



Commissioner for Older People
for Northern Ireland

Orla Barron
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1st Floor, Administration Building
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Saintfield Road, Belfast

15/01/24

Re: Draft Equality Impact Assessment on Belfast Trust Implementation Plan to close Muckamore Abbey Hospital

Dear Sir/Madam,

I write on behalf of the Commissioner for Older People for Northern Ireland (COPNI) regarding the Belfast Trust's draft Equality Impact Assessment on the implementation plan to close Muckamore Abbey Hospital in June this year. The Commissioner's office welcomes the opportunity to engage with this consultation, supporting the transition from an inadequate and outdated service model that has segregated individuals with learning disabilities to one that is committed to their integration and participation in our communities.

Through its detailing of the current and proposed future service models, the Equality Impact Assessment is indicative of the Trust's commitment to redeveloping learning disability services and furthering the process of resettlement. COPNI recognises and supports the Human Rights-led approach, which is particularly important given the allegations of abuse of patients by staff at Muckamore Abbey Hospital and the large, ongoing police investigation. The rights of residents were not protected nor promoted, with little respect for their dignity and home life. The extent to which residents could enjoy their home was compromised and we are pleased that the number of residents in Muckamore Abbey Hospital has been successfully reduced from 300 in 2007, to 46 in 2021, to 26 in 2023. More importantly, it is comforting to learn that service users who were a part of the resettlement programme were described as '*happier, brighter, and engaged in less self-harm or behaviours that challenge*' after the move into their new homes.

COPNI is pleased that the proposed future service model is guided by general principles that are anticipatory, rather than reactive, when it comes to services and support, while also promoting shared decision-making between patient, their family and carers, and the Trust. Particularly, the first general principle that 'services are person-centred' can help ensure the involvement of people with learning disabilities, encouraging them to feel a part of the system,



empowered and allowing for increased autonomy while they exercise choice and control over their housing and care needs.

Although age and older people with learning disabilities are mentioned sparingly throughout the Equality Impact Assessment, we note that those aged 65 and above account for 6% of residents at Muckamore Abbey Hospital (figure 15). Similarly, 2021 Census results showed that 0.8% of people aged 65 and above live with a learning disability in Northern Ireland. Although both statistics present these individuals as small cohorts of our society, the fact our population is ageing means the number of older people living with learning disabilities will increase. For example, the National Institute for Health and Care Excellence (2018) state that *'the population of older people with learning disabilities will increase 4 times faster than the overall adult learning disability population'*. Planning and implementation of care for older people with learning disabilities is, therefore, essential now and for the future.

Whilst older people are one of the smallest age groups represented at Muckamore Abbey Hospital, we agree that the closure of the hospital will affect them considerably and *'the impact may be disproportionately significant for those older patients, who have spent most of their adult lives in MAH'*. COPNI is, therefore, reassured that accommodation options are based on individual needs, and that Muckamore Abbey Hospital staff will continue to visit the patients until they are settled in their new home, given this will be a daunting exercise and a radical change to their normality. The National Institute for Health and Care Excellence (2018) rightly highlights that homes designed for adults with learning disabilities may become unsuitable as the service user ages. We understand care managers or social workers will conduct a care review at least annually and trust this will encourage any alterations to be made and ensure the accommodation option is continuing to meet the changing needs of the older person.

Older people with learning disabilities require the same level of support and services as other older people and it may often be the case that those providing learning disability care and support are not adequately trained in mainstream older people's care, and vice versa. It may be helpful for the Trust to establish or strengthen links between learning disability services and mainstream older people's services to ensure the highest quality of care and guarantee the early identification of gaps in care and support (The National Institute for Health and Care Excellence, 2018).

COPNI is supportive of the closure of Muckamore Abbey Hospital and the resettlement of its residents to their own homes. We argue this has the potential to increase levels of independence, dignity, participation, and self-fulfilment among these individuals and ultimately increases their quality of life. Belfast Trust's draft Equality Impact Assessment presents a



future service model that, if executed as described, will balance care and support with individual choice, control and participation in communities.

I would welcome the opportunity to discuss this issue further should it be necessary or helpful.

Best wishes,

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