right;">£800,000</td> </tr> <tr> <td>WLDC</td> <td style="text-align: right;">£200,000</td> </tr> <tr> <td>TOTAL:</td> <td style="text-align: right;">£1,600,000</td> </tr> </table> <p>Acis investment: £3,091,737</p> <p>The Grant is considered to be proportionate in terms of its contribution to the specific policy objectives because:</p> <ul style="list-style-type: none"> • The proposed Grant of £800,000 is significantly outweighed by the forecast savings for LCC of £0.089m per annum over the thirty years during which it will enjoy nomination rights over the 10 supported accommodation units developed as part of this project. • Even when combined with the other public subsidies being provided for the project, the subsidy intensity rate is only circa 32%. • The terms on which the Grant will be provided will ensure that, taking account of the overall level of public subsidy for the project and the capital costs and operating costs and revenues associated with running the project over 30 years, the Grant does not exceed the maximum amount which can be provided by way of a subsidy for SPEI services in accordance with section 29(2) of the Subsidy Control Act 2022. 	Homes England	£600,000	LCC	£800,000	WLDC	£200,000	TOTAL:	£1,600,000
Homes England	£600,000								
LCC	£800,000								
WLDC	£200,000								
TOTAL:	£1,600,000								

Principles	How does the subsidy comply with the principle?
	<ul style="list-style-type: none"> • The parties have negotiated extensively and taken professional advice (including around land / property valuations) to ensure that LCC does not provide more public support than is necessary to facilitate the project being brought forward. <p>The subsidy has been designed to minimise any negative effects on competition and investment within the UK whilst still allowing it to meet the policy objectives in the following way:</p> <ul style="list-style-type: none"> • The Grant is limited to a capital payment, paid in two equal tranches when building work on the units commences and when practical completion is achieved. • The Grant does not involve the provision of an ongoing subsidy to cover revenue costs. • The Grant will be ring fenced to avoid any cross subsidy for ACIS' other activities (commercial or not). • Monitoring and evaluation – the Funding Agreement through which the Grant will be provided will contain the mechanism required by section 29(6) of the Subsidy Control Act 2022 to ensure that regular checks are carried out during the 30 year delivery period and again at the end of that 30 year period to ensure that the subsidy provided to ACIS (when cumulated with any other subsidy provided for the project) does not exceed its costs of delivery plus a reasonable profit, and that any excess subsidy is recovered.
<p><i>Principle C</i> - The subsidy is designed to bring about a change of economic behaviour of the beneficiary that is conducive to achieving the objective and that would not be achieved in the absence of the subsidy being provided.</p>	<p>To be consistent with this principle, providing the Grant must result in a change in economic behaviour by ACIS in a way conducive to achieving the objective and which would not otherwise happen. As explained in more detail in the next paragraphs, ACIS has told LCC that the project would not proceed without the Grant, and there are therefore good grounds for concluding that this principle will be satisfied.</p> <p>ACIS has confirmed as follows:</p> <p>“The total capital cost attributable to the development of CSL is considerably higher than lower levels of supported housing. In addition to providing a safe and secure home, CSL incorporates a wide range of communal facilities that support independent living. It is a means of preventing long-term care through the provision of enhanced care and support services. It is the additional communal facilities that result in a much higher capital cost. To ensure that the project is viable, both from a capital and ongoing revenue perspective, the project is reliant upon various means of funding. Without which, the project would not come to fruition.</p> <p>Our successful collaborative approach resulted in exploring a nomination and associated funding agreement in support of the Councils strategic priorities. The associated receipt of which would be invested towards the capital cost of the proposed project. The ongoing agreement for a term in which it is hoped that nominations will also assist in the allocation process and reduce the risk of voids/vacant accommodation, supporting affordability for tenants and ensuring viability for the Association. Without the use of this receipt generated</p>

Principles	How does the subsidy comply with the principle?
	<p>from a nomination agreement [i.e., the Grant], the project would not proceed.”</p> <p>No substantive works have commenced, which is further evidence that ACIS would not be willing to deliver the project without the Grant.</p> <p>Scenario in the absence of the subsidy - If LCC did not provide the Grant, it is considered that the project would not come to fruition leading to 10 less units of CSL accommodation in the West Lindsey area. As a result, LCC would continue to have to fund more costly residential and nursing care services for 10 more adults, which would increase revenue costs for LCC in the medium and long term. Furthermore, service users would be more limited in their choice of accommodation and, in particular, there would be less availability of CSL accommodation which maximises their independence and helps facilitate their access to services within the local community. In turn, LCC would be unable to reinvest the resources it forecasts it will save if the project is delivered, into more preventative measures which would contribute to a long-term cost reduction in care provision.</p>
<p><i>Principle D</i> - The subsidy should not normally compensate for the costs the beneficiary would have funded in the absence of any subsidy.</p>	<p>Acis Group is a charity specialising in housing and support services across communities for vulnerable people, including in Greater Lincolnshire, Yorkshire, Nottinghamshire, Derbyshire and surrounding areas. It operates in accordance with its rules, Model 2015, published by the National Housing Federation. There is no legal obligation upon ACIS to proceed with the proposed development of CSL within Market Rasen, and it will therefore not be receiving a subsidy for costs that it would itself have funded in the absence of the Grant. It is its vision, mission and objectives that determine and drive its commitment to continue to respond to the needs and demands of Lincolnshire residents within the area of its operation. In addition, there are no legal agreements in place that require ACIS to develop the above project.</p> <p>LCC’s contribution will enable ACIS to develop 10 CSL units for working-age adults with a disability, ensuring that the project is viable and, following research, will respond to the level of identified need and demand within the locality of the project.</p>
<p><i>Principle E</i> - The subsidy is an appropriate policy instrument to achieve a public policy objective and that objective cannot be achieved through other less distortive means.</p>	<p>It is LCC’s view that it is reasonable to conclude providing subsidy is the most appropriate way to achieving the specific policy objectives for the following reasons.</p> <p>Firstly, we understand from ACIS that the project will not be financially viable without the Grant. As outlined above, there will be a mechanism in the Funding Agreement to ensure that the amount of the Grant is limited to what is required to meet the costs of the project whilst allowing ACIS to make a reasonable profit, assessed over a period of 30 years.</p> <p>An alternative intervention, such as the provision by LCC of a guarantee to enable ACIS to borrow the required funding from a private sector funder will not be sufficient to close the viability gap associated with the project. This approach would result in ACIS having to access funding on commercial terms, which would increase the overall project costs for ACIS, thus widening the viability gap. If LCC’s support took the form of a guarantee to a private sector funder, we understand that the project would remain unviable for ACIS and a subsidy from LCC in this form would therefore not achieve the specific policy objective. The provision of a public sector guarantee at a subsidised rate (or without charge) could also result in an indirect subsidy being provided to the lender.</p>

Principles	How does the subsidy comply with the principle?
	<p>LCC has also considered providing a loan (of the value of the Grant) to ACIS. A loan at a market rate of interest would not involve a subsidy at all, and a loan at a subsidised rate of interest would result in a considerably smaller subsidy than the Grant. Providing the support in the form of a loan would therefore be less distortive than providing the support in the form of a grant. However, we understand from ACIS that the project is not financially viable without a grant and as such it is our view that the project would be even less financially viable if LCC's support was provided in the form of a repayable loan (whether at a market rate or a subsidised rate of interest).</p>
<p>Principle G - The subsidies' beneficial effects (in terms of achieving the objective) outweigh any negative effects, in particular the negative effect on competition and investment within the UK; and international trade or investment.</p>	<p>The proposed Grant supports a project which will deliver 10 Community Supported Living (CSL) units for Working Aged Adults with learning disabilities, mental illness, and/or physical disabilities, to support anticipated demand in the West Lindsey District. As well as the 10 units of supported accommodation, the project will deliver communal facilities with access to 24/7 on-site care and support provision which will be commissioned by LCC. The project will make alternative accommodation available for service users which will maximise their independence, promote their inclusivity within the local community and facilitate their access to services within the local community in close proximity to their social networks.</p> <p>The project will also contribute towards the following LCC Corporate Plan Strategies:</p> <ul style="list-style-type: none"> • Adult Frailty and Long-Term Conditions • Special Adult Services • Carers • Adult Safeguarding • Wellbeing <p>In return for Grant, LCC will be given nomination rights in relation to all 10 units over a 30 year period.</p> <p>It is considered that the Grant's positive effects outweigh the negative effects because:</p> <ul style="list-style-type: none"> • the Grant is to be provided for SPEI services and its use will be restricted for that purpose. SPEIs are defined in the Subsidy Control Act 2022 as services provided in the public interest and as such will have significant beneficial effects in relation to achieving the specific policy objectives outlined above. The benefits of the project include: <ul style="list-style-type: none"> - An additional 10 units of CSL accommodation contributing to the current and projected need and the local economy - Reduction/diversion in LCC's long-term costs of care provision - Increasing the availability of suitable housing and provides appropriate flexible care provision - Supporting people with learning disabilities, mental health illness, and/or physical disabilities within Lincolnshire to stay within their local communities - Multiple care needs can be managed on one site by one provider - Promotes independence and enhances wellbeing - Reduces/avoids admission to hospital, consequently expanding hospital bed capacity - Release of local housing for rent and sale to benefit families

Principles	How does the subsidy comply with the principle?
	<ul style="list-style-type: none"> - Excellent day-to-day services ensuring the quality of the scheme environment - A genuinely affordable proposition with a focus on value for money. -Additional employment opportunities <ul style="list-style-type: none"> • The project and the associated nomination rights for LCC will create annual cost savings to LCC of approximately £0.089m over the 30-year period during which LCC has nomination rights. LCC intends to reinvest the money saved into similar projects for adult housing and care. <p>It is considered that any distortions of competition, trade or investment from the Grant will be limited, since:</p> <ul style="list-style-type: none"> • The project is very small in size and will deliver just 10 residential units. • The size of the Grant (£800,000) is very small in real terms in the context of a project of this type. • The overall public subsidy, including the contributions from Homes England and West Lindsey District Council, is limited to an intervention rate of 32%. • ACIS will not, under the grant agreement, be entitled to generate more than a reasonable level of profit from the project over its 30 year term. • LCC will secure nomination rights for all 10 units of CSL and so will be in a position to ensure that they are all used for to local residents, rather than being available to service users from outside the UK or even from other areas within the UK. This will help to ensure that there is no undue distortion of competition, trade or investment. • The project will deliver CSL for rent rather than for sale as affordable shared ownership property, which means the opportunity to develop this project is likely to be of less interest to those investing for a commercial return. • The project is only financially viable with the Grant (and the other public subsidy which has been secured for the project), indicating it would not be commercially attractive to others in the same market. • Whilst there are other housing providers either already active in the Lincolnshire area or who may be willing to becoming active in the Lincolnshire area, the low sale and rental value of property in the area compared to other areas of the United Kingdom affects the viability of developments and means that competition for opportunities in the Lincolnshire area is relatively low. LCC continues to face challenges in sourcing housing providers to develop accommodation.

Principles	How does the subsidy comply with the principle?
	<ul style="list-style-type: none"> Through its Extra Care Housing programme, LCC plans to invest £12.89m over a number of years in supported accommodation. This has created, and will continue to create, opportunities for developers to build schemes in the local area, thus mitigating any distortions of competition as a result of ACIS benefitting from public subsidy in relation to this particular project.
Prohibited subsidies	The Grant does not fall within a prohibited category.

Equality Impact Analysis to enable informed decisions

The purpose of this document is to:-

- I. help decision makers fulfil their duties under the Equality Act 2010 and
- II. for you to evidence the positive and adverse impacts of the proposed change on people with protected characteristics and ways to mitigate or eliminate any adverse impacts.

Using this form

This form must be updated and reviewed as your evidence on a proposal for a project/service change/policy/commissioning of a service or decommissioning of a service evolves taking into account any consultation feedback, significant changes to the proposals and data to support impacts of proposed changes. The key findings of the most up to date version of the Equality Impact Analysis must be explained in the report to the decision maker and the Equality Impact Analysis must be attached to the decision making report.

****Please make sure you read the information below so that you understand what is required under the Equality Act 2010****

Equality Act 2010

The Equality Act 2010 applies to both our workforce and our customers. Under the Equality Act 2010, decision makers are under a personal duty, to have due (that is proportionate) regard to the need to protect and promote the interests of persons with protected characteristics.

Protected characteristics

The protected characteristics under the Act are: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; sexual orientation.

Section 149 of the Equality Act 2010

Section 149 requires a public authority to have due regard to the need to:

- Eliminate discrimination, harassment, victimisation, and any other conduct that is prohibited by/or under the Act
- Advance equality of opportunity between persons who share relevant protected characteristics and persons who do not share those characteristics
- Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

The purpose of Section 149 is to get decision makers to consider the impact their decisions may or will have on those with protected characteristics and by evidencing the impacts on people with protected characteristics decision makers should be able to demonstrate 'due regard'.

Decision makers duty under the Act

Having had careful regard to the Equality Impact Analysis, and also the consultation responses, decision makers are under a personal duty to have due regard to the need to protect and promote the interests of persons with protected characteristics (see above) and to:-

- (i) consider and analyse how the decision is likely to affect those with protected characteristics, in practical terms,
- (ii) remove any unlawful discrimination, harassment, victimisation and other prohibited conduct,
- (iii) consider whether practical steps should be taken to mitigate or avoid any adverse consequences that the decision is likely to have, for persons with protected characteristics and, indeed, to consider whether the decision should not be taken at all, in the interests of persons with protected characteristics,
- (iv) consider whether steps should be taken to advance equality, foster good relations and generally promote the interests of persons with protected characteristics, either by varying the recommended decision or by taking some other decision.

Conducting an Impact Analysis

The Equality Impact Analysis is a process to identify the impact or likely impact a project, proposed service change, commissioning, decommissioning or policy will have on people with protected characteristics listed above. It should be considered at the beginning of the decision making process.

The Lead Officer responsibility

This is the person writing the report for the decision maker. It is the responsibility of the Lead Officer to make sure that the Equality Impact Analysis is robust and proportionate to the decision being taken.

Summary of findings

You must provide a clear and concise summary of the key findings of this Equality Impact Analysis in the decision making report and attach this Equality Impact Analysis to the report.

Impact – definition

An impact is an intentional or unintentional lasting consequence or significant change to people's lives brought about by an action or series of actions.

How much detail to include?

The Equality Impact Analysis should be proportionate to the impact of proposed change. In deciding this asking simple questions “Who might be affected by this decision?” “Which protected characteristics might be affected?” and “How might they be affected?” will help you consider the extent to which you already have evidence, information and data, and where there are gaps that you will need to explore. Ensure the source and date of any existing data is referenced.

You must consider both obvious and any less obvious impacts. Engaging with people with the protected characteristics will help you to identify less obvious impacts as these groups share their perspectives with you.

A given proposal may have a positive impact on one or more protected characteristics and have an adverse impact on others. You must capture these differences in this form to help decision makers to arrive at a view as to where the balance of advantage or disadvantage lies. If an adverse impact is unavoidable then it must be clearly justified and recorded as such, with an explanation as to why no steps can be taken to avoid the impact. Consequences must be included.

Proposals for more than one option If more than one option is being proposed you must ensure that the Equality Impact Analysis covers all options. Depending on the circumstances, it may be more appropriate to complete an Equality Impact Analysis for each option.

The information you provide in this form must be sufficient to allow the decision maker to fulfil their role as above. You must include the latest version of the Equality Impact Analysis with the report to the decision maker. Please be aware that the information in this form must be able to stand up to legal challenge.

Background Information

Title of the policy / project / service being considered	Adult Care Capital Programme – Extra Care Housing and Supported Living Programme	Person / people completing analysis	Emma Rowitt
Service Area	Adult Care and Community Wellbeing	Lead Officer	Glen Garrod
Who is the decision maker?	Glen Garrod	How was the Equality Impact Analysis undertaken?	Desktop exercise updated after engagement and consultation
Date of meeting when decision will be made	05/04/2023	Version control	1.0
Is this proposed change to an existing policy/service/project or is it new?	New	LCC directly delivered, commissioned, re-commissioned or de-commissioned?	Commissioned
Describe the proposed change	<p>Lincolnshire County Council's (LCC) Extra Care Housing (ECH) and Supported Living Capital Programme, working in partnership with District Councils and Housing Associations, is intended to help older people and working-age adults with a disability to achieve greater independence and improve wellbeing, by offering additional housing and care options within local communities. ECH and Supported Living accommodation is flexibly designed to respond to developing care needs. Accommodation comes in many built forms with access to on-site care and support, and often includes a variety of communal facilities and activities.</p> <p>The Programme objectives are:</p> <ul style="list-style-type: none"> • Promote and enable independence • Improve the well-being of older aged people and adults of working-age with a disability within our community • Enhance quality of life through enabling people to stay within their local community • Enable Lincolnshire residents to access services closer to home and social circles 		

- Assist with meeting the need and demand for additional housing options
- Help to reduce pressures on funding attached to domiciliary and residential care
- Illustrate the scope of innovate partnership in developing and supporting ECH and Supported Living within the county
- Ensure communication coverage is as much about people as process, identifying benefits through case studies
- Encourage people remain in a home of their own, connected to their local community, where they can be supported by their social networks to live meaningful and independent lives.

The development of ECH and Supported Living has been supported by the Council's Executive, Scrutiny and Portfolio Holders since 2014. Adult social care budgets are continuing to come under increased demand as a result of funding restrictions, the changing demographics of the county with an ageing population, increased requirement for adult care services, and in particular residential care. ECH and Supported Living has been shown nationally to be a cost-effective way to help reduce demand for more expensive long-term services.

ECH and Supported Living presents an opportunity to generate a sustainable future for health and social care in Lincolnshire, meeting a key ambition of the sustainable services review. LCC is committed to supporting older people and working-age adults with a disability to stay independent within their own homes and, reduce (or limit) the use of long-term residential services. The authority has signalled its intent to expand the range of community based services, in conjunction with reducing residential placements. By helping to divert people from moving into residential settings, the ECH and Supported Living Programme will enable LCC to reinvest resources in preventative services.

The closure of the eight LCC owned and managed residential homes eight years ago emphasised the need for modernised services such as ECH and Supported Living, which are fit for purpose in the 21st century. The Programme will contribute to reshaping Adult Social Care services and opportunities in line with both national best practice and local priorities.

ECH and Supported Living has been shown nationally to be a cost-effective way to reduce demand for more expensive long-term services. The long-term effect of this capital strategy will be investment in an infrastructure which supports improvements in choice and diversity of provision, alongside increased independence for tenants. The vision is to provide an acceleration in LCC's ability to shift resources away from high-cost buildings-based services into more appropriate integrated community options.

Furthermore, ECH and Supported Living has several health and wellbeing benefits:

- Individual tenancies provide privacy whilst communal spaces provide an area to meet others and the opportunity to engage in group activities
- Access to 24-hour care and support can provide flexibility across a range of individuals
- Provide peace of mind, safety, and security
- Improved physical and mental health
- Maintain and develop links with the community

- Maximise incomes (includes benefits income) and reduce fuel poverty
- Environment is more likely to be free from hazards, safe from harm and promotes a sense of security, enabling movement around the home, including to visitors
- Facilitates downsizing to more suitable housing, thus freeing up larger homes for the choice-based letting and/or sales markets
- Delays and reduces the need for primary care and social care interventions including admission to long term care settings and hospital admissions
- Routine GP appointments for extra care residents fell by 46% after a year
- Falls rates in ECH measured at 31% compared to 49% in general housing.

This Equality Impact Analysis addresses the equalities implications of the ECH and Supported Living Programme.

This project, in partnership with ACIS Group will see the development of 10 apartments in Market Rasen for adults of working-age with a disability. The scheme is due to commence construction in summer 2023. LCC will purchase nomination rights on all 10 apartments for a period of 30 years through a process of first refusal and no on-going void liability.

Evidencing the impacts

In this section you will explain the difference that proposed changes are likely to make on people with protected characteristics.

To help you do this first consider the impacts the proposed changes may have on people without protected characteristics before then considering the impacts the proposed changes may have on people with protected characteristics.

You must evidence here who will benefit and how they will benefit. If there are no benefits that you can identify please state 'No perceived benefit' under the relevant protected characteristic. You can add sub categories under the protected characteristics to make clear the impacts. For example under Age you may have considered the impact on 0-5 year olds or people aged 65 and over, under Race you may have considered Eastern European migrants, under Sex you may have considered specific impacts on men.

Data to support impacts of proposed changes

When considering the equality impact of a decision it is important to know who the people are that will be affected by any change.

Population data and the Joint Strategic Needs Assessment

The Lincolnshire Research Observatory (LRO) holds a range of population data by the protected characteristics. This can help put a decision into context. Visit the LRO website and its population theme page by following this link: <http://www.research-lincs.org.uk> If you cannot find what you are looking for, or need more information, please contact the LRO team. You will also find information about the Joint Strategic Needs Assessment on the LRO website.

Workforce profiles

You can obtain information by many of the protected characteristics for the Council's workforce and comparisons with the labour market on the [Council's website](#). As of 1st April 2015, managers can obtain workforce profile data by the protected characteristics for their specific areas using Agresso.

Positive impacts

The proposed change may have the following positive impacts on persons with protected characteristics – If no positive impact, please state 'no positive impact'.

<p>Age</p>	<p>The demographic trends for Lincolnshire indicate that there will be greater need for supported accommodation as the demand for social care increases.</p> <p>Evidential research indicates that supported accommodation is a cost-effective way to deliver care in comparison to residential and domiciliary care and promotes increased wellbeing and independence. The positive impacts for this cohort are:</p> <ul style="list-style-type: none">- The ability to stay within their local communities close to friends and family.- The ability to remain independent through having their own property, with their own front door.- Be supported in an environment where there is additional care and support should it be required and their needs develop and change, however, remain with their own home for as long as possible.- Access services closer to their home and network- The benefit of creating a social life and community, with social activities and events on offer, and the opportunity to make new friends.- The flexibility to be able to request additional support and care Improve the choice of housing options available within the county.- Multiple care needs can be managed on one site.- Benefit from new energy efficient accommodation.- The encouragement and opportunity for active lifestyles and social contact with other tenants.- The offer of a living and care environment which has a positive effect on people's health and well-being and prevents or reduces the need for health care interventions.
<p>Disability</p>	<p>The accommodation and Supported Living as a model is available to people with a range of needs including those with both physical, learning disabilities, mental health, which means the positive impacts of supported accommodation are also available to people with a disability where the nature of the scheme allows.</p> <p>The positive impacts are outlined below.</p> <ul style="list-style-type: none">- The ability to stay within their local communities close to friends and family.- Remain independent through having their own property, with their own front door.- Be supported in an environment where there is additional care and support should it be required.

	<ul style="list-style-type: none"> - Access services closer to their home and network. - The benefit of creating a social life and community, with social activities and events on offer, and the opportunity to make new friends. - The flexibility to be able to request additional support and care should their needs develop and change whilst remaining within their own home for as long as possible. - Improve the choice of housing options available within the county. - Multiple care needs can be managed on one site. - Benefit from new energy efficient accommodation. - The encouragement and opportunity for active lifestyles and social contact with other residents. - The offer of a living and care environment which has a positive effect on people's health and well-being and prevents or reduces the need for health care interventions. <p>Funding and Nomination agreements for any project within the programme will oblige all parties to comply with the Equality Act 2010 in the delivery of ECH and Supported Living accommodation.</p>
Gender reassignment	<p>No positive impact</p> <p>All schemes will be available to potential residents regardless of this protected characteristic. ECH and Supported Living accommodation is inclusive and enables people of all protected characteristics to:</p> <ul style="list-style-type: none"> • Remain in a home of their own, connected to their local community, where they can be supported by their social networks to live meaningful and independent lives. • Maintain and develop links with the community. • Increase their quality of life; • Access services within their local communities. <p>The Funding and Nomination agreements for any project within the programme will oblige all parties to comply with the Equality Act 2010 in the delivery of ECH and Supported Living accommodation.</p>
Marriage and civil partnership	<p>No positive impact</p> <p>All schemes will be available to potential residents regardless of this protected characteristic. ECH and Supported Living accommodation is inclusive and enables people of all protected characteristics to:</p> <ul style="list-style-type: none"> • Remain in a home of their own, connected to their local community, where they can be supported by their social networks to live meaningful and independent lives. • Maintain and develop links with the community. • Increase their quality of life; • Access services within their local communities. <p>The Funding and Nomination agreements for any project within the programme will oblige all parties to comply with the Equality Act 2010 in the delivery of ECH and Supported Living accommodation.</p>

Pregnancy and maternity	<p>No positive impact</p> <p>All schemes will be available to potential residents regardless of this protected characteristic. ECH and Supported Living accommodation is inclusive and enables people of all protected characteristics to:</p> <ul style="list-style-type: none"> • Remain in a home of their own, connected to their local community, where they can be supported by their social networks to live meaningful and independent lives. • Maintain and develop links with the community. • Increase their quality of life; • Access services within their local communities. <p>The Funding and Nomination agreements for any project within the programme will oblige all parties to comply with the Equality Act 2010 in the delivery of ECH and Supported Living accommodation.</p>
Race	<p>No positive impact</p> <p>All schemes will be available to potential residents regardless of this protected characteristic. ECH and Supported Living accommodation is inclusive and enables people of all protected characteristics to:</p> <ul style="list-style-type: none"> • Remain in a home of their own, connected to their local community, where they can be supported by their social networks to live meaningful and independent lives. • Maintain and develop links with the community. • Increase their quality of life; • Access services within their local communities. <p>The Funding and Nomination agreements for any project within the programme will oblige all parties to comply with the Equality Act 2010 in the delivery of ECH and Supported Living accommodation.</p>
Religion or belief	<p>No positive impact</p> <p>All schemes will be available to potential residents regardless of this protected characteristic. ECH and Supported Living accommodation is inclusive and enables people of all protected characteristics to:</p> <ul style="list-style-type: none"> • Remain in a home of their own, connected to their local community, where they can be supported by their social networks to live meaningful and independent lives. • Maintain and develop links with the community. • Increase their quality of life; • Access services within their local communities. <p>The Funding and Nomination agreements for any project within the programme will oblige all parties to comply with the Equality Act 2010 in the delivery of ECH and Supported Living accommodation</p>
Sex	<p>No positive impact</p> <p>All schemes will be available to potential residents regardless of this protected characteristic. ECH and Supported Living accommodation is inclusive and enables people of all protected characteristics to:</p>

	<ul style="list-style-type: none"> • Remain in a home of their own, connected to their local community, where they can be supported by their social networks to live meaningful and independent lives. • Maintain and develop links with the community. • Increase their quality of life; • Access services within their local communities. <p>The Funding and Nomination agreements for any project within the programme will oblige all parties to comply with the Equality Act 2010 in the delivery of ECH and Supported Living accommodation</p>
Sexual orientation	<p>No positive impact</p> <p>All schemes will be available to potential residents regardless of this protected characteristic. ECH and Supported Living accommodation is inclusive and enables people of all protected characteristics to:</p> <ul style="list-style-type: none"> • Remain in a home of their own, connected to their local community, where they can be supported by their social networks to live meaningful and independent lives. • Maintain and develop links with the community. • Increase their quality of life; • Access services within their local communities. <p>The Funding and Nomination agreements for any project within the programme will oblige all parties to comply with the Equality Act 2010 in the delivery of ECH and Supported Living accommodation</p>

If you have identified positive impacts for other groups not specifically covered by the protected characteristics in the Equality Act 2010 you can include them here if it will help the decision maker to make an informed decision.

ECH Supported Living accommodation and the development of any such scheme, including this project has a range of benefits:

- The development of additional housing contributing to the current and projected needs.
- Reduction in the long-term costs of care provision.
- Strengthening the partnership with district councils and housing associations, as well as other One Public Estate (OPE) partners.
- Increasing the availability of suitable housing with the most appropriate care provision.
- The opportunity to develop more community based services.
- Supporting residents within Lincolnshire to stay within their local communities as they grow older.
- Multiple care needs can be managed on one site.
- Decreased risk of service users going 'missing' with ability to monitor location.
- Option available for one care provider managing the site care needs.
- New energy efficient accommodation.
- Opportunity for added social value through developing a workforce development plan.

- Bringing vacant sites back into use, enhancing the local community.
- Promote independence for residents and other service users.
- Encourage active lifestyles and social contact for residents and other service users.
- Offer a living and care environment which has a positive effect on people's health and well-being and prevents or reduces the need for health care interventions.
- Supports the Council's 'One Council' ethos.
- Supports the Council's Corporate Plan and its objectives and priorities.
- Supports the Council's Homes for Independence blueprint.
- ECH and Supported Living accommodation has been shown nationally to be a cost-effective way to reduce demand for more expensive long-term services.
- The evidence from the Housing LIN indicates there is not currently a balance of specialised housing choices available for the older population and adults of working-age with a disability in Greater Lincolnshire – LCC's ECH and Supported Living programme will help to alleviate this issue.
- Lincolnshire has a higher than average number of older people. 177k people aged 65+ lived in Lincolnshire as of the middle of 2018 which constitutes 25% of the population (18% nationally). These numbers are predicted to increase by 40% to 250k by 2040. LCC's ECH and Supported Living programme will help to support the aging population and provide services which are sustainable.
- Lincolnshire has the fourth highest national rate of admission to care within residents aged 65+, and current estimates indicate the admission rate is not decreasing. Lincolnshire also had the fourth highest number of permanent residents in care by population. LCC's ECH and Supported Living programme is one scheme of work which will help with the reduction of this categorization.
- ECH and Supported Living accommodation has been shown nationally to be a cost-effective way to reduce demand for more expensive long term services.
- The weekly cost of standard residential care is in the region of £550 per week. The expected costs of providing high level support in extra care (20 hours) would be £310 per week.
- Additional use of, and income to, local businesses e.g. leisure centre, cafes, bus service.
- Additional employment opportunities e.g. on-site management/concierge provision, care provision, building construction, and site maintenance.
- Greater use of community facilities, thus supporting their longevity (e.g. GP surgeries).
- People in ECH and Supported Living accommodation can potentially use less care hours than if in the community, for example, if meals are provided by the scheme, less care hours may be required in preparing food etc.
- Accommodation is economic to heat and is of an appropriate and manageable size.
- Support and care services can be targeted to those who need them and can flex with people's changing circumstances.
- Additional efficiencies can be gained by delivering care to several people on one site, reducing travel and mileage costs associated with domiciliary care in the community, and giving increased flexibility in the delivery of that care.
- Residents providing volunteering in the community, with time banks, fundraising and befriending.
- People remain in a home of their own, connected to their local community, where they can be supported by their social networks to live meaningful and independent lives.
- Individual tenancies provide privacy whilst communal spaces provide an area to meet others and the opportunity to engage in group activities.
- 24-hour care and support which schemes can provide flexibility across a range of people.
- Provide peace of mind, safety, and security.
- Improved physical and mental health.
- Maintain and develop links with the community.
- Maximise incomes (includes benefits income) and reduce fuel poverty.

- Environment is more likely to be free from hazards, safe from harm and promotes a sense of security, enabling movement around the home, including to visitors.
- Facilitates downsizing to more suitable housing, thus freeing up larger homes for the choice-based letting and/or sales markets.
- Delays and reduces the need for primary care and social care interventions including admission to long term care settings and hospital admissions. Unplanned hospital admissions reduce from 8-14 days to 1-2 days. Over a 12 month period total NHS costs (including GP visits, practice and district nurse visits and hospital appointments and admissions) reduce by 38% for extra care residents.
- Routine GP appointments for extra care residents fell by 46% after a year.
- Falls rates in ECH measured at 31% compared to 49% in general housing.
- Offer choice and self-direction or co-production of services.
- Be flexible in its style of service delivery so that services respond well to people's changing needs.
- Release of local housing for rent and sale to benefit further families.
- Moderating the burden of family members caring at home.
- Evidence shows that living in familiar, safe, accessible, warm accommodation that we call 'home' is more likely to promote mental and physical wellbeing. Reduce hospital admissions, social isolation and loneliness.
- New facilities developed in the local area for wider community use.
- Couples can avoid being separated as they can live together in ECH accommodation, even if only one is in need of care.

Adverse/negative impacts

You must evidence how people with protected characteristics will be adversely impacted and any proposed mitigation to reduce or eliminate adverse impacts. An adverse impact causes disadvantage or exclusion. If such an impact is identified please state how, as far as possible, it is justified; eliminated; minimised or counter balanced by other measures.

If there are no adverse impacts that you can identify please state 'No perceived adverse impact' under the relevant protected characteristic.

Negative impacts of the proposed change and practical steps to mitigate or avoid any adverse consequences on people with protected characteristics are detailed below. If you have not identified any mitigating action to reduce an adverse impact please state 'No mitigating action identified'.

Age	No negative impact identified. No mitigating action required.
Disability	ECH and Supported Living accommodation must be designed suitability to meet needs of disabled people. The mitigation is that the design of scheme will be in line with the Equalities Act i.e. Disability Discrimination and in line with HAPPI guidelines.
Gender reassignment	No perceived adverse impact. All schemes will be available to potential residents regardless of this protected characteristic. The Funding and Nomination agreements for any project within the programme will oblige all parties to comply with the Equality Act 2010 in the delivery of ECH and Supported Living accommodation
Marriage and civil partnership	No perceived adverse impact All schemes will be available to potential residents regardless of this protected characteristic. The Funding and Nomination agreements for any project within the programme will oblige all parties to comply with the Equality Act 2010 in the delivery of ECH and Supported Living accommodation.
Pregnancy and maternity	No perceived adverse impact All schemes will be available to potential residents regardless of this protected characteristic. The Funding and Nomination agreements for any project within the programme will oblige all parties to comply with the Equality Act 2010 in the delivery of ECH and Supported Living accommodation

Race	No perceived adverse impact All schemes will be available to potential residents regardless of this protected characteristic. The Funding and Nomination agreements for any project within the programme will oblige all parties to comply with the Equality Act 2010 in the delivery of ECH and Supported Living accommodation.
Religion or belief	No perceived adverse impact All schemes will be available to potential residents regardless of this protected characteristic. The Funding and Nomination agreements for any project within the programme will oblige all parties to comply with the Equality Act 2010 in the delivery of ECH and Supported Living accommodation
Sex	No perceived adverse impact All schemes will be available to potential residents regardless of this protected characteristic. The Funding and Nomination agreements for any project within the programme will oblige all parties to comply with the Equality Act 2010 in the delivery of ECH and Supported Living accommodation.
Sexual orientation	No perceived adverse impact All schemes will be available to potential residents regardless of this protected characteristic The Funding and Nomination agreements for any project within the programme will oblige all parties to comply with the Equality Act 2010 in the delivery of ECH and Supported Living accommodation

If you have identified negative impacts for other groups not specifically covered by the protected characteristics under the Equality Act 2010 you can include them here if it will help the decision maker to make an informed decision.

Any stakeholder who LCC will partner with to develop ECH and Supported Living accommodation will be expected to develop their own Equality Impact Assessment and in doing so identify whether their actions would have any negative impacts. This will provide evidence that LCC's stakeholders are actively engaging the local community and potential future users.

Stakeholders

Stake holders are people or groups who may be directly affected (primary stakeholders) and indirectly affected (secondary stakeholders)

You must evidence here who you involved in gathering your evidence about benefits, adverse impacts and practical steps to mitigate or avoid any adverse consequences. You must be confident that any engagement was meaningful. The Community engagement team can help you to do this and you can contact them at consultation@lincolnshire.gov.uk

State clearly what (if any) consultation or engagement activity took place by stating who you involved when compiling this EIA under the protected characteristics. Include organisations you invited and organisations who attended, the date(s) they were involved and method of involvement i.e. Equality Impact Analysis workshop/email/telephone conversation/meeting/consultation. State clearly the objectives of the EIA consultation and findings from the EIA consultation under each of the protected characteristics. If you have not covered any of the protected characteristics please state the reasons why they were not consulted/engaged.

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Objective(s) of the EIA consultation/engagement activity

As each project gets underway within the programme, engagement will be undertaken with various groups, such as the ones listed below about likely impacts to inform this Equality Impact Analysis as the programme progresses.

- LCC Corporate Diversity Steering Group;
- Peoples Partnership;
- Age UK;
- LCC Black and Ethnic Minority Staff Engagement Group;
- LCC LGBT staff Group; and
- LCC Disability staff engagement Group.

Who was involved in the EIA consultation/engagement activity? Detail any findings identified by the protected characteristic

Age

- LCC staff Carers Network;
- LCC Corporate Diversity Steering Group;
- LCC Black and Ethnic Minority Staff Engagement Group;
- LCC LGBT staff Group;
- LCC Disability staff engagement Group;
- Age UK;
- University of the Third Age (U3A) network;
- JUST Lincolnshire;
- Lincolnshire Independent Living;
- Pelican Trust (adult disability/learning difficulties);
- Lincoln and Lindsey Blind Society;
- Carers FIRST; and
- People's Partnership.

Findings from engagement carried out to date are as follows:

- The more supported housing the better to ensure independence for all.
- Allocation based on needs as in ECH already in operation would also need to take account of community dynamics within the housing scheme to maintain a stable non-judgmental supportive environment for all tenants.
- Some of the ECH has age limits set by LCC but not the housing association – this is actually based on Homes England funding allocated to the scheme and the funding restrictions.
- Not much support readily available to be able to assist this age group to live independently
- This project has the potential to help disabled people to overcome barriers they face through a current shortage of suitable housing and support. This should support disabled people to achieve independent living and have their full civil rights.
- My experience of extra care housing has meant younger people are able to live more independently, rather than having to be in a residential home, further to this, it has meant some married couples can be more safely support without one having to live in a residential home.

Disability	<ul style="list-style-type: none"> • LCC staff Carers Network; • LCC Corporate Diversity Steering Group; • LCC Black and Ethnic Minority Staff Engagement Group; • LCC LGBT staff Group; • LCC Disability staff engagement Group; • Age UK; • University of the Third Age (U3A) network; • JUST Lincolnshire; • Lincolnshire Independent Living; • Pelican Trust (adult disability/learning difficulties); • Lincoln and Lindsey Blind Society; • Carers FIRST; and • People's Partnership. <p>Findings from engagement carried out to date are as follows:</p> <ul style="list-style-type: none"> • The opportunity for additional extra care and supported living accommodation in the community for people who may be frail or have some form of disability will be tremendously beneficial and enable people to continue to live in the community for longer and more inclusively rather than potentially having to move into residential care. The benefits of a monitoring mechanism is enormous for many, they may not need hands on care but support as and when or just in case or just to know support is available has a great effect upon others. • This type of accommodation where people with a disability can have their own home/ own front door with support available when required is invaluable in promoting independence.
Gender reassignment	<ul style="list-style-type: none"> • LCC staff Carers Network; • LCC Corporate Diversity Steering Group; • LCC Black and Ethnic Minority Staff Engagement Group; • LCC LGBT staff Group; • LCC Disability staff engagement Group; • Age UK; • University of the Third Age (U3A) network; • JUST Lincolnshire; • Lincolnshire Independent Living; • Pelican Trust (adult disability/learning difficulties); • Lincoln and Lindsey Blind Society; • Carers FIRST; and • People's Partnership.

Marriage and civil partnership	<ul style="list-style-type: none"> • LCC staff Carers Network; • LCC Corporate Diversity Steering Group; • LCC Black and Ethnic Minority Staff Engagement Group; • LCC LGBT staff Group; • LCC Disability staff engagement Group; • Age UK; • University of the Third Age (U3A) network; • JUST Lincolnshire; • Lincolnshire Independent Living; • Pelican Trust (adult disability/learning difficulties); • Lincoln and Lindsey Blind Society; • Carers FIRST; and • People's Partnership.
Pregnancy and maternity	<ul style="list-style-type: none"> • LCC staff Carers Network; • LCC Corporate Diversity Steering Group; • LCC Black and Ethnic Minority Staff Engagement Group; • LCC LGBT staff Group; • LCC Disability staff engagement Group; • Age UK; • University of the Third Age (U3A) network; • JUST Lincolnshire; • Lincolnshire Independent Living; • Pelican Trust (adult disability/learning difficulties); • Lincoln and Lindsey Blind Society; • Carers FIRST; and • People's Partnership.

<p>Race</p>	<ul style="list-style-type: none"> • LCC staff Carers Network; • LCC Corporate Diversity Steering Group; • LCC Black and Ethnic Minority Staff Engagement Group; • LCC LGBT staff Group; • LCC Disability staff engagement Group; • Age UK; • University of the Third Age (U3A) network; • JUST Lincolnshire; • Lincolnshire Independent Living; • Pelican Trust (adult disability/learning difficulties); • Lincoln and Lindsey Blind Society; • Carers FIRST; and • People's Partnership.
<p>Religion or belief</p>	<ul style="list-style-type: none"> • LCC staff Carers Network; • LCC Corporate Diversity Steering Group; • LCC Black and Ethnic Minority Staff Engagement Group; • LCC LGBT staff Group; • LCC Disability staff engagement Group; • Age UK; • University of the Third Age (U3A) network; • JUST Lincolnshire; • Lincolnshire Independent Living; • Pelican Trust (adult disability/learning difficulties); • Lincoln and Lindsey Blind Society; • Carers FIRST; and • People's Partnership.
<p>Sex</p>	<ul style="list-style-type: none"> • LCC staff Carers Network; • LCC Corporate Diversity Steering Group; • LCC Black and Ethnic Minority Staff Engagement Group; • LCC LGBT staff Group; • LCC Disability staff engagement Group; • Age UK; • University of the Third Age (U3A) network;

	<ul style="list-style-type: none"> • JUST Lincolnshire; • Lincolnshire Independent Living; • Pelican Trust (adult disability/learning difficulties); • Lincoln and Lindsey Blind Society; • Carers FIRST; and • People's Partnership.
<p>Sexual orientation</p>	<ul style="list-style-type: none"> • LCC staff Carers Network; • LCC Corporate Diversity Steering Group; • LCC Black and Ethnic Minority Staff Engagement Group; • LCC LGBT staff Group; • LCC Disability staff engagement Group; • Age UK; • University of the Third Age (U3A) network; • JUST Lincolnshire; • Lincolnshire Independent Living; • Pelican Trust (adult disability/learning difficulties); • Lincoln and Lindsey Blind Society; • Carers FIRST; and • People's Partnership.
<p>Are you confident that everyone who should have been involved in producing this version of the Equality Impact Analysis has been involved in a meaningful way?</p> <p>The purpose is to make sure you have got the perspective of all the protected characteristics.</p>	<p>Yes. Below are some generic comments which have been received during recent engagement activities.</p> <ul style="list-style-type: none"> • This could offer a lady on my case load the chance to return to living in the community but in a more supported environment, that could reduce the isolation she experienced in her last home which impacted her mental health. This lady lived in the community and had been able to develop a good lifestyle that suited her, however due to a move to a new neighbourhood she became more isolated and the impact this had on her mental health resulted in her living with family. Having people around she can chat and make friends with would enable this lady to return to the lifestyle she once had. • There is a desperate need for this type of accommodation in Lincolnshire as a whole. Any possibility of increasing the choices of where people can live and support that can be offered has to be a positive. • Extra care housing and Supported Living accommodation can only be a positive option as it gives people the personal freedom and independence while supporting with step up and step-down care.

Once the changes have been implemented how will you undertake evaluation of the benefits and how effective the actions to reduce adverse impacts have been?

There will be continued Council involvement in ECH and Supported Living development through the nominations process and the Council's presence on the Nominations Panel. Evaluation of benefits will be conducted through this process and on-going monitoring of the accommodation and through the ECH governance structures.

Further Details

Are you handling personal data?

No
If yes, please give details.

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Actions required	Action	Lead officer	Timescale
Include any actions identified in this analysis for on-going monitoring of impacts.	Review EIA as each engagement process is undertaken and the programme develops.	Emma Rowitt	On-going
Signed off by	Emma Rowitt	Date	24/11/2022