

# Equality Impact Assessment: Closure of Brockhill

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## 1. Introduction

This Equality Impact Assessment (EIA) seeks to identify impacts and effect of this proposal with the aim of assessing whether it would have a disparate impact on persons with a protected characteristic under the Equality Act 2010. As part of this assessment, consideration will be given to ways in which any such impact can be avoided or mitigated, any negative impacts arising from this proposal will be assessed and where this could be reduced in their impact this will be noted in the attached action plan. The Council also recognises that it may not completely remove all negative impacts.

The purpose is to provide impartial information to assist in the decision-making process and inform rather than determine policy. The objective is not to make the decision but to assist decision makers through the provision of relevant information.

The recommendation is to close Brockhill due to the extent of works required following a fire risk assessment that took place on 18 January 2023 and other substantial capital investments needed at the scheme. The FRA identified that the compartmentalisation of the building along with the fire doors did not meet regulatory standards and posed significant risk to the tenants living at Brockhill. The tenants at Brockhill are elderly and vulnerable, some with complex disabilities and health needs including non-ambulant tenants.

Following on from the FRA inspection, Woking Borough Council took measures to complete the work needed at Brockhill and ensure that the tenants were safe in their homes. This included changing the evacuation policy from a stay put policy to an evacuation policy. A new fire detection panel system was installed, all fire alarms in flats replaced to match the new evacuation system and a waking watch put on site to add additional protection. All new letting of void flats ceased at this time so as not to add an additional risk to the situation.

Costs were obtained for work to address the compartmentalisation and fire doors, along with other capital works (including a full heating system replacement). Due to the significant cost impact and the current financial status of the Council, Woking Borough Council approached commissioning colleagues at Surrey County Council (SCC) to request assistance. Brockhill's care is commissioned by SCC and they have involvement in the nominations process and Extra Care delivery. In November 2023, SCC confirmed that the cost to update Brockhill was significantly more than first anticipated and the building fixes would only 'make good' for between 5 to 10 years at which stage the building would have run it's course and need to be re-built if operating as an Extra Care scheme.

On Wednesday 29 November 2023, staff at Brockhill were informed of the proposed closure and the process planned to undertake this. On Wednesday 6 December 2023, a tenant meeting was held and tenants were informed of the news by the strategic director.

Surrey Fire and Rescue Service and Woking Borough Council had significant concerns regarding evacuating the tenants should a fire break out. A huge effort to find suitable housing for all HIGH rated (as referred to in tenants Personal Emergency Evacuation Plan, PEEP) was undertaken immediately, whilst simultaneously working with the rest of the tenants rated medium and low to source suitable housing arrangements. The local adult social services team are also involved in assessing all tenants to ensure that their housing wishes meet their care needs. An evacuation team was introduced in December 2023 to manage the evacuation risks in the short-term.

At the time of Brockhill closure announcement (6 December 2023), Brockhill had 32 tenants. As of 16 January February 2024 Brockhill has 24 tenants.

## 2. Impact on services:

Brockhill has 48 flats that can be let and at announcement of the proposed closure, 32 were occupied. The closure of Brockhill will affect all the remaining tenants as they are losing their home. This is also having a knock-on effect on their families, who are equally as worried about them.

Demographic information on the current 24 tenants still living at Brockhill is shown below:

Age Range	Quantities	Percentage	Ethnicity	Quantities	Percentage	Gender	Quantities	Percentage
0 to 40		0%	White British	20	83.30%	Female	20	83.33%
40 to 49	2	8.3%	White			Male	4	16.66%
50 to 59	1	4.2%	European	1	4.16%			
60 to 69	3	13%	White					
70 to 79	3	13%	American	1	4.16%			
80 to 89	7	29%	Jamaican	1	4.16%			
90 to 99	8	33%	Chinese	1				
100+	0	0%						

The closure will also affect all the people who attend day care at Brockhill. Day Care ceased to be offered at Brockhill in December 2023 and all the day care clients moved to Hale End Court as an alternative.

The Council is required by law to provide affected residents with suitable alternative accommodation under the Housing Act 1985 if Brockhill closes. Officers are exploring three alternative housing options with the current tenants at Brockhill depending on their preferences and their overall needs. The three options are:

- Sheltered Housing
- Extra Care Housing
- Residential Care Home

Woking Borough Council offer both Sheltered Housing and Extra Care and these properties in our stock are being prioritised for all Brockhill tenants. Residential and nursing homes are sourced by adult social care. Adult Social Care will not move anyone with capacity who does not wish to go to a care home. There are a few tenants at Brockhill who no longer have capacity and are deemed to require the level of care that is provided by a residential home. In these situations, families with Legal Power of Attorney can make the decision or a best interest meeting with the involvement of Adult Social Care and Next of Kin (NOK) will take place.

There are a few tenants living at Brockhill that do not have any care needs and are fully independent, not even engaging with the services on offer such as the dining service, social activities or support. For these tenants, sheltered housing is a suitable option.

The majority of tenants at Brockhill would like to move to the Council's sister scheme, Hale End Court in Old Woking. However, there are currently no vacancies. This can change very quickly and the team have a list of tenants (12 in total) who would like to move there. Officers have formulated the list in order of priority, which is dictated by the level of care that person needs. Although we only have one other Extra Care Scheme, Woking Borough Council has engaged with housing provider, Thameswey, who have just built a brand new apartment block with 68 flats and a lounge and café area in the Sheerwater regeneration area, close to local amenities. This building is intended as sheltered housing for the over 55's or vulnerable adults that may require it. The Council and Thameswey are in principle agreeing to leasing the first floor, 17 flats to Brockhill in order to re-create a mini Brockhill within the new building. Woking Borough Council are in discussions with Surrey County Council about providing care within the building. If this can be achieved, then all housing requests for the current 24 tenants having to leave Brockhill will be met.

As well as the housing solutions provided to help mitigate the situation, the Brockhill team have also been holding weekly tenant meetings with tenants and NOK to update them on all the options, what's happening and what is available to them. Catalyst have been on site three days a week to support tenants with their mental health and wellbeing through this period of change. Citizens Advice Bureau have also attended tenant meetings to advise tenants on their housing options. All tenants are receiving a home loss payment of £8,100 for the inconvenience caused and to assist setting up a new home.

### **3. Engagement and consultation**

Under Section 105 of the Housing Act 1985 the Council has a legal obligation to consult its secure tenants on 'matters of housing management' such as changes to the management, maintenance, improvement or demolition of houses let by them, or changes in the provision of amenities.

A consultation with tenants ran from 20 December 2023 to 22 January 2024. Tenants were assisted by Brockhill staff to complete the consultation survey, along with advocacy support commissioned from Citizens Advice Woking (CAW). The survey sought views on the proposed closure and its impact on tenants, along with seeking input on the type of accommodation and support tenants would need with moving to a new home. The Council received a total of 19 responses to the survey, representing 76% of the remaining tenants living at Brockhill.

Respondents were asked to provide comments on the proposed closure of Brockhill. Generally, tenants expressed their shock and upset at the news of the proposed closure. Some expressed their frustration that the building had not been maintained better over the years. However, some residents felt the proposed closure had opened up alternatives for them, such as, moving closer to relatives.

74% of respondents felt the proposed closure would impact them negatively. All respondents identified some downsides with a potential move, particularly the disruption, not wanting to move away from Goldsworth Park and being separated from friends at Brockhill. However, 42% of respondents identified potential benefits to the proposed closure, particularly moving closer to family and wanting more modern facilities. Two residents felt they needed more care than Brockhill could offer them.

The majority of respondents would like to move to other extra care housing schemes in the Borough (i.e. Hale End Court). However, respondents were aware of the lack of available spaces. There was also interest in moving to residential care homes, extra care housing schemes in other areas and sheltered housing from some respondents. All respondents indicated that they would need support to move, with packing and unpacking; removals and post redirection being the mostly frequently selected support needs.

		Positive impact?			Negative impact?	No specific impact	<p><b>What will the impact be? If the impact is negative, how can it be mitigated? (action)</b></p> <p>This section needs to be completed as evidence of what the positive impact is or what actions are being taken to mitigate any negative impacts</p>
		Eliminate discrimination	Advance equality	Good relations			
<b>Gender</b>	Men				x		<p>17% of remaining tenants living at Brockhill are male and will need to move due to the closure.</p> <p>Mitigation: In order to help mitigate this negative impact, the Council is working closely with all tenants to understand what housing solutions they would like and sourcing these. All sheltered and extra care vacancies are being prioritised for Brockhill Tenants and the team are organising viewings of properties when they become available.</p> <p>The tenants are also being supported through Catalyst for their mental health and wellbeing and Citizens Advice Woking for housing related options. Tenants will also receive a home loss payment of £8,100 as compensation for the disruption and assistance to set up a new home.</p>
	Women				x		<p>83% of remaining tenants living at Brockhill are female and will need to move due to the closure.</p> <p>Mitigation: In order to help mitigate this negative impact, the Council is working closely with all tenants to understand what housing solutions they would like and sourcing these. All sheltered and extra care vacancies are being prioritised for Brockhill tenants and the team are organising viewings of properties when they become available.</p> <p>The tenants are also being supported through Catalyst for their mental health and wellbeing and Citizens Advice Woking for housing related options. Tenants will also receive a home loss payment of £8,100 as compensation for the disruption and assistance to set up a new home.</p>

<b>Gender Reassignment</b>						x	There is no specific impact on this group.
<b>Race</b>	White				x		Relocation of homes may give rise to a negative impact on all groups as noted above. The majority of tenants, 83%, are of White British background.
	Mixed/Multiple ethnic groups					x	There is no specific impact on this group.
	Asian/Asian British					x	There is no specific impact on this group.
	Black/African/Caribbean/Black British				x		<p>Relocation of homes may give rise to a negative impact on all groups as noted above. There is one tenant (4%) living at Brockhill who will be impacted.</p> <p>Current accommodation may be based or nearby the person's community – if the new accommodation is not in the same vicinity this may impact their general well being.</p> <p>Mitigation:  Assessment with carers/families/advocates to ensure that their needs and wishes and what is important to them are understood to enable suitable alternative provision to be identified.  Full assessments with carers/families/advocates to ensure location and facilities of any new home fully meet individual needs.  Individual communication will be assessed and taken into account.</p>
	Gypsies / travellers					x	There is no specific impact on this group.

	Other ethnic group				x		<p>Relocation of homes may give rise to a negative impact on all groups as noted above. There are 2 tenants (8%) living at Brockhill who will be impacted.</p> <p>Current accommodation may be based or nearby the person's community – if the new accommodation is not in the same vicinity this may impact their general well being.</p> <p>Mitigation:  Assessment with carers/families/advocates to ensure that their needs and wishes and what is important to them are understood to enable suitable alternative provision to be identified.  Full assessments with carers/families/advocates to ensure location and facilities of any new home fully meet individual needs.  Individual communication needs will be assessed and taken into account.</p>
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<b>Disability</b>	Physical				x	<p>There is a potential for increased impact to users with physical disabilities (dependent upon the nature of the disability) whereby a greater reliance is placed upon the ability to access certain types of housing in order to offer a level of independence or meet a care need.</p> <p>The closure of Brockhill and lack of Extra Care availability, a like for like housing option, could therefore adversely impact these groups and detract from the ability to achieve independent living.</p> <p>All tenants at Brockhill have some level of disability or health problem which limits the majority of tenants in some aspect. This may be physically moving around, cognitively remembering things, sensory issues meaning they rely on others assistance or lifelong debilitating illnesses.</p> <p>Mitigations: Individual discussion will be held with tenants who identify as having a disability to work with them to seek a solution. This will include looking at a range of housing options and involving the expertise of occupational therapists and adult social care.</p> <p>Potential to improve outcomes for people through an alternative service. Some disability related needs may be better met in a different environment. For some tenants their new accommodation may be closer to family. For some tenants their new accommodation may be closer to facilities they use.</p> <p>Following on from any moves tenants will be visited and kept in regular contact with to monitor how they are. Individuals with disabilities and their families may experience uncertainty and anxiety with potential changes to the current service they receive. People with some disabilities may struggle to adjust to their new environment.</p>
	Sensory				x	As above

	Learning Difficulties				x		As above
	Mental Health				x		As above

<b>Sexual Orientation</b>	Lesbian, gay men, bisexual					x	There is no specific impact on this group.
<b>Age</b>	Older people (50+)				x		<p>92% of tenants at Brockhill are aged 50+.</p> <p>Mitigation:</p> <p>The closure will impact on this age group and will be mitigated as outlined above.</p> <p>Tenants may be anxious about moving, to help support them with this weekly tenant meetings have been put in place to update on all information. In addition Catalyst are onsite weekly to provide 1:1 support.</p> <p>Tenants may be reducing their support network and friendship groups as they might not be able to access the same cleaner, shopping service etc and they might not be moving to the same destination as their friends. To help mitigate this alternative support has been identified in the form of other cleaners, shopping services, enabling online shopping with technology. Tenants are being supported by people that they know and the staff are heavily involved in the process. In addition to this a party has been arranged for current and past tenants to reflect on good memories and ensure these are not lost. Tenants have been offered to attend Hale End Court day care to ensure that they have things to do whilst the scheme closes, additional support and also to familiarise themselves with Hale End as they can attend day care always irrelevant of their new accommodation.</p>
	Younger people (16 - 25)					x	There are no tenants within this age range so there is no impact to this group.



<b>Religion or Belief</b>	Faith Groups					x	<p>Some tenants will be further away from their faith group (as in the place of worship they attend) and some will be closer.</p> <p>Mitigation:</p> <p>If tenants move to another Extra Care facility or Residential spiritual needs can be met and will be facilitated by onsite staff.</p> <p>Tenants that might be moving to sheltered schemes can be supported by the ILO team to ascertain nearest or preferred places of worship and how to access them.</p> <p>As part of our preferences work with tenants we will ascertain their faith preferences and enable a suitable alternative provision to be identified.</p>
<b>Pregnancy &amp; maternity</b>						x	There is no specific impact on this group.
<b>Marriage &amp; Civil Partnership</b>						x	We have one married couple living at Brockhill and they are impacted in the same way as all other tenants.
<b>Socio-economic Background</b>					x		The closure of Brockhill will give rise to a negative impact on all groups as noted above. Tenants will be offered similar affordable housing.
<b>Carers</b>					x		<p>The closure of Brockhill will indirectly impact carers via the persons for whom they are caring. Some tenants who are working with the onsite provider Care Outlook might not be able to retain this provider if they don't move to Hale End which would mean starting with a new provider and building relationships.</p> <p>Mitigation:</p> <p>We are communicating with onsite providers and external throughout the process. Where an agreed accommodation has been sought for a tenant who has a POC ASC are involved in ensuring a smooth transition with the care provider.</p>
<b>Other identified groups</b>	(Please specify)					x	None identified.

*Despite the potential for negative impact there are sufficient assessments by experts and plans to minimise the negative impact. There are mitigating actions to monitor any remaining negative impacts. Overall the closure of Brockhill which at first appears to be very disruptive to tenants, does however provide the tenants with an opportunity to access updated facilities and receive compensation for the loss of their original accommodation.*

## **ACTION PLAN:**

<b>Actions identified from EIA</b>	<b>Target completion date</b>	<b>Responsible Officer</b>	<b>Comments</b>
All tenants have their own PEEP to indicate as part of their evacuation plan what is needed.	6 December 2023	Independent Living Manager	Completed.
A team of evacuation experts are onsite 24/7 to assist with evacuating any tenants until the closure.	22 December 2023	Head of Housing Assets	Implemented 22/12/23.
ASC are onsite weekly completing care assessments for each tenant to ensure all needs are met.	Ongoing	Adult Social Care	
Where required, mental capacity assessments are taking place.	Ongoing	Adult Social Care	
Weekly tenant meetings to update all tenants and NOK.	Ongoing	Independent Living Manager	
Weekly newsletter includes minutes from tenant information and any other relevant information.	Ongoing	Brockhill team	
Advertising properties through newsletter.	Ongoing	Independent Living Manager	
Arrange a tenant trip to New Woodlands.	29 January 2024	Independent Living Manager	
All sheltered and extra care vacancies to be prioritised for Brockhill tenants	From 1 December 2023	Allocations Team Leader	
Commission support through Catalyst for their mental health and wellbeing and Citizens Advice Woking for housing related options.	December 2023	Head of Living Well	In place.
Provide a home loss payment of £8,100 as compensation for the disruption and assistance to set up a new home.	Ongoing	Independent Living Manager	
Ensure there is a package of support	Ongoing	Head of Living Well	

provided to tenants with moving (i.e. packing, removals, etc.) and following the move to settle in.			
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**SIGN OFF:**

<b>LEGAL SERVICES: Kuldip Channa</b>	<b>DATE: 8/02/24</b>
<b>STRATEGIC DIRECTOR: Louise Strongitharm</b>	<b>DATE: 15/02/24</b>