
Equalities Analysis Assessment

Review of Older Adults Day Services

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1. Summary

This document is the Equalities Analysis Assessment (EAA) of the proposed changes to Older Adults Day Services. It was originally drafted in April 2019 to accompany a proposal presented to Mayor and Cabinet to combine the 3 existing building based day services for older adults at Cinnamon Court, Cedar Court and the Calabash Centre into a single service based at the Calabash Centre. It was revised in October 2019 to ensure that it was sufficiently robust to reflect the formal consultation on the proposal.

The EAA considers how the proposed changes might affect different groups in society differently and assesses whether these effects are positive or negative. It also outlines the activity that the Council will take to ensure that equal opportunities are promoted, that no group is disproportionately discriminated against, and that any potentially negative impact is mitigated.

The EAA has found that the proposal to re-commission all older adults day services as a single service offer from a single location does not unlawfully discriminate against any group based on the protected characteristics. It is noted that the proposals will affect older people with disabilities more than any other group, as the majority of service users are older and have some level of disability. The EAA also considered issues relating to transport and length of travel for this group, particularly those people in Extra Care who do not currently travel to a day centre, as they are more likely to be physically frail. It is proposed that a greater range of travel options and providers will be used than original considered to ensure that journey times are no longer than the current 30-45 minutes a journey.

The proposal not to re-commission a stand-alone BAME (Black and Minority Ethnic) service will impact on people from BAME backgrounds, particularly those currently using the BAME specific commissioned service at the Calabash Centre. The consultation has also highlighted the history of the Calabash Centre where the BAME service is delivered, and its wider meaning for the Lewisham African Caribbean population. Specific consideration has been given to supporting and promoting the Active Elders Groups that operate from the Centre so that the wider BAME communities are more aware of this opportunity. The service specification for a combined single service will also include specific requirements for activities and the delivery of the service in an environment that reflects cultural and ethnic backgrounds and preferences and promotes a culture of respect for people from different cultures through a zero tolerance of discrimination.

Overall the assessment found that there would be a neutral impact on equalities. However, an assessment of individual needs will be carried out for each person affected by the proposal to ensure that the proposed single service will meet their specific individual care, support and cultural needs.

2. Introduction

Lewisham Council is committed to supporting all of its citizens to live full lives and maintain their health, wellbeing and independence. This includes older adults with disabilities and with social care needs. Where an individual is eligible for support from the Council, it will be from the perspective of empowering people, and where appropriate their families or carers, to take decisions and make choices as to how their needs can best be met, calling upon their own resources, those of the Council and its providers, and those available in the local community.

This review looks at Day Activities and Day Services which are available for older adults with care and support needs who are eligible under the Care Act 2014. Outcomes which can be supported by day services include, but aren't limited to:

- Developing and maintaining family or other personal relationships
- Managing and maintaining nutrition
- Maintaining personal hygiene
- Managing toilet needs

Adult Social Care currently provides building-based day care, Monday to Friday, at four services across the Borough: Calabash, Cinnamon Court, Cedar Court and Ladywell Dementia Day Service. The proposals considered in this EAA are:

1. To re-commission three older adults day services currently delivered at Cedar Court, Cinnamon Court and the Calabash Centre as a single service at a single location
2. That this service will not be BAME-Specific, but will support people from all backgrounds

The proposed changes to day services would be underpinned by the principles of the Care Act 2014 to ensure that it complies with current legislation. The Act's principles of promoting independence, offering choice; and considering the most appropriate, cost effective and least restrictive options for meeting people's needs are at the core of the proposed changes.

3. What is an Equalities Analysis Assessment

An Equalities Analysis Assessment (EAA) is the process of systematically analysing a proposed or existing policy, strategy or service to identify what effect, or likely effect, will follow from its implementation for different groups in the community. Assessments consider the effect of a proposal on the 'protected characteristics' of Race, Gender, Disability, Age, Sexual Orientation, Religion/Belief, Pregnancy and Maternity, Marriage and Civil Partnership, and Gender Reassignment. In addition, EAAs consider whether proposals might contravene human rights. By conducting an EAA, organisations can consider what good practice could be shared or what measures might need to be taken to address any adverse impact.

Lewisham's diversity is one of its strengths and the Council is committed to supporting an inclusive and cohesive local community. EAAs support this intention, by identifying how the Council's services can actively promote equal opportunities and avoid direct and indirect discrimination.

4. Scope and structure of the EAA

This document considers the equalities impact of the proposed changes to three commissioned building based day services for older adults. It draws upon information known to the Council to assess what effect the recommendation to combine three services into a single service will have on the people currently accessing these services, and the wider population of people aged over 65 in Lewisham who may have Care Act eligible needs in the future.

The EIA provides the answers to the following questions:

1. Could the proposed changes affect some groups in society differently?
2. Will the proposed changes disproportionately affect some groups more than others?
3. Will the proposed revisions promote equal opportunities?

5. Equalities Context

National context

The Equality Act 2010 provides cross-cutting legislative framework to protect the rights of individuals and advance equality of opportunity for all. It aims to deliver a simple and accessible framework of discrimination law which protects individuals from unfair treatment and promotes a fair and more equal society.

On 5 April 2011 the new public sector Equality Duty came into force. The Equality Duty replaces the three previous duties on race, disability and gender, bringing them together into a single duty, and extends it to cover age, sexual orientation, religion or belief, pregnancy and maternity, and gender reassignment. The aim of the Duty is for public bodies to consider the needs of all individuals in their day to day work, in developing policy, in delivering services, and in relation to their own employees.

This EIA has been undertaken in line with the Council's legal duties in relation to equality and as such has assessed the potential impact across the nine quality protected characteristics.

The Human Rights Act came into effect in the UK in October 2000. It means that people in the UK can take cases about their human rights as defined in the European convention on Human Rights to a UK court. At least 11 Articles of the European Convention on Human Rights have implications for the provision of public services and functions. This EIA assesses whether the proposed recommendations are in line with duties established by this Act.

Local context

The Lewisham Values which are set out in *Lewisham Council Corporate Plan 2018-22* are:

- We put service to the public first
- We respect all people and all communities
- We invest in employees
- We are open, honest and fair in all we do

These inform the corporate priorities, which are also set out in the same document and demonstrate the Council's commitment to a fair and inclusive society:

1. Open Lewisham – Lewisham is a welcoming place of safety for all, where we celebrate the diversity that strengthens us.
2. Tackling the housing crisis – Everyone has a decent home that is secure and affordable.
3. Giving children and young people the best start in life – Every child has access to an outstanding and inspiring education, and is given the support they need to keep them safe, well, and able to achieve their full potential.
4. Building an inclusive local economy – Everyone can access high-quality job opportunities, with decent pay and security in our thriving and inclusive local economy.
5. Delivering and defending: health, social care and support – Ensuring everyone receives the health, mental health, social care and support services they need.
6. Making Lewisham greener – Everyone enjoys our green spaces, and benefits from a healthy environment as we work to protect and improve our local environment
7. Building safer communities – Every resident feels safe and secure living here as we work together towards a borough free from the fear of crime.

The Comprehensive Equalities Scheme (CES) is Lewisham Council's equality policy. It sets out the Council's commitment to meeting the Equality Duty. The five objectives of the policy are to:

1. Tackle victimisation, discrimination and harassment.
2. Improve access to services
3. Close the gap in outcomes for all residents
4. Increase mutual understanding and respect within and between communities
5. Increase citizen participation and engagement

6. Policy Context

There have been a number of government documents which set out the pathway of 'Personalisation' within adult social care as a way of meeting people's needs so that eligible service users have both greater flexibility about the service they receive and greater control over how they are delivered.

For example: 'Putting People First' (2007); 'Transforming Social Care' [LAC (DH) 2008]; 'Caring for Our Future: reforming care and support' (2012)). These policy and guidance documents have promoted the provision of Direct Payments whereby eligible adults are given an assessed sum as cash to purchase their own service and the local authority's role, rather than being one of a direct provider of services, becomes one more focused on market development and shaping.

The Care Act 2014 (The Act) is the most substantial piece of legislation relating to adult social care to be implemented since 1948. It has taken previous legislation, common law decisions and other good practice guidance and consolidated them. The Care Act places a wide emphasis on prevention, the provision of advice and information, changes to eligibility, funding reform and market shaping and commissioning. This final aspect of the Act also emphasises the use of personal budgets and direct payments; and requires the Council to promote appropriate service supply across the provider market and assure quality and diversity to support the welfare of adults in the community. It also requires the Council to engage with providers and local communities when redesigning services and planning for the future.

7. Equalities Assessment of the proposed changes to Older Adults Day Services

Disability

Impact: Neutral

Data summary for disability

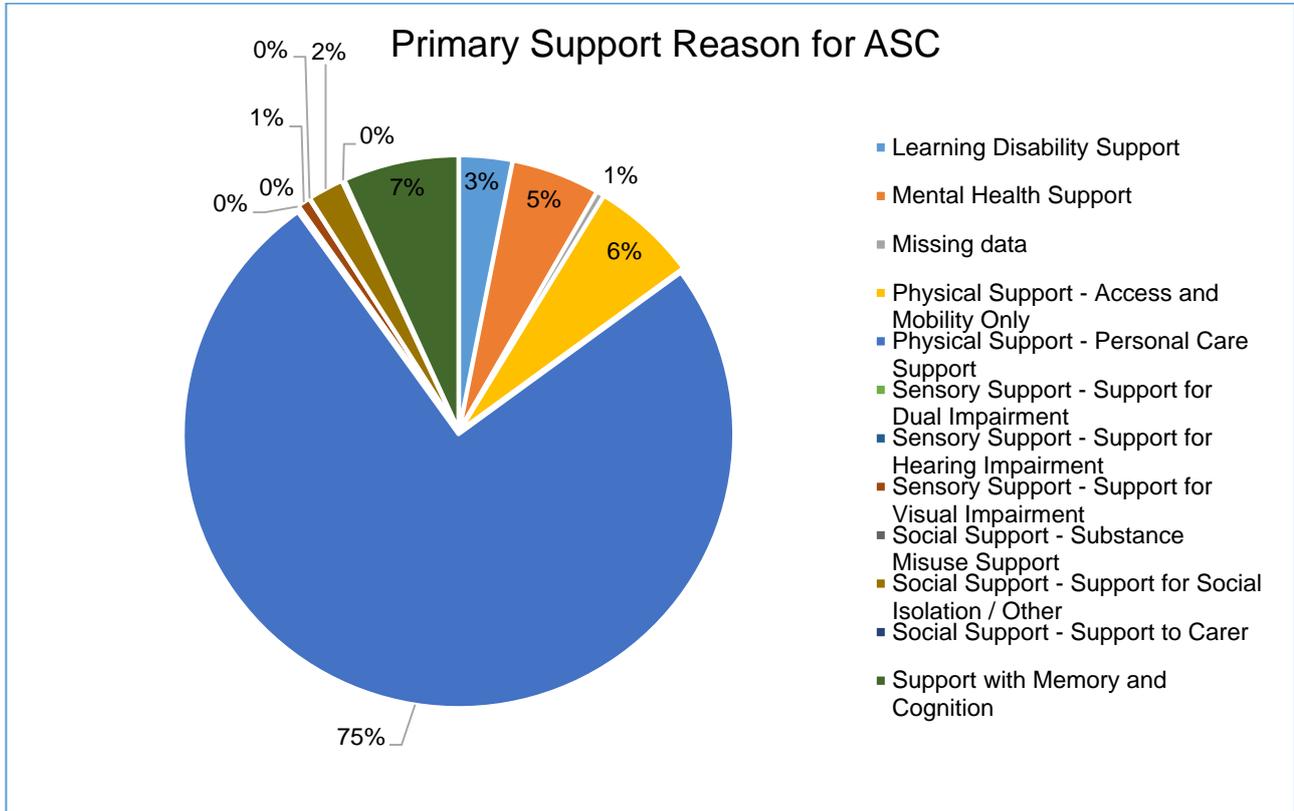
According to the 2011 Census (All Ages):

7.1% (19,523) Lewisham residents indicated that their day-to-day activities were limited a lot, and 7.3% (20,212) indicated that their day-to-day activities were limited a little;

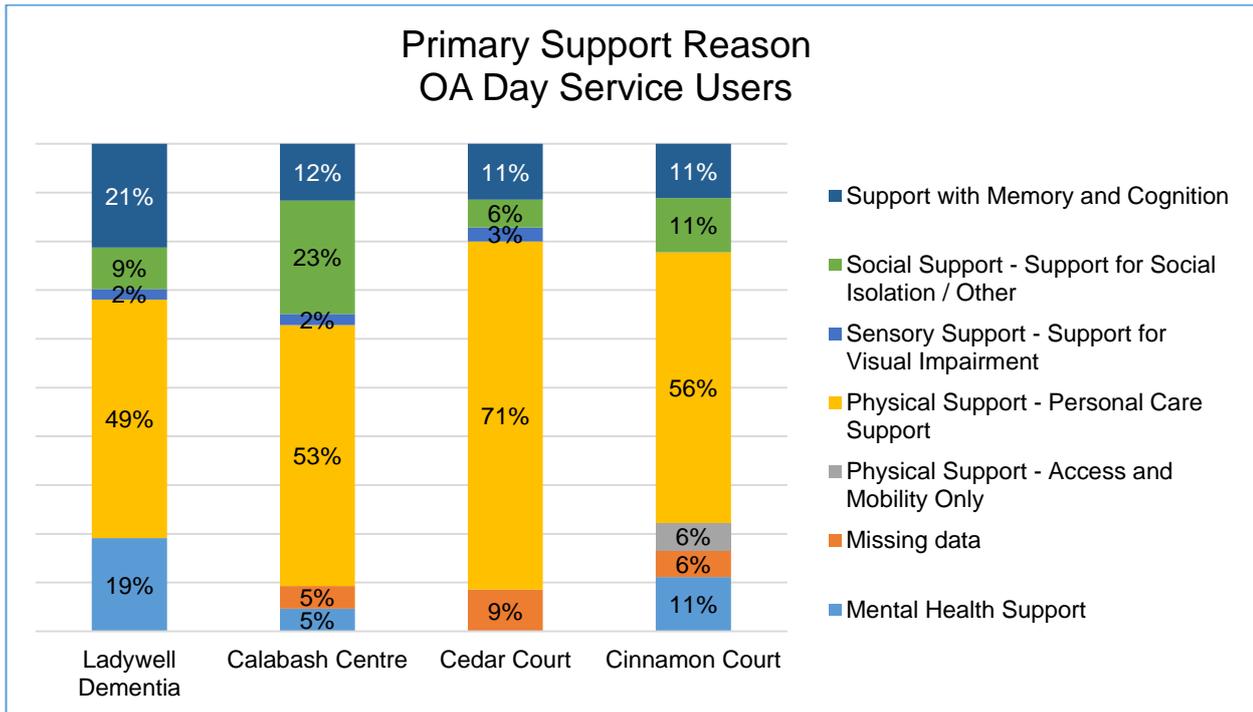
5.3% (14,318) Lewisham residents indicated that they are in bad health or very bad health;

8.1% (22,521) Lewisham residents provide some form of unpaid care. Over 5,000 Lewisham residents provide 50+ hours of unpaid care per week.

Service users affected by the proposals will have some form of disability as they are currently being supported by Adult Social Care. The Care Act 2014 defines a person as being eligible for care and support if they are unable to achieve daily activities which will significantly impact on their well-being. The below chart sets out the Primary Support Reason given on LAS (the Council's client file system) for all people aged over 65 who are in receipt of funded Adult Social Care Services.



Day services specifically meet people’s care and support needs resulting from disability. As a consequence the proposed changes will impact on people with a disability more than people without a disability. The Council does not routinely ask service users whether they consider themselves to have a disability and/or the nature of their disability. The closest proxy is the Primary Support reason listed on Lewisham’s Adult Social Care System, LAS. Older Adult Day Services mostly support people with a primary support need of physical support- personal care support, though other needs relating to support with memory and cognition/ mental health are not insignificant.



The proposed recommendation to combine the three older adults day services at the Calabash Centre, Cinnamon Court, and Cedar Court will primarily affect people with a primary support reason of physical support – personal care support, who are the majority of service users across all services.

The proposal includes a review of the current service specification to ensure that the proposed single service has an additional resource included so that it can meet higher levels of care and support needs which service user reviews are evidencing are increasing across all services: this includes the delivery of intimate personal care and an increase in support required to take medication. The specification would also be shaped to include an increased range of activities to promote physical health and well-being and also memory improvement and reminiscence activities.

While the Calabash building is an accessible building it is also proposed that improvements are made to improve both accessibility and use to some of the areas where access could be improved. In particular the bathrooms will be upgraded and the garden area will be re-surfaced to enable people in wheelchairs, with limited mobility, or at increased risk of falls to use the outdoor space more readily.

This may have a positive impact on service users and the wider population of older adults who may require building based day services in the future to meet these needs. This is in line with the Council's Corporate Equality Scheme commitment to improve access to services and to close the gap in outcomes for all residents.

The inter relationship between the protected characteristic of disability and the protected characteristic of age, and the potential frailty of adults with both was also considered in terms of transport. The proposals would require some people who currently live on-site at Cedar Court or Cedar Court extra care schemes to travel to the new service at the Calabash Centre. There is also a possibility that other service users may need to travel further to the Calabash than they do to their current service.

The Council will apply its Transport and Travel Assistance Policy on a case by case basis to assess whether or not an individual is eligible for travel assistance. However, it is expected that everyone who is currently eligible for travel assistance will remain eligible. There are 15 people currently not travelling to day services because they also live in the Extra Care services at Cedar Court and Cinnamon Court are also likely to be eligible for transport assistance. Seven of the 15 have previously travelled to day services prior to their move to extra care.

Transport to and from the Calabash Centre is currently provided by Voluntary Services Lewisham (VSL) who have modelled the routes for a single service should they be a single transport provider for that service. VSL confirmed that door to door journey times could be provided within a maximum of 1 hour. Average journey times currently for people attending Cedar Court and Cinnamon Court are between 30 and 45 minutes. Concern has been raised regarding the length of journey and the potential impact on frail older people of being on a bus for 2 hours a day. The transport review has highlighted that there is capacity to continue to access Lewisham Passenger Services who currently operate the routes to Cinnamon Court and Cedar Court. Continued access to this services will reduce the journey times for older adults as modelled by VSL to a duration at least as good as the current 30-45 minutes each way trip.

All service users will be assessed to better understand their specific individual needs and how these may be affected by the proposed changes. Should the proposals be agreed these assessments will be used by support planners working in conjunction with service users and their families to identify suitable alternative ways to meet their needs. Care Act eligible needs will continue to be met, and mitigation will be applied in line with this EAA.

Sexual Orientation

Impact: No Impact

Data summary for sexual orientation

There are no accurate statistics available regarding the profile of the lesbian, gay, bisexual and transgender (LGBT) population either in Lewisham, London or Britain as a whole.

The Greater London Authority based its Sexual Orientation Equality Scheme on an estimate that the lesbian and gay population comprises roughly 10% of the total population.

At the 2011 census 2% of over 16 year olds were cohabiting with someone of the same sex or were in a civil partnership, this is higher than both the England and London averages (0.9 % and 1.4% respectively).

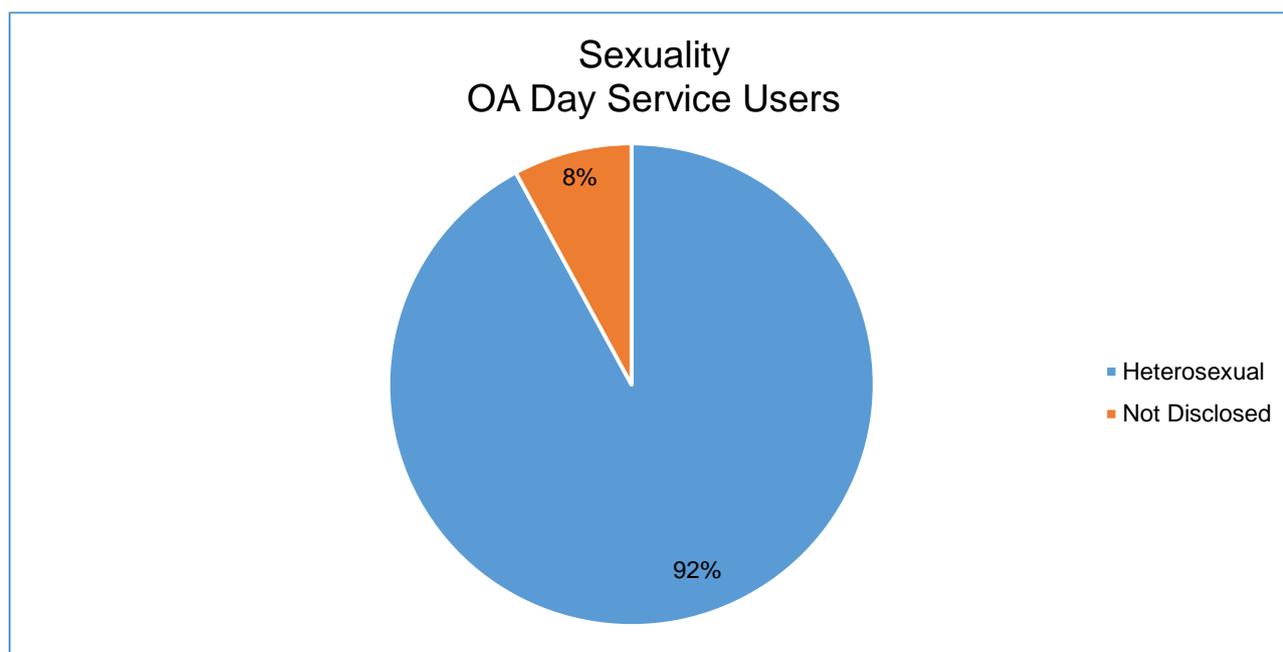
The 2015 Annual Resident Survey, a question on sexual orientation found that 3% of respondents identified as lesbian or gay.

Sexual orientation is not well recorded in social care records, with 76% of records not having orientation noted for adults over 65. This makes it difficult to consider the full implications that the recommended changes would have on this protected characteristic.

There is limited data about Sexual Orientation for service users who attend older adults' day services. Of the 36 service users who have a recorded sexual orientation, 92 (no.=33) are recorded as heterosexual, and 8% (no.=3) Not disclosed.

A change of service may have a negative impact on the protected characteristic of sexual orientation if, for instance, someone feels less able to disclose their sexuality to a new group of staff members or other service users following the proposed change. However, based on the information we have on service users it does not appear that there will be anybody directly affected at this time, as such it has been assessed as having no impact.

The service will be required to provide equalities and diversity training for staff, to have an Equalities Policy in place and to ensure that all service users are treated with respect by staff and other service users regardless of their sexuality.



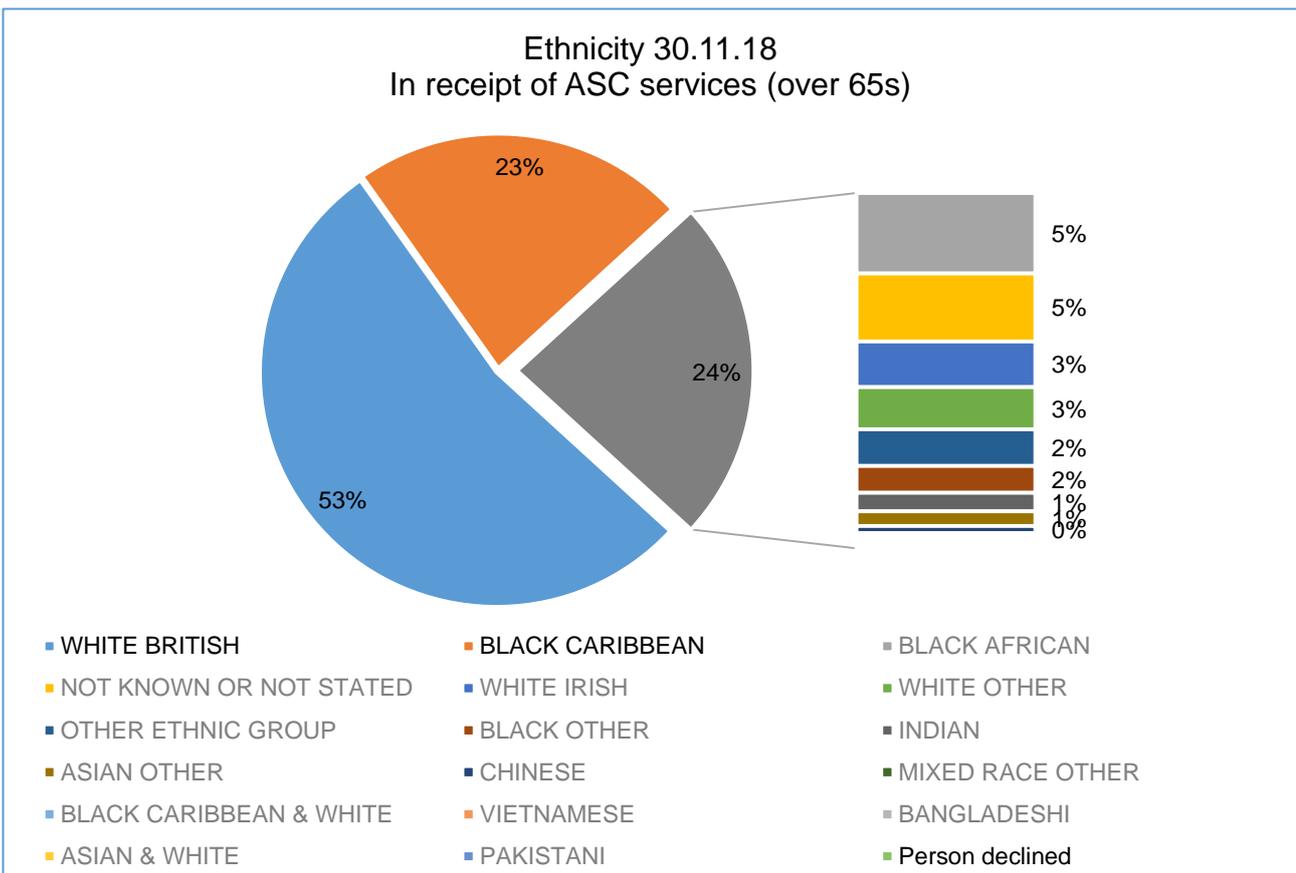
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Data summary for Race

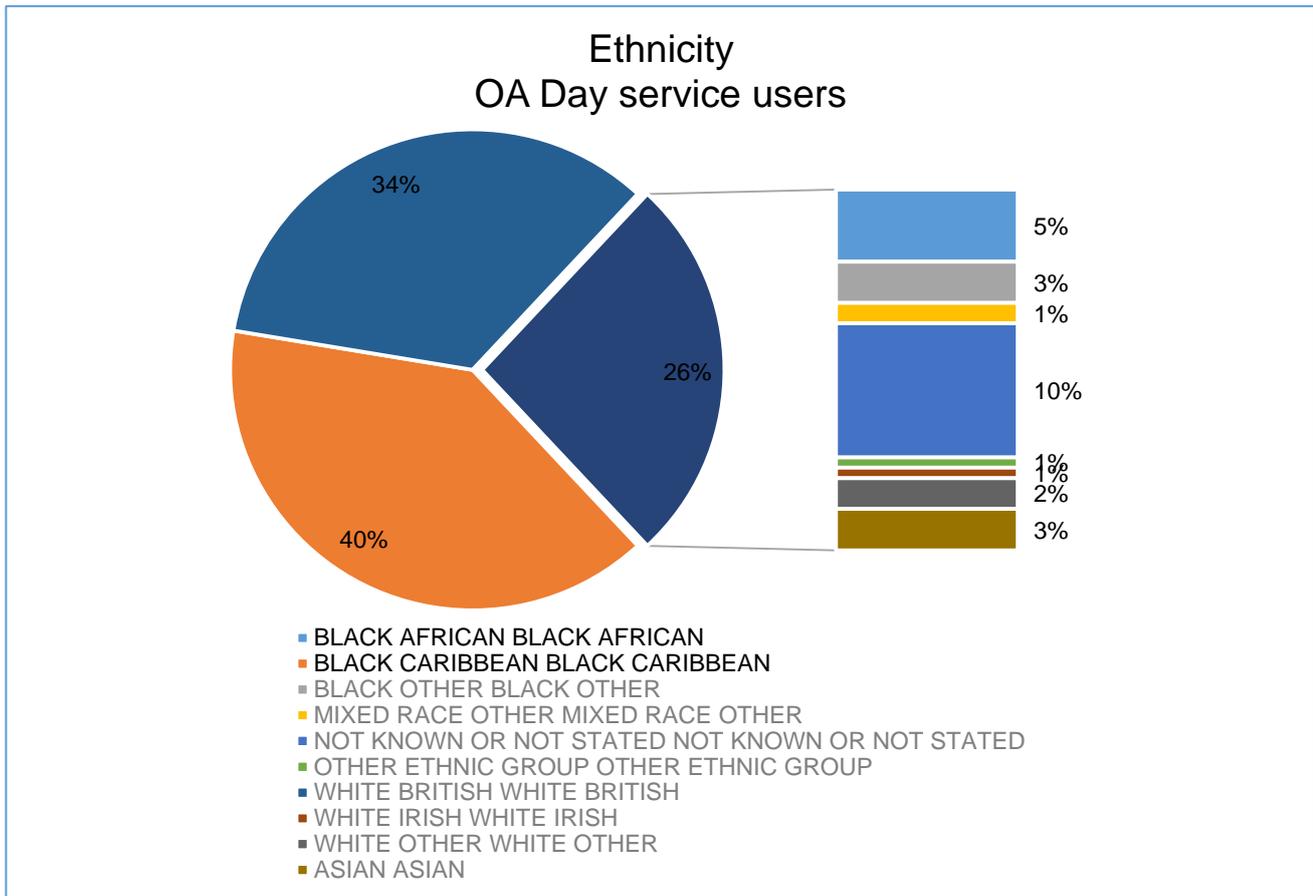
According to Census data from 2011, 53.6% (147, 686) of all Lewisham residents are white (White British, White Irish and White European). Currently people from a Black Caribbean, Black African and Black other ethnic background represent 27.2% (74,942) of the population.

The over 65s population (26,135) is less diverse than Lewisham’s overall population. The proportion of over 65s who are White British is 65% (16,996), those from White Irish, White European and White Other backgrounds is 10% (2,499). The proportion of the over 65s population who are from a Black Caribbean background is 13% (3,528 people), whilst those from Black African and Black other ethnic background is 4% (1,170). There are much smaller numbers of people from other ethnic backgrounds, with the next largest group reported in the Census as being Asian Other at 2% of the over 65s population (490).

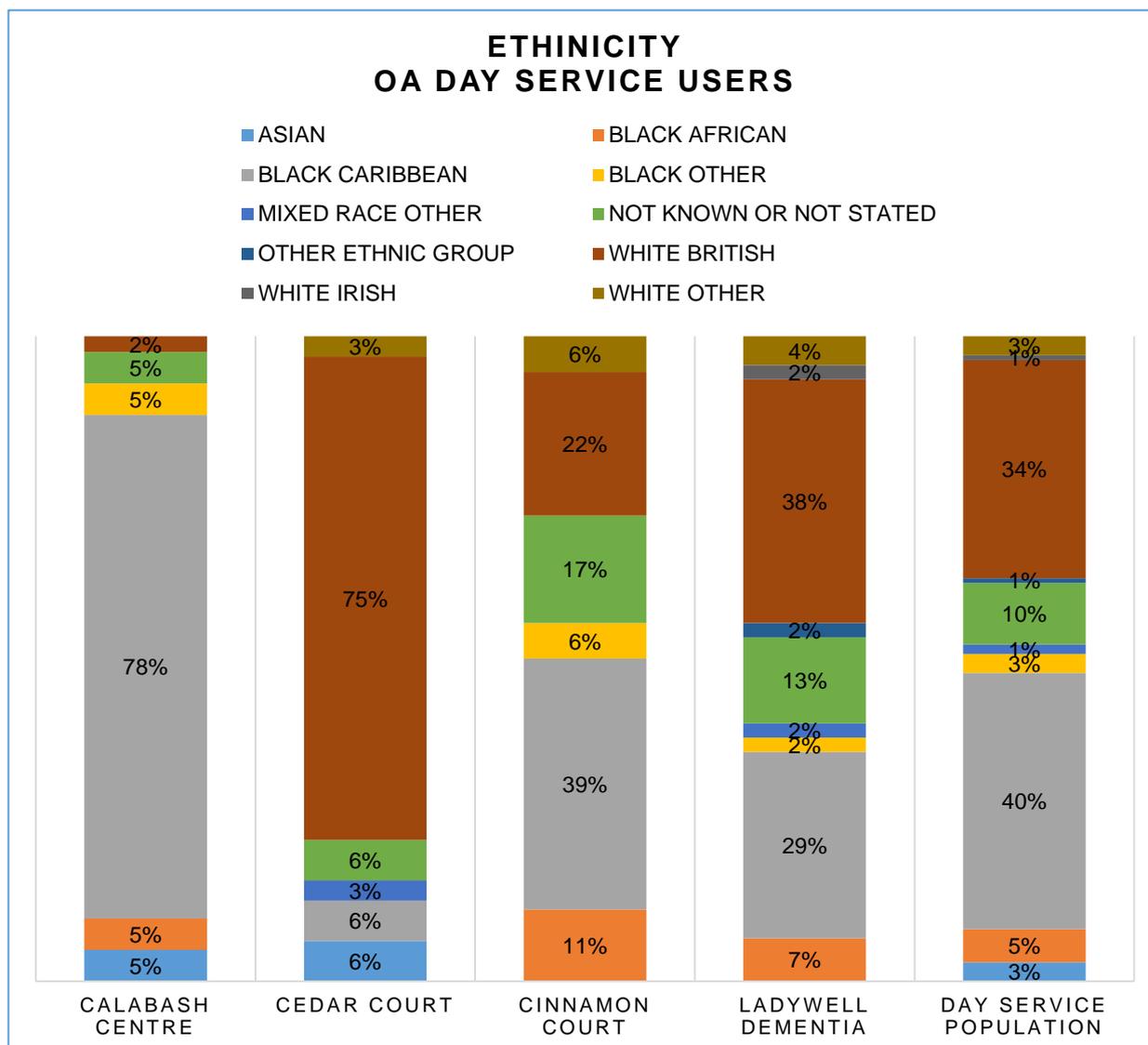
The below chart shows the ethnicity of all over-65s in receipt of ASC Services. This includes those in Residential and Nursing Care which is Council-funded. Relative to Lewisham’s wider over 65s population there are higher proportions of people from Black Caribbean, Black African and Black Other in receipt of Adult Social Care Packages, and lower proportions of White British, White Irish and White Other Populations.



The below chart shows the ethnicity of service users in Older Adult's Day Services. Compared to the general over-65s population in Lewisham and the population of older adults in receipt of services from ASC, there is a higher proportion of people from Black Caribbean, Black African and Black Other ethnic backgrounds in day services. There is a lower proportion of people from White British, White Irish and White Other backgrounds in day services, compared to the proportions of people from these backgrounds who are in receipt of ASC Services.



The ethnic breakdown of service users varies across the different day services. This is shown in the below table.



As expected, the BME-specific day service at the Calabash Centre has the highest proportion of Black Caribbean Service Users with 76% of service users from this ethnic background. This means that 19% (as 5% are not known or not stated) of users of the BAME specific service are from other BAME communities. This evidences that the Calabash Centre is no longer an African Caribbean specific service.

The older adult day services at Cinnamon Court and Cedar Court have a higher proportion of White British service users but also have a relatively high proportion of service users from other ethnic backgrounds, with 23% of attendees at Cedar Court and Cinnamon Court also being from African Caribbean backgrounds and 13% of attendees being from other BAME backgrounds. The higher proportion of white British service users is to be expected as these are not culturally specific day services. However, there is also a relatively high BAME group using those services. The demographic make-up of these day services is broadly aligned to the overall proportions of people from different ethnic groups in receipt of ASC Services.

The proposal to combine all three older adults day services at Cinnamon Court, Cedar Court and Calabash into one single service offer, and therefore to not re-commission a specific separate BAME day service offer, will affect people who currently attend the BAME specific day service at the Calabash. In terms of continuing to meet the specific cultural and dietary needs of this group of

older adults, the service specification will include culturally specific activities. The single service will also allow the continuation of a freshly cooked meals service which will be required to deliver a culturally appropriate meal offer every day. It is important that this aspect of the specification in particular is coproduced with the people and their families directly affected. It also will present an opportunity for wider coproduction with those people and families from BAME communities currently using the Cinnamon and Cedar Court services. Should the proposal be agreed, there is also opportunity for the development of a quality assurance process involving a lay visitor/ expert by experience component. These actions will support the mitigation of any possible negative impact of not having a commissioned BAME specific day service.

The Council recognises that some people from BAME communities accessing these services will have lived experiences of racism. While there is no evidence from the consultation, or wider monitoring of the Cinnamon Court and Cedar Court day services or extra care services, of racism between service users concern has been raised, by some, that the proposals for a single service could exacerbate the stress for BAME individuals and increase the potential for incidences of racism by others. In mitigation, the Council will ensure that there is a zero tolerance approach to discrimination of any kind. Provider policies will explicitly state a zero tolerance approach and set out how and what action it will take should any service user evidence racism, and what and how immediate action will be take in the event of any incidence of racism.

Also raised by some is the legacy of the Calabash Centre and its importance to the wider African Caribbean community as a signal of Lewisham's solidarity with the 'Windrush Generation' and whether not having a specific BAME commissioned day service weakens that legacy. Others have expressed a view that they would welcome the integration of the Calabash with other day services to promote integration and a sustainable future for the day service and the building.

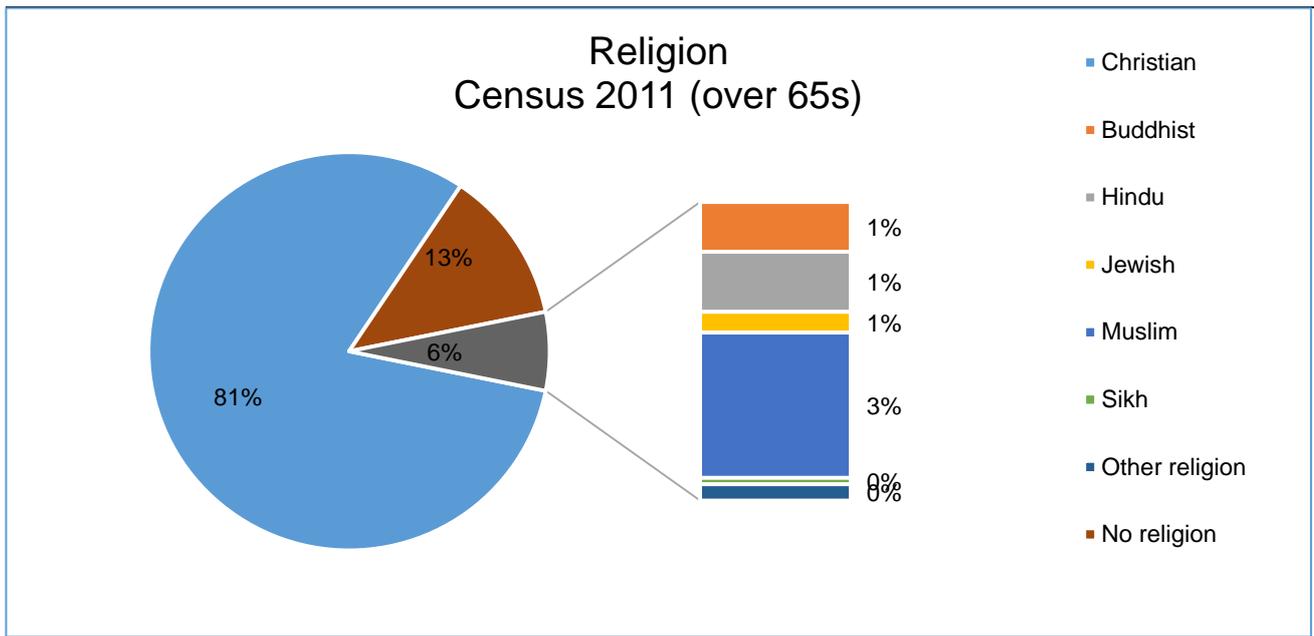
As above, the Calabash day service is no longer an explicitly African Caribbean specific day service. The BAME day service is already used by people from other cultures and a number of different groups from different cultures (for example a learning disability service) also use the building for day services. However, the importance of acknowledging and protecting the cultural heritage of Calabash for the 'Windrush Generation' is recognised. The Council will protect access for the African Caribbean Active Elders group, through a formal partnership agreement between the group and the service provider, and support the group to promote itself with that community. The Council will also actively support use of the building by BAME communities at evenings and weekends and will work with third sector partners to deliver this outcome. These actions will to support the Council's commitment to the identification of the Calabash Centre with the wider African Caribbean community and support the reduction of social isolation in that community in the longer term.

Impact: No Impact

Data summary for religion or belief

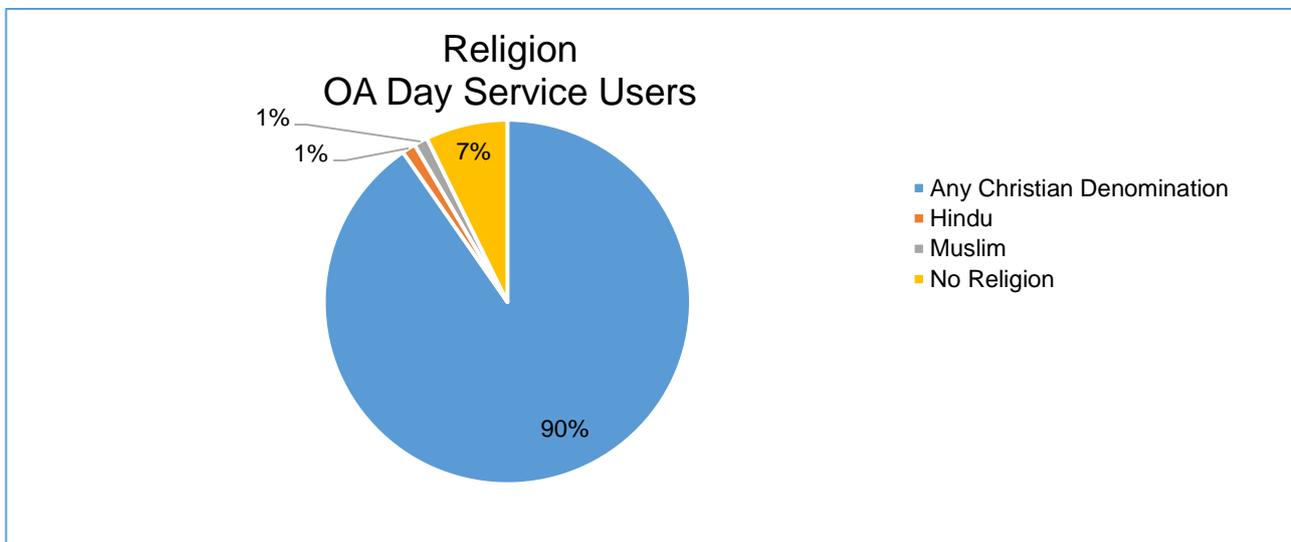
The most up to date information on religion or belief in Lewisham is from the Census of 2011. This revealed that nearly 64% of Lewisham residents described themselves as having a faith or religion, whilst around 27% of residents described themselves as having no faith or religion.

Amongst those residents that described themselves as having a faith or religion some 52.8% identified their faith as Christian, whilst 6.4% described themselves as Muslim. Of other religions, Hindus represent 2.4% of the population, whilst Buddhists represent just over 1.3% of the population.

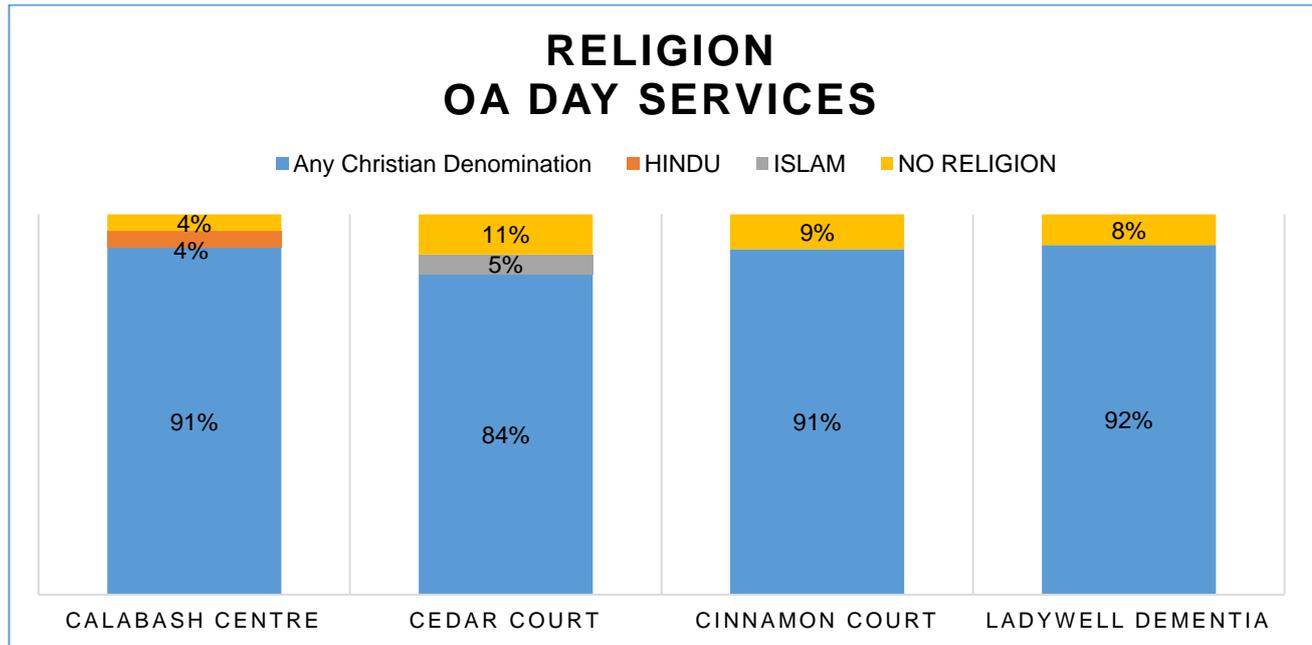


Please note that 10% of respondents had no religion recorded and were therefore excluded.

The majority (81%) of people aged 65 and over in receipt of Adult Social Care Services in Lewisham who have a recorded religion identify as Christian. The next biggest recorded group is those who have No Religion (13%). There are relatively small proportions of people who belong to other religions, 1% of people are Buddhist, 1% are Hindu, 1% are Jewish and 1% are Muslim.



80 out of 136 service users in a day service have a religion. 66/136 are not known and were excluded from the analysis. The majority (88%) are Christian, 1% are Hindu and 1% are Muslim.



The majority of people attending older adult day services with a recorded religion are Christian. The next largest proportion of people recorded have “no religion”. There are a small number of Hindu service users at the Calabash and a small number of Muslim service users at Cinnamon Court. There is variation across the different schemes, but in reality the numbers of service users with a recorded religion are so small that this is not likely to be a significant difference.

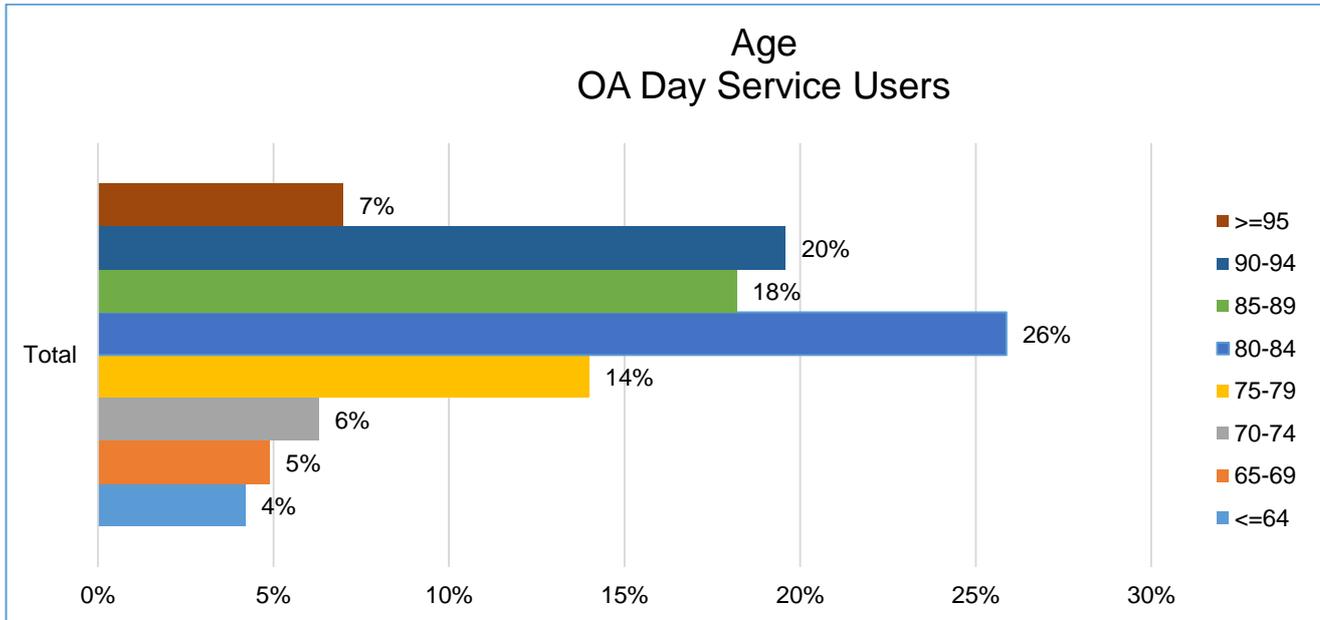
The proposals do not affect the protected characteristic of Religion, as people will continue to be supported in line with their individual assessments and support plans, which will take into consideration any religious requirements. However, it is noted that in multicultural Lewisham the description of ‘Christian’ can reflect many churches and ways of celebrating faith. The service specification will require that there is a formal review twice a year of the celebratory preferences of day service attendees. It will also require a programme of understanding and celebration of culture and religion specific events to be part of the day service curriculum.

Age

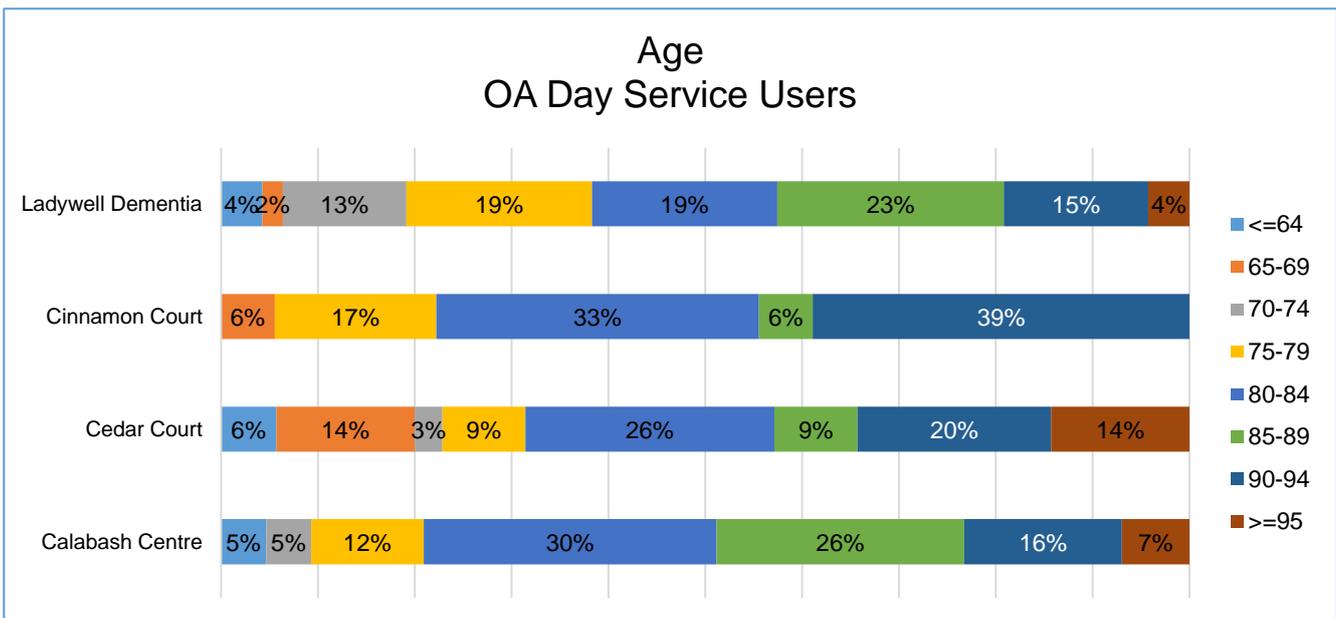
Impact: No Impact

Data summary for age

The 2011 Census identified some 70,100 Lewisham residents are aged between 0-19 (25% of the population), whilst some 179,800 residents are aged between 20-64 (65% of the population). By contrast there are some 26,200 older people aged 65 and over (9.5%).



The Age distribution for Service Users at Older Adult's Day service is shown below. 67% of Service Users are aged 80 and over. 24% are aged 90 and over. Only 40% of service users are aged 79 and under, and only 9% are aged under 69. Due to the nature of the service provided, all proposals are likely to affect older people more than younger people.



There is variation in the age profile across the different services. The Cedar Court day service has both the largest proportion of people aged under 65 (6%) which reflects the outcome of previous

day service changes and the highest proportion of people aged over 95 (14%) attending. The most represented age group across all services is 80-84 year olds, which make up between 19% of the service users at Ladywell and 30% at Calabash.

The proposals do not seek to differentiate the service available based on age and therefore it has not been assessed at having an impact on the protected characteristic of Age. However, while all people affected by these proposals will be supported through a personalised individual assessment process, particular attention will be paid to the needs of those adults under the age of 65 and how they might want to be supported to reflect their age in any new service.

Sex

Impact: Slight Positive

Data summary for sex

According to the 2011 Census there are 135,000 (49%) males living in Lewisham and 140,900 (51%) females; however, by 2030 it is forecast that the number of males would have surpassed that of females (158,500 men to 157,100 women).

The Census found that of the 25,622 over 65s living in Lewisham there are 10,916 (43%) males and 14,706 (57%) females.

Of all adults who are aged 65+ in receipt of Adult Social Care Services, there are more female services users (1365, 66%) than male service users (704,34%).

Females are overrepresented in the cohort of Older Adult Day Service Users, when compared with the wider over 65s population and the whole population of over 65s who are in receipt of care. There are 110 Female services (75%) and 33 Male Service Users (25%). No service users have indicated that they are transgender and/or transitioning between genders.

The proposal to re-commission a single service, rather than three services will mean that there would be an opportunity for men who currently attend services with a high proportion of women to socialise with more men. In addition to the men attending actual day services, there is also a significant number of men who attend the Active Elders groups. There is also an opportunity for the provider of the new service to plan men's and women's groups around specific needs and preferences. The proposals therefore are assessed as having a slight positive impact on Sex.

Gender Distribution



Gender	Calabash Centre	Cedar Court	Cinnamon Court	Ladywell Dementia	Grand Total
FEMALE	68%	76%	83%	78%	75%
MALE	32%	24%	17%	22%	25%
Grand Total	100%	100%	100%	100%	100%

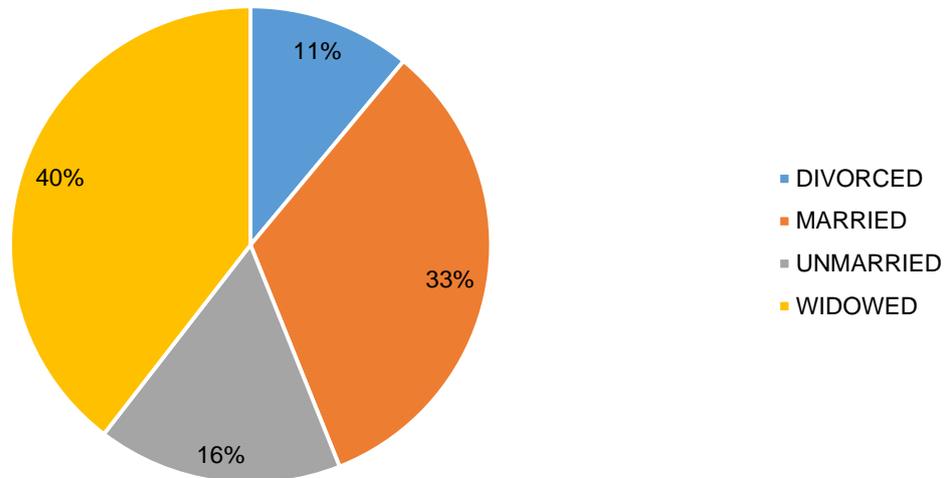
Marriage or Civil Partnership

Impact: No Impact

Data summary for marriage and civil partnership

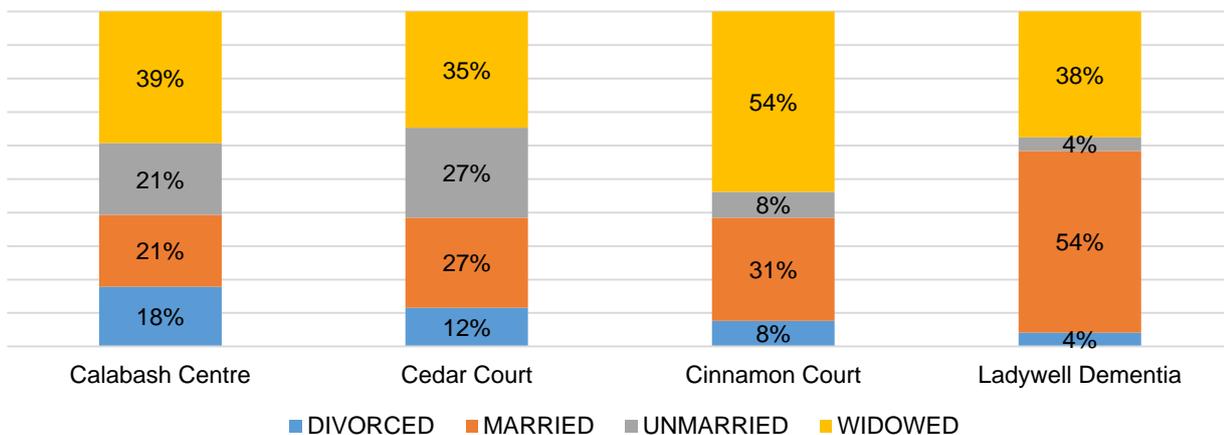
In 2011 about half of Lewisham residents over 16 have never been married or in a civil partnership. This is higher than England as a whole. A third of over 16s in Lewisham are currently married or in a civil partnership (0.5% in civil partnership). 17% of residents (aged 16 and over) have been married or in a civil partnership but are now separated, divorced or widowed.

Marital Status
OA Day Service Users



52 of the 143 service users of older adult day services have no information recorded for Marital Status. They have been excluded from the analysis. Of the service users with recorded information for Marital Status, 40% are widowed, 33% are married, 16% are unmarried and 11% are divorced.

Marital Status
Day Service Users (over 65s)



Of the people known to the Council, there is a higher proportion of married people at Ladywell Dementia, 54%, compared with the proportion of married people at the commissioned schemes subject to this consultation, which is between 21% and 31%. There is a higher proportion of divorced people at Calabash Centre than at other services, 18% compared to between 4% and 12% at other services. There is a higher proportion of widowed people at Cinnamon Court than other services, 54% compared to 35%-54%.

The proposals therefore are not considered to have any impact on the protected characteristic of Marriage.

8. Conclusion

A number of areas relating to equalities have been identified though the consultation and in representations made outside of the consultation period. Overall there is low to no impact on the grounds of disability and age, though concerns relating to travel time for this group, who are also likely to be physically frail, have been considered and mitigations proposed.

There are no issues identified regarding marriage and sexuality and a potential slight positive impact on the grounds of sex for men who are currently attending the day services.

Issues of race are the most significant because of the potential impact of not commissioning a BAME specific service but also because of the resonance of the Calabash building with the 'Windrush generation' and its importance as a sign of the Council's solidarity with the experiences of that population. The EAA has identified a number of measures that can be put in place to mitigate against those concerns. From ensuring the application of a zero tolerance approach to racism to publicising the Active Elders groups more proactively with the general population, to supporting the use of the building at evenings and weekends by other groups and partner organisations.