

BWRDD GOFAL CYMDEITHASOL, IECHYD A LLES Y CABINET

DYDD IAU, 9 RHAGFYR 2021

***YN SYTH AR ÔL CYFARFOD PWYLLGOR CRAFFU POLISIÄU AC
ADNODDAU'R CABINET***

O BELL TRWY TEAMS

**RHAID GOSOD POB FFÔN SYMUDOL AR Y MODD DISTAW AR
GYFER PARHAD Y CYFARFOD**

1. Penodi Cadeirydd
2. Croeso a galw'r rhestr
3. Cyhoeddiadau'r Cadeirydd
4. Datganiadau o fuddiannau
5. Cofnodion y Cyfarfod Blaenorol (*Tudalennau 3 - 6*)
6. Llythyr Terfynol a Chynllun Gweithredu ar y Cyd yn dilyn Cyd-
arolygiad o'r Trefniadau Amddiffyn Plant (CATAP) ar draws Castell-
nedd a Phort Talbot (*Tudalennau 7 - 50*)
7. Adroddiad Perfformiad Chwarter 2 - Plant a Phobl Ifanc a'r
Gwasanaethau i Oedolion (mis Ebrill 2021 - mis Medi 2021)
(*Tudalennau 51 - 96*)
8. Polisi Gosodiadau Tai a Rennir 2021 - Canlyniad Ymarfer
Ymgynghori (*Tudalennau 97 - 198*)

9. Datblygu Canolfan Byw'n Annibynnol yn B'spoked (*Tudalennau 199 - 240*)
10. Ymarfer Caffael ar gyfer Darparu Gwasanaeth Seibiant Byr i Blant a Phobl Ifanc Anabl (*Tudalennau 241 - 276*)
11. Comisiynu Gwasanaethau Gofal a Chymorth mewn Cynllun Craidd a Chlwstwr (*Tudalennau 277 - 310*)
12. Rhoi Fframwaith Sicrhau Ansawdd ar waith ar gyfer Darparu Gwasanaethau Byw â Chymorth Anableddau Dysgu ac Iechyd Meddwl yng Nghastell-nedd Port Talbot (*Tudalennau 311 - 388*)
13. Blaenraglen Waith 2021/2022 (*Tudalennau 389 - 392*)
14. Eitemau brys
Unrhyw eitemau brys (boed yn gyhoeddus neu wedi'u heithrio) yn ôl disgrisiwn y Cadeirydd yn unol ag Offeryn Statudol 2001 Rhif 2290 (fel y'i diwygiwyd).

K.Jones
Prif Weithredwr

Canolfan Ddinesig
Port Talbot

3/12/2021

Aelodau'r Bwrdd Gofal Cymdeithasol, Iechyd a Lles y Cabinet:

Y Cynghorwyr A.R.Lockyer a/ac P.D.Richards

EXECUTIVE DECISION RECORD

21 OCTOBER 2021

SOCIAL CARE, HEALTH AND WELLBEING CABINET BOARD

Cabinet Members:

Councillors: A.R.Lockyer and P.D.Richards (Chairperson)

Officers in Attendance:

A.Jarrett, A.Thomas, J.Hodges, C.Plowman and T.Davies

1. **APPOINTMENT OF CHAIRPERSON**

Agreed that Councillor P.D.Richards be appointed Chairperson for the meeting.

2. **MINUTES OF PREVIOUS MEETING**

That the minutes of the previous meeting held on the 16 September 2021, be approved.

3. **FORWARD WORK PROGRAMME 2021/2022**

That the forward work programme for 2021/2022 be noted.

4. **CARERS PARTNERSHIP BOARD ANNUAL REPORT 2020 21**

Decision:

That the report be deferred for consideration to a future meeting of the Social Care, Health and Wellbeing Cabinet Board.

5. **SOCIAL SERVICES COMPLAINTS AND REPRESENTATIONS ANNUAL REPORT 2020 / 2021**

Decision:

That the report be noted.

6. **QUARTER 1 PERFORMANCE MONITORING REPORT 2021**

Decision:

That the monitoring report be noted.

7. **FEE UPLIFTS TO SUPPORT THE SUSTAINABILITY OF DOMICILIARY CARE AND SUPPORTED LIVING SERVICES**

Decisions:

1. Having given due regard to the Integrated Impact Assessment, it be agreed that the Director of Social Services, Health and Housing be granted delegated authority to implement a 10% uplift to the current contract price for Domiciliary Care and Supported living services commissioned by Neath Port Talbot County Borough Council for the 2022/2023 financial year;
2. That this uplift be brought forward to commence 1 October 2021.

Reason for Decisions:

To help re-stabilise the social care market.

Implementation of Decisions:

The decisions will be implemented after the three day call in period.

Consultation:

There was no requirement for external consultation on this item. However, significant work had been undertaken with the relevant providers of social care services in the development of the proposal.

8. **FUTURE OF TREM Y GLYN RESIDENTIAL CARE HOME**

Decisions:

1. That having given due regard to the Integrated Impact Assessment, Option 3 be agreed, as follows: To enter into a new contract with Pobl to retain Trem Y Glyn for a period up to 31 March 2023, with an option for a contract extension up to 31 March 2025, which will be considered in September 2022 pending a better understanding of how COVID-19 will impact on future social care services and demand.
2. That authority be delegated to the Director of Social Care, Health and Housing to implement the agreed option, and the funding arrangement.

Reason for Decision:

To agree the long term future of the Trem Y Glyn facility in Glynneath in light of recent discussions with Pobl.

Implementation of Decision:

The decision will be implemented after the three day call in period.

Consultation:

This item has been subject to external consultation.

9. **ACCESS TO MEETINGS**

RESOLVED: that pursuant to Section 100A (4) and (5) of the Local Government Act 1972, the public be excluded for the following items of business which involved the likely disclosure of exempt information as defined in Paragraph 14 of Part 4 of Schedule 12A to the above Act.

10. **HOUSING RENEWAL AND ADAPTATION SERVICE - REPAYMENT OF DISABLED FACILITY GRANT MONIES**

Decision:

That having given due regard to the Integrated Impact Assessment, the full amount of grant monies as detailed in the private, circulated report be waived, for the reasons detailed in the report.

Reason for Decision:

To ensure the Authority exercises its discretion under the Housing Grants Construction and Regeneration Act 1996: Disabled Facilities Grant (Conditions relating to approval or payment of Grant) General Consent 2008.

Implementation of Decision:

The decision will be implemented after the three day call in period.

CHAIRPERSON



Cyngor Castell-nedd Port Talbot
Neath Port Talbot Council

NEATH PORT TALBOT COUNTY BOROUGH COUNCIL SOCIAL CARE, HEALTH AND WELLBEING CABINET BOARD

9th December 2021

**JOINT Report of the Director of Social Services, Health and
Housing - Andrew Jarrett
and
the Director of Education, Leisure and Lifelong Learning –
Andrew Thomas**

Matter for Monitoring & Information

Wards Affected All Wards

FINAL LETTER AND JOINT ACTION PLAN FOLLOWING THE JOINT INSPECTION OF CHILD PROTECTION ARRANGEMENTS (JICPA) ACROSS NEATH & PORT TALBOT (NPT)

Purpose of the Report

This report serves to share the findings of the JICPA across NPT, including the partnership, undertaken between 28th June and 2nd July 2021. Also attached is a Joint Action Plan (Appendix 2) developed by the partnership (Social Services, Education, Police, Health Probation and Youth Justice) on receipt of the aforementioned JICPA Final letter (Appendix 1).

Executive Summary

The JICPA found:

'The local authority and partners (the partnership) have exercised functions under the Social Services and Well-being (Wales) Act 2014 (the Act) and strive to ensure these make a positive contribution to the well-being and safety of children who need care and support. Their

work was supported by a positive approach to regional safeguarding arrangements with strategic managers proactive in progressing key areas.

We found suitable structures and relationships in place to facilitate effective partnership working where a child was at risk of exploitation. Statutory functions in relation to promoting safety and well-being were being fulfilled. Partners, both statutory and third sector providers such as St. Giles and Barnardo's, were working to a shared ethos of safeguarding children and young people at different levels of vulnerability. This was evident as leaders within these organisations clearly articulate a shared vision. Managers have worked purposefully across the partnership to support identification of and to tackle exploitation. We found a culture of relationship building with people at the heart of practice across organisations.

There is growing understanding across the partnership of criminal exploitation and the complex inter-relationships between this and other forms of exploitation; as well as a contextual safeguarding response bringing a relatively new dimension to the management of extra-familial harm. There is a need, however, to embed expertise about exploitation and the contextual safeguarding concept in to practice and ensure there is full understanding across professional groups.

There was evidence of effective partnership working where a child was at risk of Child Sexual Exploitation (CSE); systems were well developed to support practitioners across organisations, share information and manage risk to maximise the safety of children. Whilst multi-agency exploitation meetings provide a good forum for sharing information, these meetings need to be used more consistently to shape and adapt children's safety plans and improve the co-production of these with young people. Whilst improvement is required, work reviewed reflected the commitment, persistence and flexibility of the approaches used by staff to encourage young people's engagement.

Children's services leaders have a line of sight of front-line practice with plans leading to innovative and evolving service delivery in many

areas. Staff told us about very supportive leadership which was highly regarded. There was a culture of improvement and mutual support driven by leaders across the organisation. This has been maintained during the pandemic. Staff were forward thinking and look to research and best practice to inform their work. The local authority has not adopted a specific risk model. Staff spoken with were not aware of underpinning documents that would help provide consistency and a shared framework for understanding of risk.

The local authority has a positive approach to the management of risk where the views of children, young people and families are clearly listened to and understood. Fundamental to care and support for children in NPT, was supporting them at home and in their communities. Practitioners knew the children and families they worked with well and have ensured positive relationships were developed.

We found the local authority has worked hard to shape its services in the context of the Act. The local authority's Information, Advice and Assistance function was delivered through the Single Point of Contact (SPOC) service which provided a distinct access point for children with eligible need and for preventive interventions. There were clear pathways established to facilitate early intervention, help for families and clarity about the prevention offer, both in youth justice and social care.

Although disrupted by the pandemic, strategic partnership support for management of risk was evidenced by investment in relevant (joint) staff training across the partnership; some single agency and on-line training has been sustained during the pandemic. Robust safeguarding training delivered by the local authority has effectively supported schools to recognise early indicators of exploitation, as well as enhanced training for school staff who educate and support highly challenging young people known to be at risk.

The Youth Offending Service (YOS) has embarked on an improvement journey resulting from a poor inspection outcome for the previous

consortium arrangements in 2018. The service is now fully integrated within NPT and has a number of plans in place to address the shortcomings previously identified. Practice is improving as a result. The YOS and the police have a shared understanding of the importance of avoiding formal criminal justice outcomes for vulnerable children where appropriate.

Significant changes have occurred in the probation sector over the past year. The inspection week coincided with the launch of the new probation service resulting from the merger of the private sector community rehabilitation companies and the public sector national probation service. Many of these changes were implemented 18 months early in Wales and the new unified probation service has a head start in NPT. The size and scale of this change cannot be underestimated. The partnership needs to understand the implications of these changes and assure itself the systems and processes designed to safeguard children, are consistently and effectively implemented. This includes effective information sharing arrangements, consistent attendance at operational and strategic partnership meetings and access to briefings and training on local child safeguarding priorities, including exploitation.

Senior managers in the Swansea Neath Port Talbot Probation Delivery Unit were determined to make the new probation structures work. They recognised the challenges involved. The pandemic adds a layer of complexity and means staff cannot develop peer networks in the new organisation in the office setting that would normally take place. There are local advantages, the private and public sector organisations were previously colocated and so there are some working relationships established between staff in the two constituent agencies.

South Wales Police (SWP) demonstrated a clear commitment to child protection and tackling exploitation of children in NPT. This was evidenced by the priorities in the Police and Crime Commissioner's (PCC) Police and Crime Plan and the Chief Constable's Delivery Plan. The force was also proactive in producing and reviewing other strategic

plans and assessments in line with changing or emerging threats. The best examples of police safeguarding vulnerable children included prompt action to identify those at risk and information exchange across police teams and partners.

SWP has undertaken a programme of training to upskill staff in issues relating to vulnerable children. This has included widespread training on Adverse Childhood Experiences (ACEs) and a trauma informed approach under the Early Action Together Programme (EAT). More bespoke training has been provided to call handlers, custody officers and the Public Service Centre (PSC) missing person team.

School staff understood early identification, assessment, communication and intervention are vital across all stakeholders. They recognised the ongoing threat of young people being exploited and that effective safeguarding child protection work requires; robust procedures, good interagency cooperation and a workforce that is competent and confident in responding to situations. There was close working with other agencies with an ethos that was child-centred. School staff focused their work on the context in which the child and their family found themselves and recognised the needs of children on their journey to adulthood, with a commitment to ensuring quality of provision to meet these needs.

The local authority promotes a high level of inter-agency working across schools. There was evidence of close working relationships across services in supporting the needs of highly complex young people and their families. Education officers and school staff were routinely involved in safeguarding multi-agency meetings. The Education and Lifelong Learning Directorate promotes a strong culture of inclusivity. Schools access support and guidance from teams across the directorate.

We identified Swansea Bay University Health Board (SBUHB) safeguarding leadership teams have oversight of front line healthcare services, and there were good processes in place for reporting to

appropriate governance groups and committees. We also found examples where staff described good engagement with safeguarding leads in both primary and secondary care. There was an appetite for ongoing improvements driven by safeguarding leads at both operational and corporate levels.

There was good safeguarding knowledge and awareness demonstrated across health care staff and GPs. There was good communication between different health disciplines, although some staff reported inconsistencies. Robust safeguarding processes were observed in both the Emergency Department (ED) and Minor Injuries Unit (MIU), with innovative practice developments and a strong learning culture evident. Processes to identify when a child attending either setting was subject to a care and support protection plan were in place' (JICPA: Final Letter, dated 16th September 2021 pp 3-5).

Background

'Between 28 June and 2 July 2021, Care Inspectorate Wales (CIW), Her Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS), Healthcare Inspectorate Wales (HIW), Her Majesty's Inspectorate of Probation (HMIP) and Estyn carried out a joint inspection of the multi-agency response to abuse and neglect in Neath Port Talbot (NPT). This inspection included an evaluation of how local services responded to child exploitation.

The JICPA reviewed:

- the response to exploitation at the point of identification
- the quality and impact of assessment, planning and decision-making in response to notifications and referrals
- the protection of children and young people at risk of exploitation, (evaluated through a deep dive assessment of the experiences of these children)
- the leadership and management of this work
- the effectiveness of multi-agency safeguarding partner arrangements in relation to this work'.

(JICPA: Final Letter, dated 16th September 2021 p1).

This report and accompanying papers is therefore shared with Cabinet for Information and Monitoring purposes only. The findings set out above will be taken forward and addressed through the Joint Action Plan, which will be overseen by the Safeguarding Board, the NPT Corporate Safeguarding Group and by each respective agency through their own over-sight committees/panels/groups. The findings will also be followed up by each Inspectorate through their future work programme.

Financial Impacts

No implications.

Integrated Impact Assessment

There is no requirement to undertake an Integrated Impact Assessment as this report is for monitoring / information purposes.

Valleys Communities Impacts

No implications.

Workforce Impacts

No implications.

Legal Impacts

No implications.

Risk Management Impacts

The 'JICPA Joint Action Plan' aims to strengthen the existing response to exploitation across the partnership and in doing so reduce the risk of harm outside of the family across the County Borough.

Consultation

This item, specifically the 'JICPA Joint Action Plan', has been subject to external consultation between partner agencies.

Recommendations

That Members note and monitor that the partners will create a 'Joint Action Plan' addressing those 'Areas for Development' identified in the final letter. The broad areas identified requiring improvement across the partnership being:

- Assessments
- Outcomes
- Voice of the Child/Family
- Referrals/Reports/Communication
- Planning
- Meetings
- Response to harm outside the family home/Safeguarding
- Multi –Agency Public Protection Arrangements (MAPPA)
- Services
- Improve initial response to missing children reports

Reasons for Proposed Decision

This item is for Information and Monitoring only.

Implementation of Decision

As this is for information there is no implementation of decision required.

Appendices

Appendix 1 – *Joint Inspection of Child Protection Arrangements (JICPA): Neath Port Talbot County Borough Council, Swansea Bay University Health Board, Wales National Probation Service, South Wales Police. Final Letter, dated 16th September 2021.*

Appendix 2 – *JICPA Joint Action Plan, dated 14th October 2021: Version 1.*

Officer Contact

Andrew Jarrett, Director of Social Services, Health & Housing email: a.jarrett@npt.gov.uk

Andrew Thomas, Director of Education, Leisure and Lifelong Learning email: a.d.thomas@npt.gov.uk

Mae'r dudalen hon yn fwriadol wag

Mark Hackett, Chief Executive, Swansea Bay University Health Board
 Emma Woollett, Chair, Swansea Bay University Health Board
 Andrew Jarrett, Director of Social Services, Neath Port Talbot CBC
 Keri Warren, Head of Children and Family Services, Neath Port Talbot CBC
 Andrew Thomas, Director of Education, Neath Port Talbot CBC
 Karen Jones, Chief Executive, Neath Port Talbot CBC
 Ali Davies, Principal Officer, Youth Justice & Early Intervention Service
 Jeremy Vaughan, Chief Constable, South Wales Police
 Alun Michael, South Wales Police and Crime Commissioner
 Nic Davies, Regional Probation Director, Wales

Date: 16 September 2021

Dear Colleague,

Joint Inspection of Child Protection Arrangements (JICPA): Neath Port Talbot County Borough Council, Swansea Bay University Health Board, Wales National Probation Service, South Wales Police - June 2021

Between 28 June and 2 July 2021, Care Inspectorate Wales (CIW), Her Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS), Healthcare Inspectorate Wales (HIW), Her Majesty's Inspectorate of Probation (HMIP) and Estyn carried out a joint inspection of the multi-agency response to abuse and neglect in Neath Port Talbot (NPT). This inspection included an evaluation of how local services responded to child exploitation.

This letter outlines our findings about the effectiveness of partnership working and of the work of individual agencies in NPT. Please confirm receipt of this letter to CIWLocalAuthority@gov.wales.

Scope of inspection

The JICPA reviewed:

- the response to exploitation at the point of identification
- the quality and impact of assessment, planning and decision-making in response to notifications and referrals
- the protection of children and young people at risk of exploitation, (evaluated through a deep dive assessment of the experiences of these children)
- the leadership and management of this work
- the effectiveness of multi-agency safeguarding partner arrangements in relation to this work.

We have endeavoured to use plain language to describe the findings from the JICPA. There are a number of terms mentioned we describe here:

Term or Phrase	Definition
ACEs	Adverse Childhood Experiences
ACC	Assistant Chief Constable

BCU	Police Basic Command Unit
CAMHS	Child and Adolescent Mental Health Service
Care Experienced	A child or young person who is either looked after or who has previously been looked after (for example an older young person who has 'left care' aged 18, a child who has returned to birth family, or an adopted child)
CAWNs	Child Abduction Warning Notices
CCE	Child Criminal Exploitation
CLA	Children Looked After A child or young person who is currently in the care of the local authority
CPR	Child Protection Register
CSE	Child Sexual Exploitation
CSERQ	Child Sexual Exploitation Risk Questionnaire
DTR	The statutory <i>duty to report</i> to the local means a referral to social services who, alongside the police, have statutory powers to investigate suspected abuse or neglect.
EAL	English as an Additional Language
EAT	Early Action Together Programme
EWO	Education Welfare Officer
ED	Emergency Department
FAST	Family Action Support Team
ISHU	Integrated Sexual Health Unit
LBGTQ+	Lesbian, gay, bisexual, transgender, queer or questioning
LIO	Police Local Intelligence Officer
MIU	Minor Injuries Unit
MAPPA	Multi-agency public protection arrangements are designed to protect the public, including previous victims of crime, from serious harm by sexual and violent offenders
NAIRA	No Apparent Immediate Risk – Absent Police new risk grading for missing children
NEET	Not in education, employment or training
NRM	National Referral Mechanism
PCC	Police and Crime Commissioner
PCSO	Police Community Support Officer
PPN	Public Protection Notice
PSC	Police Public Service Centre
PPU	Police Public Protection Unit
RSE	Relationships and sex education
SPOC	Local Authority led partnership in Single Point of Contact
SWP	South Wales Police
SBUHB	Swansea Bay University Health Board

THRIVE	Police risk assessment tool used to assign a priority level to an incident
WGCADA	West Glamorgan Council on Alcohol and Drug Abuse
YJEIS	Youth Justice and Early Intervention Service referred to as YOS
YOS	Youth Offending Service

Summary of findings

The local authority and partners (the partnership) have exercised functions under the Social Services and Well-being (Wales) Act 2014 (the Act) and strive to ensure these make a positive contribution to the well-being and safety of children who need care and support. Their work was supported by a positive approach to regional safeguarding arrangements with strategic managers proactive in progressing key areas.

We found suitable structures and relationships in place to facilitate effective partnership working where a child was at risk of exploitation. Statutory functions in relation to promoting safety and well-being were being fulfilled. Partners, both statutory and third sector providers such as St. Giles and Barnardo's, were working to a shared ethos of safeguarding children and young people at different levels of vulnerability. This was evident as leaders within these organisations clearly articulate a shared vision. Managers have worked purposefully across the partnership to support identification of and to tackle exploitation. We found a culture of relationship building with people at the heart of practice across organisations.

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Delivery Plan. The force was also proactive in producing and reviewing other strategic plans and assessments in line with changing or emerging threats. The best examples of police safeguarding vulnerable children included prompt action to identify those at risk and information exchange across police teams and partners.

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We identified Swansea Bay University Health Board (SBUHB) safeguarding leadership teams have oversight of front line healthcare services, and there were good processes in place for reporting to appropriate governance groups and committees. We also found examples where staff described good engagement with safeguarding leads in both primary and secondary care. There was an appetite for ongoing improvements driven by safeguarding leads at both operational and corporate levels.

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Well-being

Strengths

Safeguarding processes were understood across the partnership. Safeguarding meetings were well attended by partners, were timely and proportionate, and information was shared. Risks and needs were analysed with multi-agency actions set to safeguard and manage risk.

Across the partnership we saw daily communication through formal and informal mechanisms and escalation processes applied when appropriate. There were various examples of a proactive approach to ensure thresholds were understood across agencies. The multi-agency peer review meetings for example, provided opportunity for dialogue about children where operational issues had been identified.

Children's services practitioners have a clear understanding of child protection procedures. Initial decision-making seen was timely and there was evidence of management oversight. When a Duty to Report (DTR) was received by SPOC there was clarity in relation to indication of significant harm, with prompt and proportionate initial action taken to protect children. There was clear evidence staff recognised the signs of exploitation and the risks associated. Social workers demonstrated a good understanding of the impact of domestic abuse on children, information sharing around domestic abuse was also evident.

We saw some examples of the police mitigating risk and disrupting perpetrators for children at risk of CSE. This included providing briefings about at risk children to frontline police officers, patrolling hotspot locations and robust policing of bail conditions and curfews to protect children. The police made use of Child Abduction Warning Notices (CAWNs) to restrict perpetrator access to children and provide further safeguards.

The review of cases highlighted several National Referral Mechanism (NRM) investigations. The quality of these investigations varied, but where an investigation was conducted by detectives, the response was timely and the investigation was comprehensive, providing the best opportunity to identify and pursue offenders. In other investigations we saw wider risk to other children or from perpetrators was not always identified and acted upon.

We saw police call handlers recognised children as vulnerable and completed THRIVE risk assessments to support the prioritisation of calls for service. They have immediate access to the most up to date information held on Niche and Control Works (call logs). This includes warning markers for children who are at risk from criminal exploitation or have a care and support protection plan. This not only supports their decision making but provides front line staff with the necessary information to support their response.

When children had been categorised as missing from home or care, there was clear supervisory oversight, both within the PSC and the Basic Command Unit (BCU). In addition, the records detailed appropriate risk assessments, and, in most cases, officers were proactive in trying to locate the child. This was not the case for children categorised as 'No Apparent Immediate Risk – Absent' (NAIRA).

When a child is accepted onto the CSE protocol, we saw evidence of the use of a police master occurrence log for recording the outcome of all multi-agency meetings. Strategy meetings and multi-agency meetings were well attended by staff and records provided detailed accounts of the information shared by partners and the agreed safeguarding plan. These records were added to Niche, which ensures officers and staff can quickly access information that will support their action and decision making.

The quality of return home interviews was good. These were shared with partner agencies in a targeted manner, providing professionals with new information about the child's experience. The Barnardo's worker provides an effective conduit between police and social

services, enabling workers to identify ways to reduce missing episodes, emergent needs and to adapt plans to manage risks. Critically, this service gives children a stronger voice.

The police missing team has links to intelligence officers. They ensure information and intelligence is drawn out from return home interviews, with associates and locations updated on records and intelligence logs created where appropriate. This means information can be used to help prevent future missing episodes, and to locate the child should they go missing again.

We found positive use of the Child Sexual Exploitation Risk Questionnaire (CSERQ) screening tool by Children Looked After (CLA) Nurses, ED and the MIU staff, to support early identification of CSE. Appropriate referrals were made where required. All children attending the ED were checked to establish if they were named on the Child Protection Register (CPR) which staff at ED and MIU had access to. Staff we spoke with at the ED knew of the existence of the CPR and told us about a tick box on the triage card. This meant if required staff could share key information with multi-agency partners. In most cases where it was required, we identified body mapping of injuries being used in MIU, but this was not consistent in the ED.

GPs and healthcare staff had good knowledge and understanding in relation to both individual and their teams' professional responsibility towards safeguarding and protection of vulnerable children. Appropriate coding systems were noted in GP records. The systems we viewed provided prompts to practitioners highlighting if a child had a care and support protection plan, was a child in need or a child looked after. This meant all practitioners had access to key information prior to and during consultations with parents and children.

The Contextual Risk Panel has rigorous processes in place to quality assure practice and identify further support where appropriate. This forum provides benefits across the partnership but specifically from the perspective of education, this offers a valuable opportunity for sharing of information to provide a coherent approach to identifying and managing pupil needs.

The youth service has strong working relationships with Careers Wales to support post-16 learners. Levels of support vary across tiers, for example at Tier 1, the service intervenes with hard to reach pupils who are highly vulnerable and are not in education, employment or training (NEET). The Youth Service works well with the local authority CLA team to prioritise support for CLA and care experienced young people. This targeted support, along with that provided by Cynnydd, is effective in providing additional support for those young people who potentially are at risk of becoming NEET. This work is contributing to the relatively low reported number of young people who are NEET in the county.

The school based counselling service was committed to supporting young people across schools and has been proactive in its approach throughout the pandemic and as pupils return to full time education. They are seeing an increase in referrals to the service as pupils return. Schools have increased their support for pupils' mental health by expanding their capacity to provide interventions using initiatives such as Emotional Literacy Support Assistants and enhancing school based counselling services. This has helped reduce the risk of deteriorating mental health due to the delay in support from Child and Adolescent Mental Health Service (CAMHS). Pupils as young as five years can now access school based counselling services.

The local authority has developed a successful network of support in all secondary schools and the college provided by the Cynnydd service. Schools and social work staff consistently reported on the high quality of support, advice, and guidance Cynnydd staff provide working with identified pupils. As part of the local authority Early Intervention Panel outcomes, Cynnydd workers can be directed to support specific pupils who are on the cusp of requiring statutory care and support plans.

There have been strong school inspection outcomes for care, support and guidance including safeguarding; in the last three years all schools received good or better judgements for Estyn's inspection area 4 (Care support and guidance including safeguarding). This is higher than the national average for both primary and secondary schools.

Secondary schools have strong pastoral programmes for pupils at risk of Child Criminal Exploitation (CCE) and CSE. Secondary head teachers said this work has been strengthened significantly over recent years and they are confident their pupils are given the right information and skills to help them deal with challenges within their community.

The majority of schools were sharing information appropriately when a vulnerable pupil moved from one school to another school. Many schools use an online platform for this purpose, however, there were concerns a minority of schools do not always share important information when a vulnerable pupil transfers. Schools acknowledged the work of the Wellbeing team in supporting transition but had concerns the service may not have the capacity to support pupils consistently.

The quality of information recorded on SPOC DTR forms submitted from schools varied, but overall, they provided SPOC staff with sufficient information to make a decision on next steps. The quality of referrals from schools has improved significantly over recent years due to training and the common format now used for all DTR. Schools are more skilled in supporting positive outcomes for children and their families.

In line with their child protection policy, nearly all schools had appropriate systems in place for staff to refer concerns to designated safeguarding officers. In most instances, school officers ensured DTR forms were processed in a timely manner. In nearly all schools, staff recognised the signs a pupil may be involved in CCE and CSE.

Education Welfare Officers work with primary school clusters and have been successful in reducing the rate of persistent absenteeism. The local authority keeps data on the attendance of pupils named on the CPR; rates range from 0% to over 95%. Access to data linked to school absence is important given the link between pupils not being in school and increased risk of exploitation.

The YOS have access to a wide range of resources and specialist staff and can respond to the complex needs of children at risk of offending. Staff use both therapeutic and restrictive interventions, for example curfews and exclusion zones. Many young people reported restrictive measures helped them stay away from high risk situations.

The YOS are respected by colleagues and they drive innovation both in their own practice and with their partners. They have adopted contextual safeguarding principles and their

community risk profiling meetings are an example of this approach. Where they identify a locality presents risks to children such as a public park where drug dealers operate, they work with partners to explore opportunities for disruption. This work is at an early stage and not all relevant agencies are participating yet. They have developed an understanding of the local drug market and how children can become involved in it.

Areas for Development

Contextual safeguarding is a key concept at the core of NPT's partnership approach to safeguarding. The probation staff we met, however, were unaware of the term. We found the contextual safeguarding agenda also needs to be strengthened further across all schools. There is a need to ensure staff across all agencies understand the interconnections in relation to contextual safeguarding (extra-familial risk) and the role played by carers and parents in promoting well-being and safety.

While responses were mainly timely, the quality of children's services assessments was inconsistent. The format of documentation was helpful but a more explicit focus on strengths and outcomes was required and the child's voice was not always captured well enough. Whilst the majority of assessments identified risks, more rigorous analysis including the impact on the child was needed to effectively inform planning.

There was a commitment to the use of safety plans that identified the child and families' own support networks. The relationship between this and care and support plans needs to be more clearly defined. The development and implementation of safety plans requires attention, greater clarity is required in making these focused documents to support care and support safeguarding arrangements. Partners also need to take shared responsibility for the implementation of safety plans. Similarly, whilst strategy meetings were being held with appropriate representation across agencies, the quality of the minutes was inconsistent and often lacked specificity and clear actions.

All staff across agencies were enthusiastic about the concept of contextual safeguarding being developed. It was noted a number of complex pathways were being developed to respond to the range of risks identified. This creates potential confusion for partners who need to ensure planning is consistent and clear with regard to the inter-relationships between contextual safeguarding and other child protection processes. The risks posed or safeguarding needs of others, including siblings, involved in the same incident or on the periphery were variably addressed across agencies.

Some partners were insufficiently familiar with Multi-Agency Public Protection Arrangements (MAPPA) and the significance of this process in the management of risk and the safeguarding of criminally exploited young people. Some agencies also underestimated the serious risk some of these young people pose to others. For some situations we saw how MAPPA could have brought these perspectives together into a credible multi-agency approach to managing risk and to safeguard a young person. Conversely, we also found some young people who had been made subject to MAPPA procedures where the combined risks they faced, and the risk they posed to others, would have been better managed in an alternative forum.

In the small number of probation cases reviewed there was insufficient professional curiosity which impacted on risk assessment and management. Information was available

from partner agencies such as the YOS and social services which would have assisted in making assessments, however, this was not always sought by the probation practitioner.

Staff at the Integrated Sexual Health Unit (ISHU) did not consistently have access to CPR information and were reliant on self-disclosures from children or family members. This meant staff could miss opportunities to identify risk factors and seek further information from other agencies if required. SBUHB should review the processes in place to ensure ISHU are aware of how to access this important information in a timely manner.

In some cases, we found police officers used inappropriate language to describe at risk children. Comments included 'appearing to be streetwise' and 'not unusual behaviour as he goes missing every night'. These comments demonstrate a lack of awareness by some officers of the risks faced by these children. More should be done to ensure staff have the required skills and knowledge.

The force has introduced a new risk grade for missing children, NAIRA. This can be used for children aged 14-17 years. NAIRA cases are managed by a new missing person team within the PSC. This team should confirm that the case is appropriate to be managed as NAIRA and contact the reporting person to discuss what actions they should take to try and locate the child. The NAIRA category can be used for up to six hours (or until 3am when the team finish working) at which point the incident will be escalated to medium risk. In some cases we looked at, children at significant risk were assessed as suitable for NAIRA despite clear warning markers, credible intelligence, and multi-agency information and plans being taken account of during the risk categorisation process. It is our assessment that the application of the NAIRA policy for these children did not fully consider the contextual risks they face, and instead focused too much on the circumstances of the immediate missing episode. This had potentially left the risks that are well recognised across the partnership unmitigated and unmanaged.

Public Protection Notice (PPN) forms were mostly submitted promptly to SPOC. The quality of information recorded on the PPNs was variable and the outcome of the referral was often not recorded. The relevant contextual information and details of other children involved in an incident were not consistently recorded and wider risk was not always explored. Consequently, opportunities to engage, safeguard, build rapport, and intervene were not always taken. In most of the cases we looked at there were examples of PPNs not being submitted and shared with partners, including those subject to NAIRA, missing, low level crime, ASB, and stop and search. This results in partners not being able to make effective decisions based on all the available police information for a child.

In CCE cases, we saw little evidence that co-ordinated police disruption tactics were being used routinely to protect children. There was some reference to briefings being prepared but there was no evidence of formal tasking and coordination to disrupt perpetrators and gather intelligence. In addition, we did not see any evidence that response, trigger or disruption plans were being used to support frontline staff to identify individuals and locations and focus their efforts to find, engage and safeguard children as well as gather valuable intelligence.

People

Strengths

Practitioners across the partnership made significant efforts to engage with children. For example, our review identified how police officers engaged with children and their families and sought their views, their representations, and concerns on visits and prevention interviews. CSE minutes reflected the commitment, persistence and flexibility of the approaches used by staff to encourage young people's engagement.

In children's services teams have close links with the participation and engagement officer, with current work focusing on how paperwork can better capture the child's voice for children looked after. Over the pandemic, the participation officer led on the development of a digital platform to support young people's well-being and address loneliness.

We noted an Active Offer for those who wish to communicate in Welsh. This was seen across health and social care and in educational services. Welsh speakers were also located in the SPOC. In relation to health services we were told an active offer for those who wished to converse in Welsh was available, this was evident across the health board from GP services through to ED and school nurses.

The Youth Voices Conversation Project is a good example of a child-centered approach to engage with and seek the views of children about things they are concerned about relating to policing and community safety. During May and June 2021, 800 young people across the force provided feedback. Themes have been drawn together for each BCU and for NPT include knife and violent crime, drugs, and underage drinking and smoking. Young people presented their findings to the PCC, an Assistant Chief Constable (ACC) from SWP and the Children's Commissioner for Wales. Recommendations have been drawn up about how the police intend to improve services for children and young people.

The health board's Corporate Safeguarding Team supports SBUHB to implement its duties to safeguard children, young people and adults at risk within the statutory framework. The team addresses the most pertinent issues the health board may encounter regarding children and adults at risk, along with issues such as violence against women, modern slavery and Deprivation of Liberty Safeguards (DoLS). To monitor and manage incidences of safeguarding and any cause for concern, the team monitors all safeguarding alerts triggered via its electronic incident management system. This is positive as it allows the team to capture incidents that do not specifically require the submission of a safeguarding report or referral. This allows for the collation of information and to share learning in relation to safeguarding across teams.

Along with all health boards in Wales, SBUHB is required to complete an annual Safeguarding Maturity Matrix (self-assessment tool), to evaluate its quality of care, to identify improvements, and to review compliance against agreed standards of care. It is positive to note that actions have been completed by the Health Board following the last assessment. We were told any learning or actions are disseminated across the relevant healthcare teams throughout the Health Board. This is a positive action to help improve practice overall in relation to safeguarding, the protection of vulnerable children and those at risk of exploitation or harm.

SBUHB has undertaken bi-annual audits to monitor if the CSERQ tool has been used appropriately. We saw evidence of compliance with this process. We were told all published Child Practice Reviews are presented to the Safeguarding Committee, and any learning points or recommendations are included in the Health Board Practice Review Action Plan. For shared learning, action plans are disseminated as appropriate to the relevant service groups, and progress related to this is monitored by the Safeguarding Committee. Evidence of audits on children who attend ED was noted. The audit included key information to establish: if the child was a persistent attender, if details of accompanying individual had been obtained, if a CPR check had been undertaken, and if a CSERQ form had been completed with all relevant information. This demonstrated SBUHB had appropriate checks and balances in place.

Each SBUHB service related to children has relevant safeguarding leads. We found good processes in place to feed in to appropriate governance channels such as departmental, directorate and corporate safeguarding meetings, and committees. To support staff in their day to day work, and where immediate advice is required, the Health Board has a dedicated intranet safeguarding page easily accessible to staff.

The paediatric wards and other departments (such as ED), which provide services to children, take the views of children and young people into account when consulting with them. CLA Nurses attempted to engage the child and to capture their voice within the Statutory Health Assessment process.

The children's services senior management group work coherently and were visible across the workforce. This means practitioners feel 'safe', with sharing risk decisions. We met with highly committed and motivated professionals who demonstrated a good understanding of the nature of work in relation to children and families who are at risk or are experiencing exploitation. We recognised the complex nature of this work. The social work workforce is stable and the position in relation to recruitment and retention is positive. Work-load is on the whole manageable, this is significant as it allows practitioners the opportunity to be reflective in working with complex circumstances.

There was innovative thinking across the children's services senior management group, they were willing to test new ways of working, for example, changes in relation to contextual safeguarding. The local authority is forward thinking in terms of being engaged in several projects working with academia.

The local authority gives regard to the rights of children to be offered formal advocacy. From the information provided, we found evidence children were offered access to advocacy services; the offer was not always accepted.

Evidence from children's services case files demonstrated consistency of supervision, opportunities for case consultation and management oversight of good quality. Practitioners valued the approachability and experience of managers; they told us they felt well supported, enjoyed working for the local authority and there was a supportive culture.

In SPOC, the quality of threshold decision-making was mainly consistent and the context to decision-making was evidenced in the manager's comments and at sign off points. In review of records we noted the local authority's quality assurance systems identified a file

had been prematurely closed and was subsequently re-opened for further assessment and exploration of potential risk.

Learning and development for local authority staff has continued through the pandemic, with consultant social workers supporting a culture of development across the service. Staff reported the quality of exploitation on-line training was good.

Work has been undertaken to develop a toolkit to support decision-makers to respond effectively and consistently to harm outside of the family home. It is meant as a guide/checklist to help inform existing mechanisms for decision, assessment and planning. It is still being piloted and so was not well known to all staff, nor partners, and the intention is to evaluate its usefulness through the Quality & Performance Management Group.

There was strong leadership from the local authority officers who strategically and operationally actively promoted an effective safeguarding culture across all schools. The Education Safeguarding lead officer is skilled and knowledgeable, and her professional advice and support was valued by all schools.

There was strong evidence of beneficial collaboration across teams in the Education service to promote effective sharing of information, a culture of reflection and challenge to consistently seek to improve the quality of support available to schools. Head-teachers said education lead officers were approachable, and their views were listened to.

The local authority has a secure overview of safeguarding practices in all schools with clear structures and processes in place to quality assure practice. All schools complete a detailed safeguarding audit on an annual basis. This helps them identify their strengths and areas for improvement. Nearly all schools adopted the local authority model Child Protection policy. This includes all the elements you would expect to see in such a policy. From the sample scrutinised, all were appropriate and reviewed on an annual basis, for example to include changes in legislation or schools' protocols.

Every three years schools are subject to a peer review of safeguarding which further identifies their strengths and areas for improvement. This work includes how well schools reduce the risk of child exploitation. Where the local authority identifies shortcomings, these are then followed up with subsequent meetings and assessments. However, due to the pandemic the peer review initiative has been temporarily halted. To help mitigate the risks, the local authority will be scrutinising all schools' safeguarding audits in the autumn term and will address any concerns with schools directly.

A robust high-quality training and development programme was in place for schools delivered by the local authority. It included training on how to recognise and deal with potential CCE and CSE. This effectively supports schools to recognise early indicators of exploitation as well as enhanced training in exploitation for school staff who educate and support highly challenging young people who are already known to be at risk.

Leadership and management of safeguarding in schools was strong with identified designated safeguarding teachers having a thorough knowledge and understanding of effective safeguarding practices. In nearly all schools, staff recognised the signs if a pupil was involved in exploitation. Secondary schools in particular had strong pastoral programmes for pupils at risk of becoming involved with CCE and CSE.

Across education services there was a strong commitment to delivery of support services through the medium of Welsh. Education services could provide Welsh speakers to support young people and their families where this was identified as a need. There were sufficient Welsh language speakers throughout every team in the local authority to meet the demands from Welsh-medium schools, for example for counselling services and support from the education welfare service. Many pupils who attend a Welsh-medium school, however, request that support is delivered through the medium of English. This is particularly apparent if they come from non-Welsh speaking homes.

Ysgol Hendrefelin provides specialist support for young people, some of whom are known to be at risk of exploitation. Staff across the school have received ongoing training on the trauma informed approach, and training with Junior Smart which looked at exploitation. In addition, St Giles' Trust, the school police liaison officer and staff from the Wellbeing Team have worked closely with the school. In one case we reviewed a young person transitioning to Ysgol Hendrefelin was supported by school staff who had visited the current placement to meet with him to build a working relationship. The Cynnydd team will provide additional support. The emphasis on gaining the young person's involvement in education is crucial to distract him from potential further exposure to exploitation.

School representatives were invited to most key strategic meetings involving their pupils. They said their voices were heard and they play a key role in decision making. They often challenged the views and decisions of other professionals. A shortcoming was quite often meeting notifications were at short notice which makes it difficult to organise attendance.

The local authority has shared their framework for Person Centred Practice with all schools and have a programme to train all school staff on its implementation. They are also rolling out Rights Respecting Schools' work to all schools. Young people were consulted on a number of fronts across the local authority. For example, when the specialist unit at Dwr-y-Felin School was being planned, officers met with children to consult on how it should be established. There is a new draft policy on the participation of young people in decision making which the local authority will share with young people during the consultation process. Established in 2019, the Junior Safeguarding Board has provided valuable opportunities for children and young people to have a voice and to influence the decisions made within the local authority.

The Youth Service was one of the first in Wales to achieve the Children in Wales Participation standards. The Youth Council has won a National Youth Excellence Award for their work around children's rights. The local authority is one of very few to have an elected Youth Mayor.

The local authority run youth clubs for lesbian, gay, bisexual, transgender, queer or questioning (LGBTQ+) and Welsh speaking pupils. There was strong representation from these groups on the Youth Council. Youth council meetings were chaired by the council leader which further strengthens the importance the local authority places on the voice of young people. LGBTQ+ young people were also part of the relationships and sex education (RSE) working group that promoted changes to RSE lessons to better reflect LGBTQ+ issues.

The Vulnerable Learners' service has provided beneficial support for pupils who have English as an Additional Language (EAL). This service has capacity to respond flexibly to the needs of schools. They have seven bilingual teaching assistants who reflect the main languages within the local authority. The team were very proud of the strong academic outcomes pupils with EAL have achieved within the local authority over recent years. The Vulnerable Learner service also works with the Gypsy, Roma and Traveller communities. Staff recognised the vulnerabilities of pupils within these groups places them at risk of exploitation and work closely with the two Traveller sites to support children and their families. There was strong multi-agency working with the sites to ensure these pupils are safe and have sufficient medicine and food.

YOS staff presented as enthusiastic and showed commitment to helping children and young people. They recognised the importance of developing strong working relationships to constructively achieve positive change. This is significant as positive relationships with children and families creates trust and encourages children to disclose issues that worry them. A young person we interviewed said he had previously been allocated numerous social workers, but his current social worker, YOS worker and Cynnydd worker all listened to him and treated him with respect. Similarly, a foster carer interviewed said she felt very well supported by her supervising social worker, the child's social worker and Cynnydd worker. She expressed great trust in them and said they were respectful and easy to access.

YOS staff have all received training in recognising and responding to child exploitation. The training was delivered remotely by Barnardo's and we were provided with copies of the training material which was comprehensive. Workloads were appropriate and this enabled practitioners to provide a good quality service to children.

A finding of the 2019 inspection was the YOS management board did not understand the needs of children or the service. This position has substantially improved, and management board members have close contact with staff. The service has recently begun to invite young people supervised by the YOS to board meetings.

Areas for Development

While we found resilient social work practice in seeking the views of children and young people, there was variation in the quality and content of written records. It was positive children were seen and seen alone but the good social work practice we heard about to elicit the child's wishes and feelings was not consistently well reflected in the content of assessments and some were too adult focused. Inconsistency in recording the voice of the child was also evident in police records.

We found What Matters conversations recorded in social services records, but these could be improved with greater clarity about what needs to happen to achieve personal outcomes. It was positive workers see themselves as advocates for the children they work with but it was less clear there was a shared understanding of the added value and function of independent advocacy. This is an area that needs to be refreshed to ensure it is promoted more robustly. Working with a new provider, National Youth Advocacy Service could provide this opportunity.

During interviews social services staff were able to describe the significance of strength based outcome focused work but the 'lived experience' of the child was not always apparent in records. Whilst the local authority works with an outcomes focused ethos we found further development and embedding of a strengths based approach to practice was needed. Many examples of record keeping were not clearly outcome focused, were often overly descriptive and lacked a clear indication of children's strengths, what professionals were concerned about and what is expected from children, carers and professionals to ensure safety and to achieve desired outcomes.

Children's services assessments often did not sufficiently include a sense of the child in the context of the wider family. It was particularly noted the significance of the children's relationship with their siblings and the extended family was not always explored. Identification of risks was not always sufficiently robust or outcome focused to support the child and family to understand the required focus of change.

We did not see consistent evidence of the shared implementation and review of safety plans. In some cases, there was lack of clarity about which agencies were responsible for addressing which aspects of safety and well-being concerns. Professionals, children and families alike can also be overwhelmed by the lack of coordination in terms of the delivery of multi-agency services. We heard due to the pandemic, assessments were not always shared with families although social workers spent time going through the assessment with them.

Safeguarding supervision and support is an essential component of clinical governance, ensuring continuous improvement in the delivery of high quality care to service users in accordance with the All Wales Safeguarding Best Practice Supervision Guidance. We were told that the health board uses a variety of models for safeguarding supervision, however, through our staff interviews we found that safeguarding supervision was inconsistent across the health board with some staff telling us this frequently takes place, whilst others told us there were no systems in place for safeguarding supervision. Nonetheless, all staff we spoke with told us there were good relationships, communication and support from the safeguarding leads in the health boards. The health board should therefore ensure that the provision of safeguarding supervision is consistent with all relevant staff across the health board.

Following a training needs analysis in 2019/20, SBUHB identified as a minimum, all staff groups are required to complete Level 2 Safeguarding Adult and Children Training. This training is available via eLearning and needs to become part of the SBUHB Board wide mandatory training monitoring requirements. SBUHB must promptly prioritise staff access and study time to complete this training.

In the absence of multi-agency face to face exploitation training during the pandemic, SBUHB ensured some exploitation content was included in their Level 3 training. Full day face to face exploitation training is scheduled to resume in the near future.

SBUHB staff spoken with generally had a good level of knowledge and understanding in relation to exploitation, however, there were mixed reports on the training staff had received, this was consistent with the SBUHB decision to pause training for exploitation in

response to the pandemic. When the training recommences this will also be available to staff in primary care, such as GP practices.

There were some gaps in training for the police, for example role specific training for referral unit officers. We also saw individual officers were not demonstrating a comprehensive recognition or knowledge about child exploitation issues, which indicates further work needs to be done to ensure officers and staff are fully aware of what is expected of them.

In the YOS's desire to improve the quality of their service they have developed multiple service improvement plans. Monitoring progress across these plans is complex and time consuming and they were considering how these processes could be rationalised to make them more manageable. A wide range of meetings and forums, both internal to the YOS and through partnership arrangements, have been developed in response to the needs and risk factors associated with specific children. Practitioners described meeting congestion occurring where multiple meetings with overlapping purpose were held on the same child in quick succession. Some of the YOS initiatives were in the early days of development and there was not always an awareness of them among across the partnership. It will be important to ensure these are evaluated.

We found the perceptions of probation managers and staff about the service's ability to focus on safeguarding differed. For example, managers viewed the temporary measure of a 'doorstep visit' as providing some safeguarding assurance where there are children in an adult offender's home. Practitioners were more cautious stating because they often relied on colleagues to make these visits they felt there were limitations on the extent to which they could be relied upon. There are significant issues to resolve as new processes and structures start to take effect.

Probation staff described their workloads as being high although this is an issue throughout the probation service. Training for probation on general child safeguarding was evident but there was no specific training on exploitation. There was a general lack of knowledge about the NRM. There was lack of knowledge regarding safeguarding procedures and sharing of information processes (particularly between probation and YOS).

Partnerships and Integration

Strengths

We found partners identified risks to children and reported safeguarding issues promptly. As an example, the police have a system to monitor referrals over the weekend allowing response to urgent issues. SPOC benefit from timely and efficient initial processes in relation to referrals. Early prioritisation means children at risk of significant harm are quickly identified and receive immediate attention. We noted some agencies had beneficial access to each other's systems, namely YOS and social services, with SBUHB having access to the CPR on the local authority system.

There was a clear and well-understood process for professionals to refer concerns about children to the SPOC, initially by phone and through the completion of an integrated referral form or in the case of the police, PPN forms. The Integrated Referral form promoted consistency and was jointly developed by multi-agency partners, with time additionally

spent on training in its completion. This has been time well spent, with the quality of referrals having reportedly improved. The form clearly guides the referrer through the provision of information to ensure this assists the decision-making process. The quality of the referrals was generally satisfactory to enable the SPOC to make next step decisions. Issues of consent were mainly addressed and SPOC staff routinely undertook proportionate agency checks as part of the screening process.

Strong relationships and close working together were evident between key partners in SPOC and effective information sharing and decision-making was evident. For example, the Police Referrals Unit has been embedded in the SPOC team since November 2019. This has resulted in increased levels of contact and shared understanding. This similarly applied to the health professional aligned to SPOC.

The probation 'front door' is at court and also when child-safeguarding issues emerge in cases. Making links between risky adults and vulnerable children can be complex because they often have different surnames and addresses. There are systems in place to exchange information and these were mostly effective in the cases reviewed.

A further example of inter-agency co-operation was health visitors sharing important information with primary schools when children start nursery education. As most health visitors know children very well, this helps school staff address pupils' needs at the earliest opportunity. Communication between children's services and special schools was particularly strong.

There was strong evidence of multi-agency approaches to assessing and analysing intelligence to inform safety planning. For example, children's services and Cwm Brombil School have trialled local triangulation meetings with partners. These provide a valuable opportunity to discuss young people and identify links involving the police and YOS to map important connections between individuals, potential perpetrators, and community locations. Currently the local authority is developing terms of reference for this approach to be rolled out across the local authority.

Children and families benefit from a well-developed early intervention offer, available through the SPOC and YOS. The multi-agency early intervention panel provided additional management oversight of thresholds, constructive challenge and access to appropriate services and resources. There were good joint working arrangements identified, for example the Police Community Support Officer (PCSO) embedded in the Team Around the Family (TAF), was a member of the Early Intervention Panel and attended home visits with TAF workers. This allows any policing concerns to be identified and addressed at an early stage and supports positive relationships and a multi-agency ethos of early identification and prevention.

These arrangements help improved understanding of professional roles and more flexible management of service thresholds supporting the council's ambition that people be directed more easily between social services and early intervention services. We saw examples of information, advice and assistance (IAA) being easily accessible with people signposted to preventative services.

Organisations within the partnership invest in an extensive range of support and therapeutic services, including from the third sector used in both the preventive environment and to

support children, young people and their parents/carers to achieve positive outcomes from statutory interventions.

Schools have access to an effective range of internal support interventions in consultation with other agencies. The Education Safeguarding lead officer provided valuable support and guidance for all schools and has a pivotal role in working across agencies. The Cynnydd workers, as part of the Well-being Team, worked across all secondary schools and the college. They consistently develop positive and strong working relationships with identified pupils.

We found partner agencies provided support to detained children in police custody suites. These include Dyfodol referral workers from the Kaleidoscope project and health care professionals. This means children have access to support relevant to their health and vulnerabilities, with signposting and interventions put in place.

We were told about a pilot project starting imminently between local authorities, SWP, Gwent Police, Dyfed Powys Police and the Welsh Government regarding the provision of an alternative accommodation bed for children detained in police custody post-charge. This is a positive development as detaining a child in a police station for longer than necessary, except in very rare circumstances, is not in their best interests.

The local authority contextual risk panel met regularly to discuss young people at risk of exploitation. This multi-agency team plan actions and support to young people affected by extra-familial exploitation. Where agencies have identified serious issues within a local community, agencies worked closely with schools to discuss concerns and to agree actions to support young people and to provide guidance within the school.

Health services worked well to ensure prompt sharing of information. GPs demonstrated good partnership working with evidence of engagement with school counsellors and YOS services. GPs indicated although they do not attend strategy meetings, they provide reports for meetings to share relevant information, ensuring key patient information is shared for multi-agency partners to make an informed decision during meetings.

We saw evidence of GPs and schools working collaboratively with children to ensure there was input from a school counsellor when services from CAMHS were not available. In addition, school counselling services were also proactive in engaging with GPs when intervention from CAMHS was required. This demonstrated key partnership working to ensure children were having access to the services they required.

All staff across SBUHB had good knowledge and understanding of the DTR processes. CLA healthcare assessments were completed within the statutory time limitations and were comprehensive and contained all relevant information. GPs told us when undertaking assessments and attending to children's medical needs in Hillside, they would often have delays in medical information being available from the transferring authority, particularly for children coming from England. This meant key information could potentially be missed when providing medical treatment to children.

Areas for Development

The approach to CCE is as at an early stage of development. There is no multi-agency CCE protocol or agreed risk assessment. Whilst the police have a team dedicated to tackling Organised Crime and County Lines with a focus on vulnerability, there is no CCE team who 'own' the children, with the associated long-term intervention, safeguarding and disruption function. Some work is ongoing in this area, for example, YOS staff have access to partner agencies such as Better Futures, who provide advice on criminal exploitation in individual cases.

Although overall there was positive communication and healthy interaction recognised, there was evidence in two cases of professional differences about the implementation of safety planning at an operational level with no record these issues were resolved or escalated. This is an area the partnership needs to review to ensure timely care and support planning is in place.

Where a child presents with multiple areas of need, their case may be discussed at various meetings attended by different partners and this has potential for confusion. Partners need to ensure actions and planning is consistent and clear.

Some professionals said they did not receive invites to child protection meetings or received late notice. The local authority, however, was able to demonstrate the efforts it has made to ensure invites are consistently circulated to key professionals. This is an area that requires clarity and communication to ensure all relevant professionals can contribute in key conversations about safety for children.

We found further development is needed to embed the strengths based approach practiced and led by the local authority. For example, care and support plans were not routinely co-produced with children and families. Some children and families felt overwhelmed by lack of co-ordination of the many different professionals and support services offered. We did not see consistent evidence of the shared implementation and/or review of safety plans nor were safety plans shared with children and families.

We were told it is often difficult to obtain updates from the local authority on the outcomes of referrals made. The local authority and partners should consider reviewing and amending policies and procedures to ensure updates are provided to staff in a timely manner.

SPOC staff valued access to a weekly consultation meeting with a CAMHS worker, although this support had recently been reduced. This partnership supports SPOC and TAF workers in their intervention with families and builds a bridge with CAMHS. Children's services staff told us about the deficit in emotional wellbeing resources and waiting lists, for example for Barnardo's Blue Yonder project. This is compounded by the increased demand due to the pandemic and means children do not always get the help and support they need at the right time. The local authority has worked hard to develop and coordinate its own in house therapy service for CLA. Services include an in house therapy team and the MAPS team, both include psychologists and consultant social workers and work to support placement stability and permanence.

We found good examples of prompt referrals to CAMHS services. However, we were told by numerous GPs and others in the health partnership, that there were often long delays in obtaining a CAMHS assessment for children. This means there could be delays in children receiving timely interventions to address their mental health needs.

Across all schools there was a similar concern about a lengthy waiting list to access CAMHS support. Schools have increased their internal capacity to help support pupils through additional training and the introduction of different initiatives, however, specialist provision is still lacking. SBUHB must review its process for CAMHS assessment, to achieve timely care and support, in order to maintain child safety and minimise the risk of mental health crisis.

Some GPs reported if a child does not attend an arranged CAMHS appointment, a re-referral is required which results in further delays. SBUHB has a 'Was not Brought Protocol for Children, Young People and Adults where there are Safeguarding Concerns or have Care and Support Needs' in place. This highlights the procedures to follow up on non-attendance. Our review has identified issues with delayed CAMHS assessments, which may increase the risk of harm to a child. SBUHB should consider the process in place to audit non-attendance and where children have been referred back to the referrer, when 'Not Brought' for an appointment. In addition, any audit should consider whether a re-referral was required, and the effect this may have had on the child.

School Health Nurses were redeployed at the start of the pandemic and this has impacted on health professional representation at statutory safeguarding meetings. For example, for one file we noted there was no representative from SBUHB at the Initial Child Protection Conference. Whilst we were informed most School Health Nurses have now returned to their substantive posts, the health board should consider its strategy to ensure adequate staff resources are available to attend all relevant statutory safeguarding meetings in the future, or that appropriate measures are in place consistently, to mitigate the absence and any correspondence documented within the case records accordingly.

We observed and were informed of some examples where communication between health staff had not been effective nor timely. For example, when a child ceased to be looked after, this change in circumstances was not communicated to the GP or the School Health Nurse. We were informed this task is usually performed by an administrative support worker, but due to the CLA Team having no administrative support for over a year, this had not happened. SBUHB should ensure adequate resource is in place to support timely communications relating to CLA.

There are concerns schools do not always share important information when a vulnerable pupil transfers. This can be the case when a pupil transitions from a primary to a secondary school within the local authority, but also when a pupil moves mid-phase from one school to another, both from within the local authority and from a different authority.

Prevention

Strengths

The local authority works within a person-centred ethos that promotes children and young people being looked after within their own family wherever this is in the best interests of their well-being and safety. Where children are unable to live at home, sustaining contact with parents and siblings and wider family members is prioritised. We saw evidence of imaginative and innovative use of the services such as the Family Action Support Team (FAST) as well as third sector services such as Barnardo's and West Glamorgan Council

on Alcohol & Drug Abuse (WGCADA) in supporting a family focused approach. The local authority has embraced the view some families need ongoing engagement.

We found regular scrutiny and quality assurance processes across agencies. Themes and trends of concern, and individual learning were identified and fed back to practitioners and supervisors. We saw evidence of effective challenge across agencies, for example in police systems and children's services records, and appropriate communication and challenge between partners leading to effective decision making.

There were well established governance processes at police BCU and force level where issues surrounding children at risk were analysed. In addition, performance metrics were available through the business intelligence dashboard. There were also dip sampling assurance processes across several policing areas to analyse the qualitative response to concerns about children at risk. These include the Public Protection Unit (PPU), PSC and custody. This regular regime of oversight and governance provides the opportunity for senior officers to test the nature and quality of decision making and outcomes for children.

In advance of this inspection, in December 2020, SWP conducted an internal review of its response to child exploitation. This included reviews of investigations and missing persons cases and holding focus groups with police professionals. This review made eight recommendations. We were pleased to find during the inspection the recommendations made had been completed or work was underway to complete them. This has included holding three continuous professional development days attended by Inspectors and Sergeants with an intention to hold a further three for neighbourhood and response teams and PCSOs, focusing on the response to children at risk of exploitation. A new flowchart has also been created to make it easier to understand how NRM referrals should be dealt with from an intelligence, safeguarding and investigation perspective.

Quality assurance has a high profile across children and family services, with managers and staff engaged in this process. This is positive in contributing to the dissemination of learning across the service. Staff described a learning culture and were positive about the expansion of consultant social workers and the input they can provide to peer learning and reflective practice. The YOS conducts regular audits focusing on a specific aspect of practice. Recent audits have included girls in the system and serious violence. Regular reports on safeguarding are produced and discussed at the management board.

There was a shared early intervention and outcome focused ethos across the partnership. Children and families benefit from a well-developed early intervention offer, available through the SPOC and YOS. The multi-agency early intervention panel provided additional manager oversight of thresholds, constructive challenge and access to appropriate services and resources. It was noted some early intervention services had waiting lists due to reduced face-to-face activity during the pandemic

We saw good early intervention assessments by TAF that were co-produced with families. The complexity of some cases held by the TAF was recognised, inspectors were assured staff were confident in their safeguarding responsibilities and felt well supported. Evidence was seen that when needs or risks increased, cases were 'stepped up' from early intervention to children's social services and also stepped down as appropriate. The weekly transfer meetings involving principal officers and managers from across teams supported shared oversight and opportunities for professional discussion regarding progress of cases.

Although no formal mechanisms were identified, we were assured families referred to early intervention who did not then engage were not automatically closed to the service until SPOC had reviewed this to ensure the right response had been made regarding potential vulnerability. We considered this as an essential feedback loop to ensure threshold decisions are not based on simply a family's willingness to engage.

The local authority has relatively stable numbers for the CLA population. Senior managers and officers have a good understanding and knowledge of the profile of CLA. They are strongly committed to the preventative agenda, and to the safe reduction of the number of children who are looked after. It was evident from talking to staff the needs of the child were clearly acknowledged and accepted to be the priority in relation to permanency and contingency planning.

A quality assurance process was introduced in SBUHB in June 2021 to ensure consistency of the quality of CLA Statutory Health Assessments, in line with National Standards developed in 2020.

The local authority has worked hard to protect children placed by other authorities in their area and mitigate the shortfalls caused due to the lack of proper notification by some placing authorities. It was noted the consultant social worker in SPOC now had the role of chairing CSE strategy meetings for these children.

The YOS offers voluntary contact as a preventative and safeguarding measure. The emphasis is on diversion away from the criminal justice system and retaining an 'open door' when cases are closed so children can access support as and when required. The importance of diversion strategies was recognised by the YOS in providing constructive activities building on the child's interests and protective factors including education as a desistance factor. There was evidence of good risk awareness and a growing understanding of local patterns of drug distribution and how children are exploited within these networks.

There was a strong emphasis on trying to maintain children in school where they are safe. Partner agencies including the police and YOS worked with schools to address patterns of concern. One secondary school was taking part in a pilot initiative working with a PCSO in the evening to identify children in the community who were getting involved in anti-social behaviour.

The local authority has supported schools to follow safeguarding procedures swiftly and effectively using SPOC. In many cases, a chronology of school events was well documented to support the SPOC process. The education safeguarding officer has full access to all SPOC intelligence. This enables her to provide schools with additional information and support following a referral, including whether the threshold to proceed with an assessment was met. Schools found this support very effective. They had a process in place where they could raise concerns if they did not agree with an outcome from a SPOC referral or the advice offered. These concerns could be raised with senior managers and at the fortnightly safeguarding group where information is also shared, and emerging issues considered.

Prompt alerts from Operation Encompass provided schools with daily early notifications of young people involved in domestic abuse incidents involving the police. This early alert system effectively allows a school to strategically plan for the young person prior to their arrival at school at the start of the day. Schools can ensure the appropriate support is available and staff are aware and can identify when the young person may require additional time to talk about their worries. Schools reported this allowed the young person to feel safe at school where they can access a trusted member of staff if necessary. Schools also received PPNs daily, helping them to be proactive in providing necessary support.

Senior leaders in schools appeared to work diligently to avoid the unnecessary exclusion of vulnerable pupils as they understand the risks involved in this. One school has funded a successful off-site provision for pupils who need to be excluded from their class to help avoid a formal fixed-term exclusion. Where young people are at risk of permanent exclusion and are known to be at risk of exploitation, the social worker, school, and any other professional involved with the young person were required to look at packages of support to avoid the exclusion occurring. The Wellbeing team manager discussed school plans to reduce the exclusion figures with senior leaders in schools. Currently specific training for school governors on exclusions and the impact on young people is being developed and will be launched in the autumn term.

Each governing body had a dedicated governor with responsibility for safeguarding. The local authority provided regular ongoing safeguarding training to governors as part of the termly governor training programme. Safeguarding was a standing item on termly governing body meeting agendas. This included headline information on the number of cases referred to social services, number of physical interventions used, updates on safeguarding training provided to staff and any bullying and exclusion incidents.

The Education Welfare Service had effective systems in place to track pupil attendance. They worked proactively with schools to address attendance issues as early indicators of those pupils who are at risk of disengagement from education. The service worked with school practitioners to share information and contribute to planning meetings to target support for individual pupils and their families where attendance figures were a concern.

The local authority was highly committed to early intervention work to support children and young people. There was an increased emphasis on training and support for school staff on the impact of substance misuse and mental health issues that children and young people are enduring. Across the school based counselling service, staff emphasise the development of personal and social education programmes and support for teachers to deliver these programmes in school settings. A directory of local resources, seminars and services about healthy relationships was available for all schools. There was a wide range of support and advice to help ensure pupils understand about substance misuse, emotional and mental health issues and how to make important choices.

The RADS service operated in a number of community settings, including youth clubs and colleges throughout the county addressing the target age range of 14-25 years. RADS youth practitioners are highly trained members of staff that deal with a range of young people's issues including safe relationships, contraception, pregnancy, abortion, sexually transmitted infections, LGBTQ+ and many others. They also provided barrier contraception, pregnancy testing, advice and support to access secondary sexual health and other health

services. Additionally, the RADS service offered support, guidance and workshops to all secondary schools within the locality to support the Relationship and Sexuality Education (RSE) programme.

Areas for Development

It was evident practitioners and managers in children's services were committed to supporting children and families and respecting their wishes and feelings following a strength based approach to practice. However, we found in some cases workers were overly optimistic about engaging with children and families who had a history of dis-engagement. For these circumstances it is particularly important contingency planning is considered should engagement not go according to plan. Contingency planning in YOS was similarly not always sufficiently robust and could lack structure.

For one young person residing in a children's home there was limited evidence of multi-agency planning for the young person's imminent move on. The care and support plan required more detail, elements of which were not agreed across agencies with no indication this was being resolved.

Whilst the partnership is committed to early intervention, there are some waiting lists and demand outstrips supply. This means opportunities to address and mitigate risk at the earliest stage may be missed.

Next steps

The local authority should prepare a written statement of proposed action responding to the findings outlined in this letter. This should be a multi-agency response involving the National Probation Service, Youth Justice Service, Swansea Bay University Health Board and South Wales Police. The response should set out the actions for the partnership and, where appropriate, individual agencies.

The head of service for children's services should send the written statement of action to CIWLocalAuthority@gov.wales by 18 September. This statement will inform the lines of enquiry at any future joint or single agency activity by the inspectorates.

Yours sincerely,



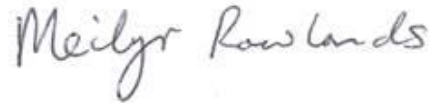
Gillian Baranski
Chief Inspector
Care Inspectorate Wales



Alun Jones
Interim Chief Executive
Healthcare Inspectorate Wales



Marc Baker
Director of Operations
HMI Probation



Meilyr Rowlands
Her Majesty's Chief Inspector
Estyn



Wendy Williams,
HM Inspector of Constabulary and HM Inspector of Fire & Rescue Services

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Ref. No.	Resp. Officer	Due Date	Actions	Evidence	Progress
1 Assessments					
1.1	Maria Selby, CYPS, Helen Sinclair, CYPS, Ali Davies, YJS (EIP)	Feb 22	Review all assessment documents to ensure they support: <ol style="list-style-type: none"> 1. A robust and balanced analysis of need and risk, including impact and context. 2. Capturing the voice of the child(ren), parents and family. 3. A strengths-based outcomes focused approach. 		
1.2	Maria Selby, CYPS Nune Aleksanyan, CYPS	Nov 21	Ensure assessments are shared with children and families in a timely manner		
2 Outcomes					
2.1	Maria Selby, CYPS	Feb 22	Develop an Outcomes focused Practice guide for Children's Services, including YJEIS.		
3 Voice of the Child/Family					
3.1	Helen Sinclair, CYPS Supt. Mark Brier, SWP PPPMG, WGSB	Jan 22	Work with Children and Families to consider how their voices are captured and recorded in cases of extra familial harm and develop a more consistent approach to the recording of views within referrals and occurrences		
3.2	Victoria Smith, Helen Sinclair, Gemma Hargest, CYPS	Nov 21	Develop a robust approach to promoting the use of independent advocacy with children and families, so they have a better understanding of its function and the added value the use of advocacy could bring		24/09/21: Meeting was held on the 21/09/21 with the Team Managers with NYAS Advocacy Provider to raise awareness of advocacy
4 Referrals/Reports/Communication					
4.1	Quality Practice Strategic Group, CYPS	Dec 21	Undertake a review of existing policies and procedures to ensure there is a robust process in place for providing a timely response to professionals on the decision of reports/referrals made into the Service.		
4.2	Supt. Mark Brier	Jan 2022	SWP to develop consistent and quality submissions by officers, ensuring mechanisms in place to promote a minimum standard of information required		
4.3	Supt. Mark Brier	Dec 2021	SWP to enhance review process within referral unit, by introducing standing operating procedure aligned with College of Policing Practice		
4.4	Supt. Mark Brier	Jan 2022	SWP to identify training required for staff within referral units, carry out a gap analysis and ensure development evidenced in supervision portfolios		

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4.5	Lead Nurse School Nursing Service & Looked After Children	October 2021 Complete	SBUHB to ensure adequate resources are in place to support timely communications relating to CLA		Completed All Admin post vacancies have been filled in the LAC Health team
5 Planning					
5.1	Maria Selby, CYPS, CYPS Ali Davies, YJS (EIP)	March 25 th 2022	Review all existing plans across Children Services and YJS (EIP) and consider purpose and function (Personal Outcomes, Co-Production, Contingency, Safety, Sharing etc.).		
5.2	Rachel Dixon, CYPS Joint Strategic Training Group, Safeguarding Board	Subject to the completion of 5.1	Work with partners to ensure a shared responsibility is adopted for the implementation and review of Plans		
5.3	Rachel Dixon, CYPS Joint Strategic Training Group, Safeguarding Board	Subject to the completion of 5.1	Develop a more co-ordinated approach with partners, to ensure professionals and children & families do not become overwhelmed in the delivery of multi-agency services		
5.4	QPSG, CYPS Amanda Turner, YJS	Bi-annual	Plan(s) to be evaluated and routinely dip sampled/audited. Standing agenda item bi-annual		
6 Meetings					
6.1	Ali Davies and YJS Management Group, YJS (EIP)	December 2021	YJS to review the number of meetings, briefings and action plans in place		14/09/21: The plans commented on were the annual Youth Justice Plan, the Gap Analysis and the Inspectorate Action Plan, (post disaggregation). The Post Inspection Action Plan can now be signed off and focus on the GAP Analysis Action Plan
6.2	Ali Davies, YJEIS	Completed October 2021	Request to the YJEIS Management Board to review the frequency and duration of the Board meetings from bi-monthly to quarterly		Responses will be collated 14/10/21, consensus received from the group for meetings to move to quarterly, to be ratified by Chair of the Board
6.3	WGSB	Jan 2022	Escalation of professional differences protocol to be reviewed with consideration of the informal challenge/pathway to be revised		
6.4	CYPS Team Managers, Quality Practice Strategic Group, CYPS Police	annually	Ensure the quality of Strategy Meetings: <ul style="list-style-type: none"> Minutes is more specific to the concerns and agreed actions are clearly identified recorded. Standing audit item Used more consistently to shape and adapt children's plans and improve the co-production of these with young people - Ensure appropriate membership 		
6.5	Lead Nurse School Nursing Service & Looked After Children/ Nurse Director Primary, Community & Therapy Service Group	Complete Oct 2021	Importance of attendance at Safeguarding meetings and the need to complete reports prior to Case Conference and share with families is included and will be reiterated in Safeguarding Training		Completed All School Nurses have returned from redeployment and have been reallocated their caseloads and made aware of their Safeguarding responsibilities

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Ref. No.	Resp. Officer	Due Date	Actions	Evidence	Progress
6.6	Lead Nurse School Nursing & Looked After Children/ Head of Nursing PCT Services Group	Complete Oct 2021	To ensure all Case Conferences are attended if staff were to be redeployed again, a team of SCPHN nurses would need to remain in the service to ensure the HB were able to fulfil attending all statutory Safeguarding meetings. SOP will formalise this.		Completed The School Nursing Service SOP has been updated to reflect the formal agreement that sufficient SCOHN nurses would remain in the service to cover all case conferences should another deployment happen.
6.7	Ali Davies and YJS (EIP) Management Group, YJS	Feb 2022	To review all YJEIS meetings, frequency, structure, ToR's, and ensure that meetings held are consistent and covering the correct agenda items and how meetings fit in existing pathways across the directorate and partnership		YJS (EIP) now only have risk review meetings and on high risk cases and any other case identified where it would be beneficial to do so
6.8	Deanne Martin, Probation	19/11/21	Conference invites and minutes are not always received timely by Probation Practitioners – Review the processes for invite and minute sharing between Children's Services and Probation		
7	Response to harm outside the family home/Safeguarding				
7.1	Chris Frey-Davies, CYPS Sam Jones, Education Safeguarding Rhian Lovell, Deputy PDU Head	Mar 22	Increase awareness of Contextual Safeguarding across the Partnership (CSP, Probation, YJS (EIP) Children and Adult Services, Health, Education).		December 21 presentation to be given to CSP Presentation to be agenda'd with VAWDASV Presentation to YJS (EIP) January 22 Briefing to all Swansea/NPT probation practitioners during staff development day Dec 21
7.2	Rachel Dixon, Training Joint Training Strategic Group, Safeguarding Board	Feb 22	Investment in relevant (joint) staff training (intra/extra) across the partnership.		
7.3	Chris Frey-Davies, CYPS YJS (EIP) Police Probation Barnardos/Better Futures	Nov 21 Mar 22 Oct 21	Develop a consistent and a shared framework for understanding of risk outside the family home: 1. Evaluate toolkit and thresholding document to support decision-makers to respond effectively and consistently to harm outside of the family home 2. Develop a multi-agency protocol for CCE cases with multi-agency partners 3. Agenda at Policy, Practice and Procedure Management Group. 4. SWP to Participate at strategic and tactical level in any subsequent working groups		Toolkit shared with Swansea CMET for consideration and adoption as a regional toolkit CFD part of county lines research advisory group (3 x docs) to develop national guidance 3 – complete – Safeguarding board has escalated the need for a consistent response to EFH with WG and All Wales Chairs
7.4	Chris Frey-Davies, CYPS	Dec 21	Revise existing MISPER pathway to ensure Return Home Interviews are fully utilised.		Guidance developed for foster carers, guidance being drafted for practitioners and parents
7.5	Chris Frey-Davies, CYPS	Subject to completion of 8.3	Further develop, refine and clarify existing pathways for responding to harm outside the family home.		
7.6	West Glamorgan Safeguarding Board Policy Group	Mar 22	Develop a practice guide on the use of language and labelling across the partnership.		

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Ref. No.	Resp. Officer	Due Date	Actions	Evidence	Progress
7.7	Supt. Mark Brier, SWP Probation	Completed	Review and develop current use of disruption tactics and perpetrator profiles. SWP to ensure distinct disruption strategy is recorded and maintained in all cases to support Safeguarding and Investigative strategies		Completed - Home Office Toolkit in use, Joint Intelligence Programme (JIP) embedded in NPT and Swansea. The JIP, alongside other structures/processes such as MAPPA and IOM, supports Probation, SWP and Prisons to work jointly with a focus on disrupting organised crime through intelligence gathering, information sharing and multi agency working across the partnership.
7.8	Ian Rees, CYPS PPPG, WGSB	Feb 22	Continue to support Gypsy, Roma and Traveller communities through the GRT Forum. This work should be extended to other marginalised groups across the LA (BAME, LGBTQIA+) Equalities and Diversity (ED) to be a standing agenda item for all local and partnership meetings i.e. PPPMG, Corporate Safeguarding, etc		
7.9	Nune Aleksanyan CYPS	Feb 22	Further strengthen the front door MA arrangements (CAMHS, Probation etc).		
7.10	Chris Frey-Davies, CYPS	Dec 21	Ensure children placed by other authorities across the LA are protected.		Policy for responding to concerns stemming from independent care homes is currently in draft and will be presented to All Wales Safeguarding Leads in Nov 21. Responding to independent care homes escalated to the board and CIW and will be further escalated to All Wales Chairs
7.11	Sam Jones, Education Safeguarding	31/10/21	In order to address concerns that schools do not always share important information when a vulnerable pupil transfers: <ul style="list-style-type: none"> Education Leisure and Lifelong Learning Directorate have a policy for the retention and transfer of records. Policy to be reviewed and then recirculated with a reminder of the importance of transferring records to ensure continuity for children. Transfer of records can be added to DSP training 		Discussed at Safeguarding Education Group on 6 th October 2021 about the need to transfer records between schools
7.12	Ali Davies, YJS (EIP) Amanda Turner, YJS	Nov 26 th 2021	Embed expertise about exploitation and the contextual safeguarding concept in to practice and ensure there is full understanding across professional groups – To Embed the Community Risk Profiling Meetings and Triangulation Meetings into YJEIS practice		14/09/21: These meetings have begun, progress will be monitored
7.13	Ali Davies, YJEIS Amanda Turner, YJS	30/09/21 Completed	Community Risk Profiling Meetings must include all relevant agencies, membership and remit of the group to be reviewed		Reviewed and confirm the relevant agencies are included.
7.14	Deanne Martin, Probation	27/10/21	Probation Practitioners need greater awareness of NRM and referral routes via First Responders - Further First Responders Training identified for nominated Probation Staff on 27/10/21		Training scheduled for 27/10/21
7.15	Deanne Martin, Probation	13/12/21	Probation Practitioners need greater awareness of NRM and referral routes via First Responders – Probation Practitioner Briefing		

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Ref. No.	Resp. Officer	Due Date	Actions	Evidence	Progress
7.16	Supt. Mark Brier	Mar 2022	SWP to have identifiable resource to own disruption strategies to CCE		
7.17	Interim Assistant Director of Nursing (Corporate)/Head of Nursing (Safeguarding)	March 2022	Prompt access to Safeguarding training will be balanced against the current challenges with staffing, and in line with the COVID recovery plans, the Health Board will work towards prioritising staff access and study time to complete this training. A paper presenting proposals to achieve Level 2 Safeguarding training compliance across all staff will be prepared for discussion and agreement at the Management Board. This will consider potential actions, responsibilities and timescales for achievement and mechanisms to monitor progress.		
7.18	Corporate Safeguarding Team, SBUHB	Dec 2021	Level 3 Exploitation Training Study Day to be reintroduced		In Progress Level 3 Exploitation training days arranged across the HB from November 2021. Flyer circulated to all HB staff and training advertised on Intranet. Bulletin to be circulated to staff to highlight the recommencement of this training
7.19	Head of Nursing Safeguarding	Sept 2021	All Wales Safeguarding Best Practice Supervision Guidance to be circulated to all relevant staff groups		Completed All Wales Safeguarding Best Practice Supervision Guidance circulated September 2021
7.20	Head of Nursing Safeguarding/Extended Safeguarding Team/Service Group Leads	Sept 2021	Assurance to be sought from Extended Safeguarding Team/ Service Group Leads that staff are accessing Safeguarding Supervision as per Wales Safeguarding Best Practice Supervision Guidance		Completed Assurance received from lead managers School Nursing, LAC Health, Health Visiting, Emergency Department (ED) and Minor Injuries Unit (MIU) that staff have access to and engage in regular Safeguarding Supervision
7.21	Corporate Safeguarding Team/Extended Safeguarding Team	March 2022	Safeguarding Supervision training to be arranged for SBUHB staff in Corporate and Extended Safeguarding Team		In Progress National Safeguarding Team (NST) contacted to request Safeguarding Supervision training. NST advised they no longer facilitate this training NST forwarded Safeguarding Supervision Training package Meeting held October 7th with Heads of Safeguarding in Cwm Taf Morgannwg UHB and Cardiff & Vale UHB to develop Safeguarding Supervision Training day
7.22	Corporate Safeguarding Team/ Lead Nurse ISH	Dec 21	Safeguarding Supervision dates to be arranged for Integrated Sexual Health (ISH) staff and Safeguarding Supervision promoted in ISH mandatory Study Day 08.10.21		In Progress
7.23	Corporate Safeguarding Team/Extended Safeguarding Team	May 2022	Annual Audit of Safeguarding Supervision to continue and findings reported to Safeguarding Committee		In Progress Annual Safeguarding Supervision Audit completed in 2021 and reported to Safeguarding Committee 14th August 2021 Annual Safeguarding Audit to be completed in 2022 and reported to Safeguarding Committee

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8 Multi-Agency Public Protection Arrangements (MAPPA)					
Ref. No.	Resp. Officer	Due Date	Actions	Evidence	Progress
8.1	SMB	Dec 21	<p>Clarifying the MAPPA role and how the process is used in cases of Criminal Exploitation. To be taken to SMB in November to consider:</p> <ul style="list-style-type: none"> All partners are familiar with process Suitability of referrals and thresholds MAPPA awareness briefing to partners 		
9 Services					
9.1	Ali Davies, YJEIS Amanda Turner, YJS (EIP)	Oct 21	Some early intervention services had waiting lists due to reduced face-to-face activity during the pandemic, this to be monitored and reduction in early intervention waiting lists to be evidenced		
9.2	SBUHB Assistant Director of Strategy & Partnerships	Dec 21	The (Child & Adolescent Mental Health Service) CAMHS is provided by Cwm Taf Morgannwg (CTM) UHB, as part of a Service Level Agreement. The assessment process and audit of non-attendance will be placed on the agenda for the SBUHB / CTMUHB CAMHS Commissioning Meeting on 27th October to agree this audit being carried out by end of December 2021.		In Progress SBUHB and CTMUHB have a regular monitoring processes in place regarding a range of performance factors, including non-attendance for appointments. This information shows that non-attendance has reduced over the past year, thought to be linked to use of a mixture of face-to-face and online modalities for appointments. Further discussion with CTM UHB to be held in October.
9.3	Lead Nurse Sexual Health	Dec 21	All Sexual Health staff to have timely access to Safeguarding alerts (including Child Protection Registration information)		In Progress All Sexual Health Staff have access to Patient Administration System (PAS) which contain Safeguarding alerts Lead Nurse Sexual Health to ensure all staff have awareness of access to PAS Safeguarding Alerts on PAS included in staff annual mandatory Study Day 8.10.21
10 Improve initial response to missing children reports					
10.1	DI Bartholomew, Strategic Public Protection Department (SPDD)	Mar 2022	Further training to be delivered – Including specific reference to College of Police guidance on Frequent or Planned Absences.		
10.2	Supt. Mark Brier, SWP	Mar 2022	Monitoring and compliance – Supervisory review of all PPNs and OELS to ensure robust initial assessment and additional specialist review to ensure risks appreciated with clear escalation process in the event they are not.		
10.3	DI Bartholomew, Strategic Public Protection Department (SPDD)	Mar 2022	NAIRA Team to be trained on Contextual Safeguarding and research process enhanced and agreed to include review of personal dossiers and nominal research reports		



JICPA Joint Action Plan

14th October 2021 version 1

Colour key:
RED: Not started
AMBER: Started and ongoing
GREEN: Completed

This action plan has been agreed across the partnership following receipt of the final JICPA report dated 19th September 2021. Whilst agreed in principle by the partnership the action plan will be subject to individual organisational governance structures/scrutiny oversight and therefore will be updated accordingly. This plan will be subject to partnership review through the Quality Practice Management Group of the Safeguarding Board on a quarterly basis. The plan will also be the subject to additional scrutiny through other partnership meetings for example, YJS (EIP) Management Board, NPT Corporate Safeguarding, Health Safeguarding Scrutiny Committee, SMB, etc.

Mae'r dudalen hon yn fwiadol wag



Cyngor Castell-nedd Port Talbot
Neath Port Talbot Council

NEATH PORT TALBOT COUNTY BOROUGH COUNCIL Social Care, Health & Well-Being Cabinet Board

9th December 2021

**Report of the Heads of Children & Adult Services – K.Warren &
A.Thomas**

Matter for Monitoring

Wards Affected All

CHILDREN & YOUNG PEOPLE and ADULT SERVICES – 2nd QUARTER (April 2021 – September 2021) PERFORMANCE REPORT

Purpose of the Report

1. The purpose of this report is to provide Members with Performance Information and Complaints & Compliments Data for both Children & Young People Services and Adult Services for the 2nd Quarter Period (April 2021 – September 2021). This will enable the Social Care, Health & Well Being Cabinet Board and Scrutiny Members to discharge their functions in relation to performance management.

Executive Summary

2. A new set of Statutory Welsh Government Performance Metrics was introduced for Social Services during 2020-21 and although they are not all reported on a quarterly basis, they will be fully accounted for in the end of year performance report. In addition, this report also contains information relating to the number of

Complaints and Compliments received by the Directorate during the 2nd Quarter Period (April 2021 – September 2021), as well as the Children & Young Peoples Services and Adult Services High Level Measures.

Background

3. Failure to produce a compliant performance monitoring report within timescale could lead to non-compliance within our Constitution and hinder the full and transparent scrutiny of performance across the Directorate. This report enables Members to monitor and challenge performance across Children & Young People Services and Adult Services, whilst taking into account our reporting obligations to Welsh Government in terms of the Statutory Performance Metrics.

Financial Impacts

4. No Implications

Integrated Impact Assessment

5. There is no requirement to undertake an Integrated Impact Assessment as this report is for monitoring / information purposes.

Valleys Communities Impacts

6. No Implications.

Workforce Impacts

7. No implications.

Legal Impacts

8. No implications

Risk Management Impacts

9. There is little or no risks associated with the information contained in this report.

Crime and Disorder Impacts

10. Section 17 of the Crime and Disorder Act 1998 places a duty on the Council in the exercise of its functions to have “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:

- a) Crime and disorder in its area (including anti-social and other behaviour adversely affecting the local environment); and
- b) The misuse of drugs, alcohol and other substances in its area; and
- c) Re-offending the area”

11. There is no impact under the Section 17 of the Crime and Disorder Act 1998 through the information contained in this report.

Counter Terrorism Impacts

12. The information contained in this report is likely to have no impact on the duty to prevent people from being drawn into terrorism.

Violence Against Women, Domestic Abuse and Sexual Violence Impacts

13. Section 2(1) of the Violence Against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015 introduced a general duty where a person exercising relevant functions must have regard (along with all other relevant matters) to the need to remove or minimise any factors which —

(a) increase the risk of violence against women and girls, or

(b) exacerbate the impact of such violence on victims.

14. The information contained in this report is likely to have no impact on the above duty.

Consultation

15. There is no requirement for external consultation on this item

Recommendations

16. The report is for monitoring

Reasons for Proposed Decision

17. Not applicable.

Implementation of Decision

18. No decision to be made. For information only.

Appendices

19. Appendices listed as follows: -

- a. **Appendix 1** – CYPS 2nd Quarter Performance Report (April 2021 – September 2021).
- b. **Appendix 2** – Adult Services 2nd Quarter Performance Report (April 2021 – September 2021).
- c. **Appendix 3** – CYPS 2nd Quarter Complaints and Compliments Report (April 2021 – September 2021).

- d. **Appendix 4** – Adult Services 2nd Quarter Complaints and Compliments Report (April 2021 – September 2021).
- e. **Appendix 5** – Adult and CYPS Services High Level Measures.
- f. **Appendix 6** – CYPS 2nd Quarter Audit Overview Report (July 2021 – September 2021)

List of Background Papers

20. None.

Officer Contacts

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Performance Indicators







Neath Port Talbot Council

Appendix 1 - Children & Young People's Services – Quarterly Performance Report - Quarter 2 (1st April - 30th September) - 2021/22



Print Date: 17-Nov-2021

How will we know we are making a difference (01/04/2021 to 30/09/2021)?

PI Title	Actual 19/20	Actual 20/21	Actual 21/22	Target 21/22	Perf. RAG
Organisation					
CP/011 - PAM/028 - Measure 24 - Percentage of child assessments completed on time	97.11	97.36	98.11	94.00	 Green
1301 out of 1326 in Quarter 2 2021/22 compared to 1293 out of 1328 in the same period 2020/21. All Wales Average 88.9%. This remains a priority for Children's Services and Senior Officers are still working closely with Team Managers to ensure assessments are completed in a timely manner. An audit programme is in place, each quarter for those assessments that are not completed on time. Although the figure has increased since the same period last year, and we are significantly higher than the All Wales Average, Children's Services strive to reach 100%.					
PI/239 - % of children supported to live with their family.	64.11	66.86	67.71	64.70	 Green
585 out of 864 in Qtr2. 2021/22 is an increase on the previous performance Qtr. 2 2020/21 of 589 out of 881. This figure is fractionally lower than the All Wales average of 68.4%. Children's services adopt a whole system approach and use outcomes focused practice to ensure families receive the right support and the right time to provide the best opportunity of remaining together as a family where it is safe to do so.					
PI/241 - % of re-registrations of children on the local authority child protection register	13.46	10.71	11.90	9.40	 Red
5 out of 42 in Qtr. 2 2021/22 compared to 9 out of 84 in the same period 2020/21. Despite a percentage point increase re-registrations remain low and down on the Qtr. 2 2020/21. (-4).					
PI/527 - Percentage of Child Protection Visits undertaken within 2 weeks			87.50	87.70	 Amber
1190 out of 1360 in Qtr.2 2021/22. The CP visits falling out of compliance for this period is 170, compared to 64 out of compliance for the same period last year Qtr. 2 (+106) or +90 on Qtr. 1 of this year. This issue has been raised with the respective area team POs and HOS and the Team Managers have been reminded of the expectations in respect of CP visits.					
PI/528 - Percentage of Statutory Visits to Looked After Children that took place in accordance with regulations			93.20	87.70	 Green
1207 out of 1295 in Quarter 2 in 2021/22 This is a new performance indicator therefore we have no comparative data. This continues to be a priority for Childrens Services and Principal officers will be working closely with team managers and staff members to ensure that visits are completed in timescale and are entered onto the system in a timely manner. The Local Authority recognises the impact of the COVID-19 restrictions that were in place at the time and aims to improve this over the coming months.					
PI/529 - Percentage of 'New' Comprehensive Assessments completed during the year where there is evidence that the child has been seen			86.18	68.30	 Green

PI Title	Actual 19/20	Actual 20/21	Actual 21/22	Target 21/22	Perf. RAG
586 out of 680 in Qtr.2 2021/22. This is a new performance indicator therefore we have no comparative data. This measure is a priority to Childrens Services and going forward we endeavour to see all children as part of a new assessment. This figure has increased since the 1st Qtr. 2021/22, as COVID measures have relaxed.					
PI/530 - CH/001 – Number of ‘new’ contacts received by statutory social services during the year			6626.00		
6626 in Qtr. 2 2021/22. This is a new performance metric therefore we have no comparative data. We have seen a significant increase in Contact rates since the Lockdown restrictions were lifted in March 2021. The increase was expected and the data reflects that.					
PI/531 - CH/003 – Number of ‘new’ contacts received where a decision was made by the end of the next working day			6626.00		
6626 in Qtr. 2 2021/22. This is a new performance metric therefore we have no comparative data. As a working model, we ensure that all contacts are sighted and acted upon within 24 hours and this is reflected in the data.					
PI/532 - CH/021 – The number of Strategy Meetings held during the year that progressed to Section 47 Enquiries			139.00		
This is a new performance metric therefore we have no comparative data. Of the 543 Strategy meetings held during this Qtr. Only 139 led to S47 enquiries (26%). This is consistent with Qtr. 1, which saw 74% strategy meetings progressing other than S47 enquiries. This is a figure that is regularly monitored and subject to fluctuations.					
PI/533 - CH/022 – The number of Section 47 Enquiries that progressed to Initial Child Protection Conference			44.00		
This is a new performance metric therefore we have no comparative data. Of the 139 S47 enquiries undertaken during this period, 107 substantiated risk. With the remainder (32) finding no risk. The conversion rate sits at 77%, a two percentage point increase on the last Qtr. which is consistent.					
PI/534 - CH/025 – The number of Child Protection Conferences held within timescale			35.00		
This is a new performance metric therefore we have no comparative data. Qtr. 2 saw an increase (+5) in conferences not being held in timescales. Those conferences that fell over timescales had valid reasons: parent/child unavailability etc.					
PI/535 - CH/033 – The number of children reported during the year where Child Exploitation was factor (includes, Child Sexual Exploitation, Child Criminal Exploitation and Child Trafficking)			38.00		
This is a new performance metric therefore we have no comparative data. This number remains consistent, with a noted increase in strategy meetings being held for Criminal Exploitation.					
PI/538 - CA/012 – The number of contacts by Young Carers received by statutory social services during the year where advice or assistance was provided			9.00		
9 in Qtr. 2 2021/22. This is a new performance metric therefore we have no comparative data. This performance metric is subject to fluctuation as referrals can also be made direct to the Young Carers service. Children’s Services work closely with the Young Carers service to ensure that children are identified.					

PI Title	Actual 19/20	Actual 20/21	Actual 21/22	Target 21/22	Perf. RAG
PI/539 - CA/014 – The total number of young carers needs assessments undertaken during the year			20.00		
<p>20 in Qtr. 2 2021/22. This is a new performance metric therefore we have no comparative data. As a service, we expected this number to increase after the COVID-19 Lockdown restrictions were eased. Although contacts have been low during the quarter, we would have identified the needs of young carers through our day to day work and assessed them accordingly.</p>					

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Performance Indicators




Neath Port Talbot Council

Appendix 2 - Adult Services - Key Performance Indicators - Quarter 2 (1st April - 30th September) - 2021/22



Print Date: 17-Nov-2021

How will we know we are making a difference (01/04/2021 to 30/09/2021)?

PI Title	Actual 19/20	Actual 20/21	Actual 21/22	Target 21/22	Perf. RAG
Organisation					
CP/031 - PAM/012 - Percentage of households successfully prevented from becoming homeless	51.19	72.80	65.61	60.00	 Green
103 of 157 for quarter 2 2021/22. Due to a funding increase the Housing Options service has been able to increase its staffing capacity to be able to manage the increased demand seen following the pandemic. This increased capacity also applies to prevention work and being able to start prevention work at an earlier stage.					
CP/032 - PAM/015 - Average calendar days taken to deliver a Disabled Facilities Grant	185.38	317.00	344.89	270.00	 Red
73 DFG's/25,177 days for quarter 2 2021/22. The delivery of Disabled Facilities Grants continues to be disrupted by the Covid-19 pandemic. The figures reflect the long periods of inactivity that resulted from the lockdowns. This coupled with a shortage of Contractors and disruptions in the supply chains for materials continue to have a bearing on the delivery of the adaptations. The high levels of infection in the community is also detrimental to the delivery of the adaptations.					
PI/517 - PAM/025 - Measure 19 - Rate of people kept in hospital while waiting for social care per 1,000 population aged 75+	4.41			1.80	 NA
Unable to calculate this Performance Indicator as no data has been provided by Welsh Government since March 2020 due to Covid-19.					
PI/521 - AD/004 The number of new assessments completed for adults during the year			483.00		
(New PI from 1/4/21) The teams are continuing to undertake assessments for adults in need of care and support. There has been an increase in number since the last quarter, however it has not been possible to draw a comparison to previous years, as this is a new metric.					
PI/521a - AD/005a The number of new assessments completed for adults during the year where needs were only able to be met with a care and support plan			416.00		
(New PI from 01/04/21) The majority of adults who received an assessment, continue to be eligible for a care and support plan from the Local Authority. There has been an increase in number since the last quarter, however it has not been possible to draw a comparison to previous years as this is a new metric.					
PI/521b - AD/005b The number of new assessments completed for adults during the year where needs were able to be met by any other means			57.00		
(New PI from 01/04/21) For a relatively small number of adults who were assessed, alternative ways of meeting their needs were identified. This was higher number in this quarter than in quarter one, however it has not been possible to draw a comparison to previous years as this is a new metric.					

PI Title	Actual 19/20	Actual 20/21	Actual 21/22	Target 21/22	Perf. RAG
PI/521c - AD/005c The number of new assessments completed for adults during the year where there were no eligible needs to be met			9.00		
(New PI from 01/04/21) Only a small number of people who had an assessment were identified as having no eligible needs.					
PI/522 - AD/010 The total number of packages of reablement completed during the year			108.00		
(New PI from 01/04/21) Capacity within the external domiciliary care market continues to affect flow out of the service.					
PI/522a - AD/011a The total number of packages of reablement completed during the year which reduced the need for support			20.00		
(New PI from 01/04/21) There are 20 clients who have completed the reablement service needing a reduced level of care and support.					
PI/522b - AD/011b The total number of packages of reablement completed during the year which maintained the need for the same level of support			9.00		
(New PI from 01/04/21) Of the 108 clients who have completed reablement, only 9 have continued with the same level of care and support they received pre-reablement input.					
PI/522c - AD/011c The total number of packages of reablement completed during the year which mitigated the need for support			74.00		
(New PI from 01/04/21) There are 74 clients who have successfully completed their reablement packages and no longer require any further care or support.					
PI/523 - AD/020 The total number of reports of an adult suspected of being at risk received during the year			715.00		
(New PI from 01/04/21) Whilst it was anticipated that we might have seen a reduction in the number of reports over the quarter this trend in increased reports is currently being felt across the region and by other LAs and is likely a symptom of the other pressures currently being experienced across Adult Social Care currently.					
PI/524 - AD/023 The total number of reports of an adult suspect of being at risk where it was necessary for enquiries to be made			150.00		
(New PI from 01/04/21) The conversion rate from Report to enquiries remains constant albeit low at 21%.					
PI/525 - AD/024 The total number of AAR (Adult at Risk) enquiries completed within 7 days from the receipt of the reported alleged abuse			104.00		
(New PI from 01/04/21) Only 69% of enquiries undertaken during this quarter were completed within 7 days. This is due to the complexity of some of those cases, coupled with the additional demands placed on the team and the team having two vacant posts.					
PI/526 - CA/004 The total number of carers needs assessments for adults undertaken during the year			38.00		

PI Title	Actual 19/20	Actual 20/21	Actual 21/22	Target 21/22	Perf. RAG
(New PI from 01/04/21) The Carer's service continue to deliver a support service and whereas the increase in the number of carer's assessments taken up is relatively low in this quarter, all identified carer's are provided with information and advice to help them in their caring role.					

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Appendix 3 -Children & Young People Services - Compliments and Complaints - Quarter 2 (1st April - 30th September) - 2021/22



Print Date: 17-Nov-2021



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Performance Indicators

Neath Port Talbot Council

Appendix 4 - Social Services, Health & Housing (excluding CYPS) - Compliments and Complaints -
Quarter 2 (1st April - 30th September) - 2021/22



Print Date: 17-Nov-2021

How will we know we are making a difference (01/04/2021 to 30/09/2021)?

PI Title	Actual 19/20	Actual 20/21	Actual 21/22	Target 21/22	Perf. RAG
Organisation					
PI/264 - Social Services, Health and Housing (excluding CYPS) - % of complaints at Stage 1 that were upheld/partially upheld	81.82	75.00	25.00		
(3 of 12)					
2nd Quarter (1st July – 30th September)					
8 complaints were received during this quarter; of which, 1 complaint was upheld and 1 partially upheld. Breakdown as follows:-					
<p>1. Upheld – Dissatisfaction with service communication and assessment outcome; a Team Manager undertook an investigation and reviewed the worker’s communication practice.</p> <p>2. Partially upheld – This complaint was twofold, and related to an historic safeguarding issue and also the conduct and practice of a worker. It was noted that the historic issue had been addressed previously and responded to appropriately. A Team Manager investigated the second element of the complaint and acknowledged the distress caused and offered an apology to the complainant.</p>					
Cumulative (1st April 2021 to 30th September 2021)					
During the first 6 months of 2021/22, 12 complaints have been received which compares with 4 complaints received for the same period in 2020/21.					
PI/265 - Social Services, Health and Housing (excluding CYPS) - % of complaints at Stage 2 that were upheld/partially upheld	100.00		0.00		
There was 1 complaint at Stage 2 during the second quarter of 2021/22, which was not upheld. There continues to be a strong emphasis on a speedier resolution at ‘local’ and ‘Stage 1’ levels.					
PI/266 -Social Services, Health and Housing (excluding CYPS) - % of complaints dealt with by the Public Services Ombudsman that were upheld					
There were no ombudsman investigations during this period.					
PI/267 - Social Services, Health and Housing (excluding CYPS) - Number of compliments received from the public	16.00	50.00	16.00		
2nd Quarter (1st July – 30th September) 9 compliments were received during this quarter; the total number received during the first 6 months of 2021/22 is 16; which compares to 50 compliments received for the first six months in 2020/21.					
Compliments received include personal praise of staff and thanks for service/support.					



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Appendix 5

Children & Young People and

Adult Services High Level Measures

Contents

Page 3 - 4: High Level Measure 1 (Adult Services) - The Number of Social Worker Vacancies (includes number of starters/leavers/agency staff/long-term sickness), Disciplinarys and Grievances across the Service

Page 5: High Level Measure 2 (Adult Services) - Summary of Agency Staff and Vacancies across the Service

Page 6: High Level Measure 3 (Adult Services) - Percentage of Supervisions Completed within Timescale

Page 7: High Level Measure 4 (Adult Services) - Service Users Awaiting a Social Care Assessment/Re-Assessment

Page 8 – 10: High Level Measure 5 (Children & Young People Services) – Staff Supervision Rates

Page 11: High Level Measure 6 (Children & Young People Services) – Average Number of Cases held by Qualified Workers across the Service.

Page 12 -13: High Level Measure 7 (Children & Young People Services) – The Number of Social Worker Vacancies (includes number of starters/leavers/agency staff/long-term sickness), Disciplinarys and Grievances across the Service.

Page 14: High Level Measure 8 (Children & Young People Services) - Thematic Report on the findings of Case File Audits (reported quarterly)

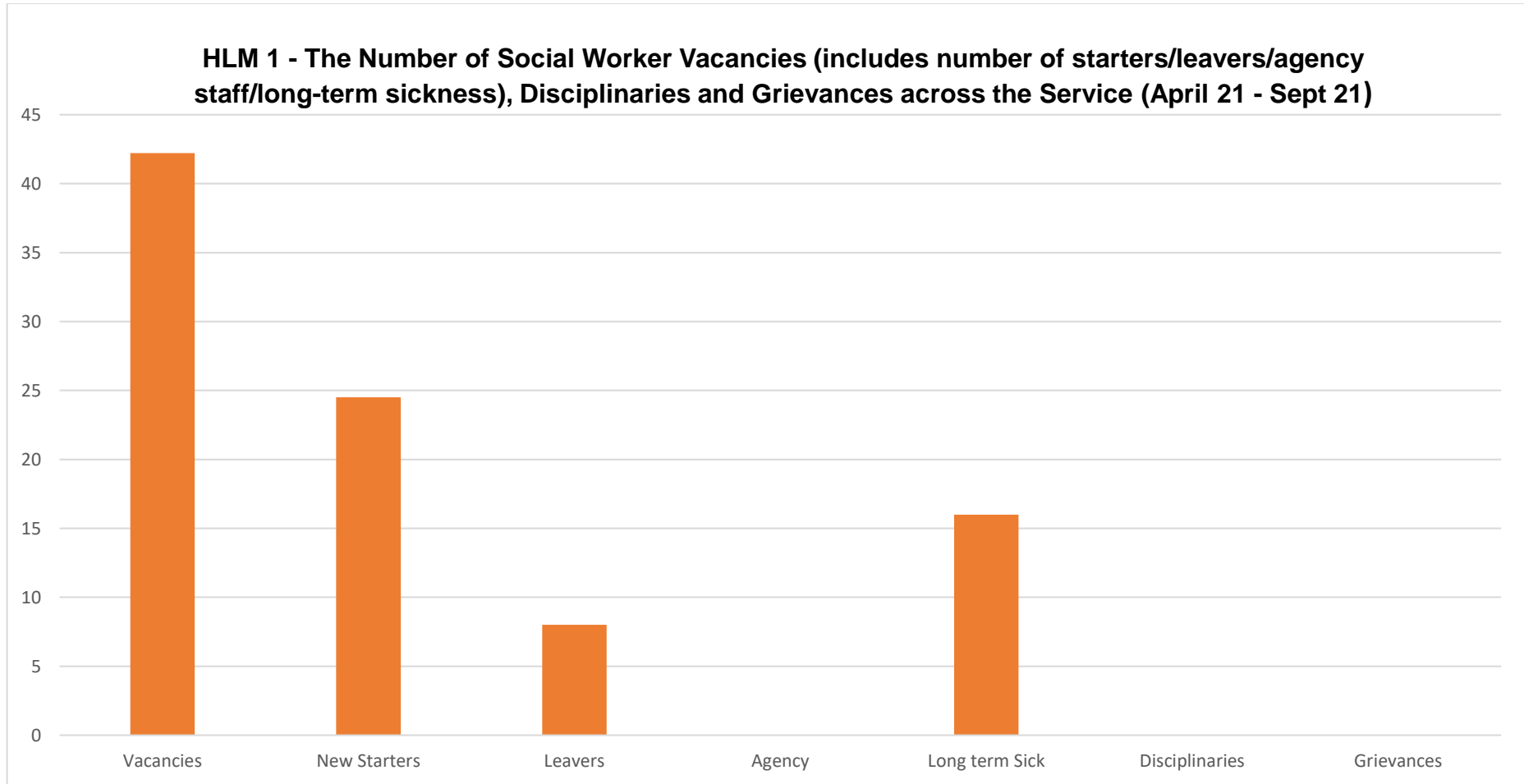
Page 15 – 17: High Level Measure 9 (Children & Young People Services) – Number of Looked After Children (Quarterly)

Page 18: High Level Measure 10 (Children & Young People Services) – Looked after Children & Child Protection Admissions and Discharges.

Page 19 – 20: High Level Measure 11 (Children & Young People Services) – Personal Outcomes

Page 21 – 23: High Level Measure 12 (Children & Young People Services) – Participation & Engagement (Voice of the Child)

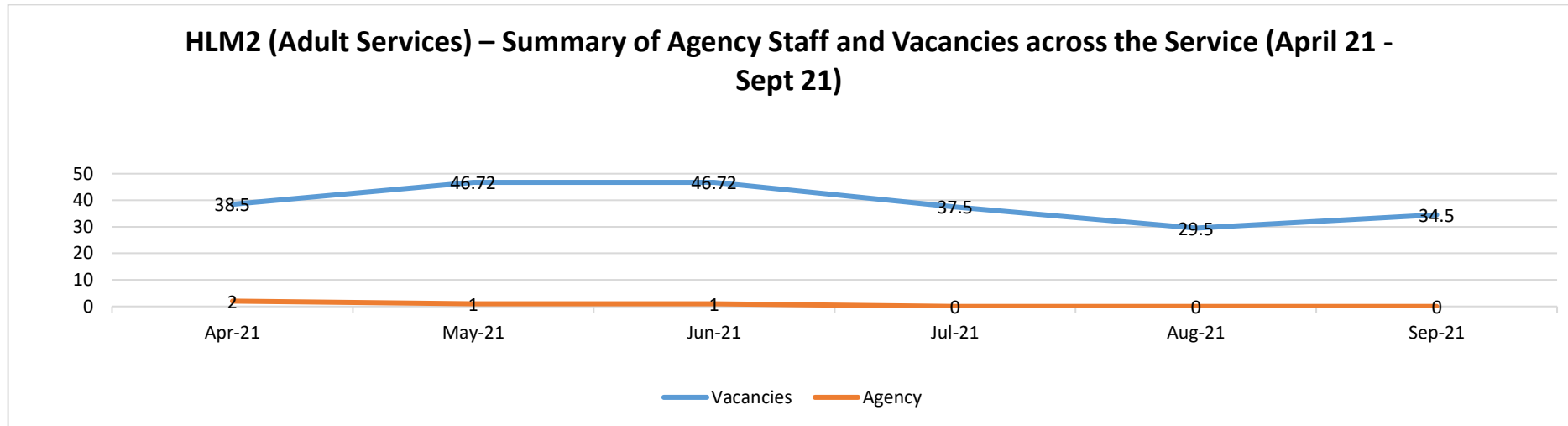
- **High Level Measure 1 (Adult Services) – The Number of Social Worker Vacancies (includes number of starters/leavers/agency staff/long-term sickness), Disciplinary Investigations and Grievances across the Service**



	Team Manager	Deputy Team Manager	Consultant Social Worker	Community Social Worker	Community Wellbeing Officer	Safeguarding Coordinator/Best Interest Assessor	Occupational Therapists/OT Assistant	CWT Support Worker	Local Area Coordinators	Total
Vacancies	1	0	5	11	0	2	1.5	13.72	8	42.22
New Starters	1	0	1	5	0	1	5.5	3	8	24.5
Leavers	0	0	0	4	0	0	0	4	0	8
Agency	0	0	0	0	0	0	0	0	0	0
Long term Sick	0	0	0	0	1	0	1	14	0	16
Disciplinarys	0	0	0	0	0	0	0	0	0	0
Grievances	0	0	0	0	0	0	0	0	0	0
Total of Posts	7	6	6	59	26	4	23	26	13	170

NB. For the purposes of the report “vacancies” have been identified as being posts that are vacant that are actively being recruited for. Not posts that remain vacant that are being held for savings or where the money is being used to fund posts elsewhere. Sickness levels have remained in their increased levels within the service area, all of these cases are being managed in line with the Maximising Attendance Procedure. There is no predominant reason for long term absence within Adult Services at this time however, there is an increased number of employees absent due to “Pre- planned operation” and “Personal Stress/Anxiety”.

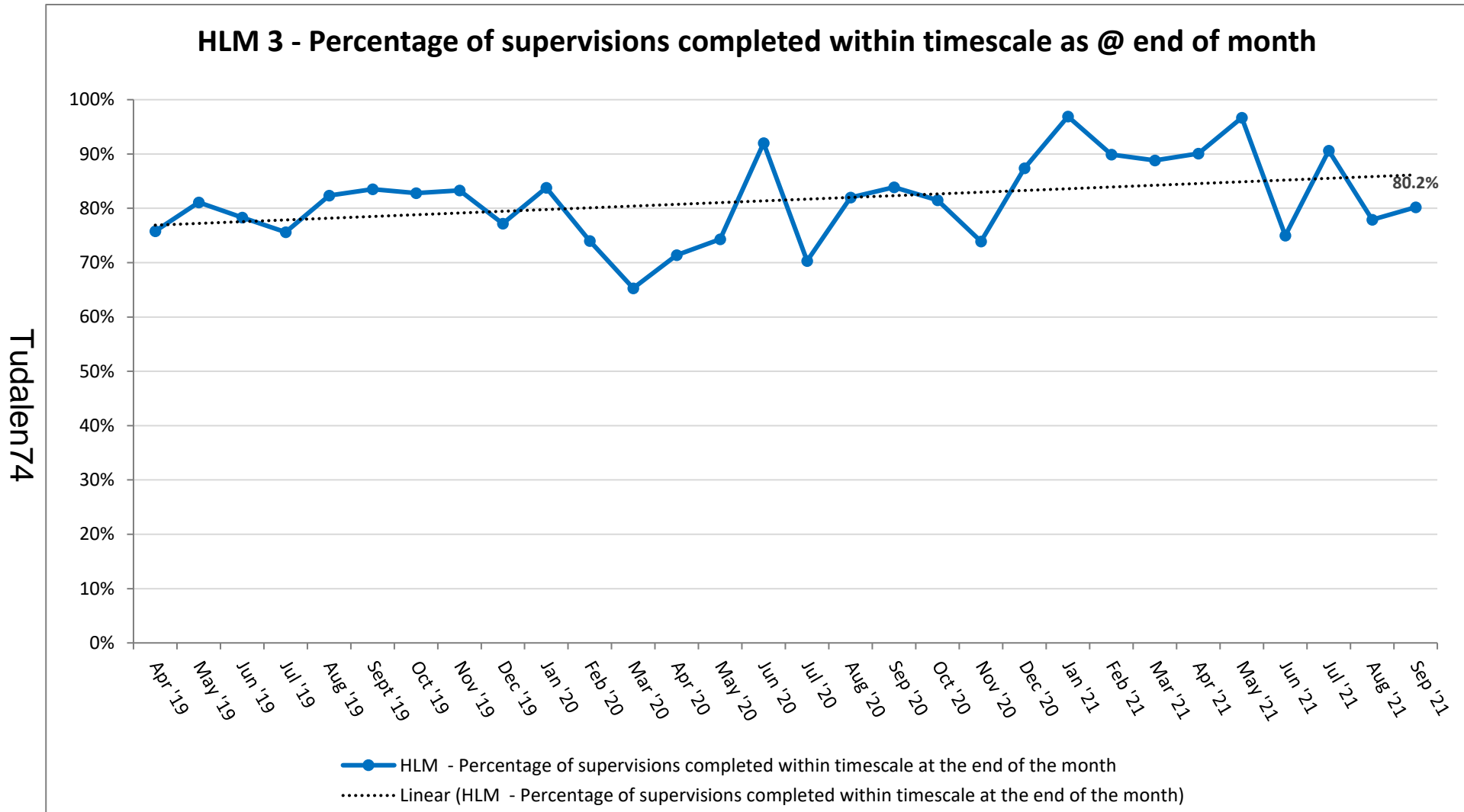
- **High Level Measure 2 (Adult Services) – Summary of Agency Staff and Vacancies across the Service (April 21 – June 21)**



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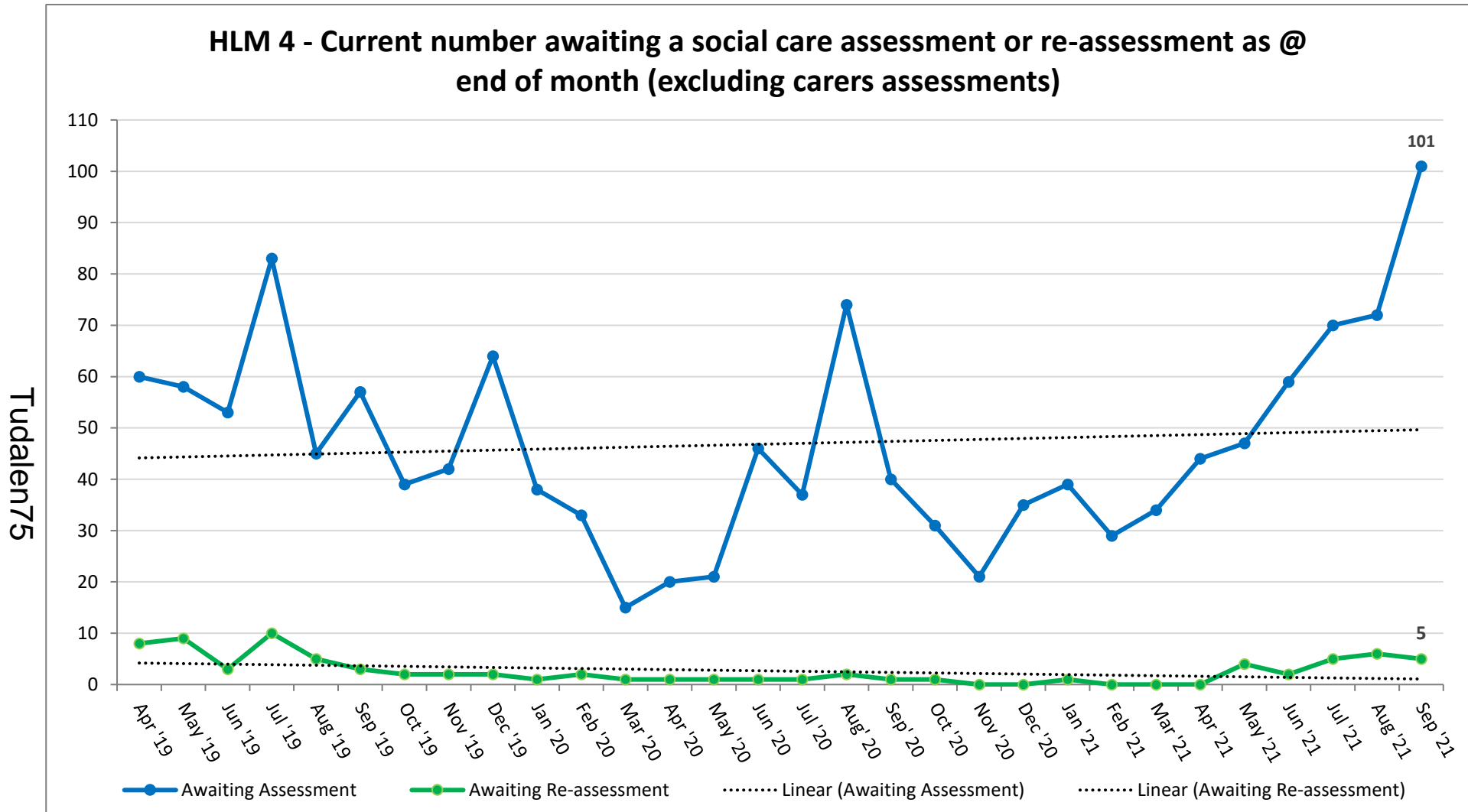
NB. There is an ongoing MoC being undertaken throughout Adult Social Services, which has led the new establishment of a high proportion of newly created vacancies. Specifically these have been Community Social Workers, CWT Support Workers, Lac's, Consultant Social Workers and Community Occupational Therapists. This has been funded due to the directorate receiving additional permanent and temporary financial funding. . Stage 1 of the Moc was completed on 6th September 2021 and there is now a significant recruitment effort underway. A small proportion of the vacancies have also arisen due to leavers in the previous quarter and employees accessing flexible working arrangements.

- **High Level Measure 3 (Adult Services) – Percentage of Supervisions Completed within Timescale**



HLM 3 – Percentage of completed supervisions of caseload holding staff within 28 working days at the end of each month.

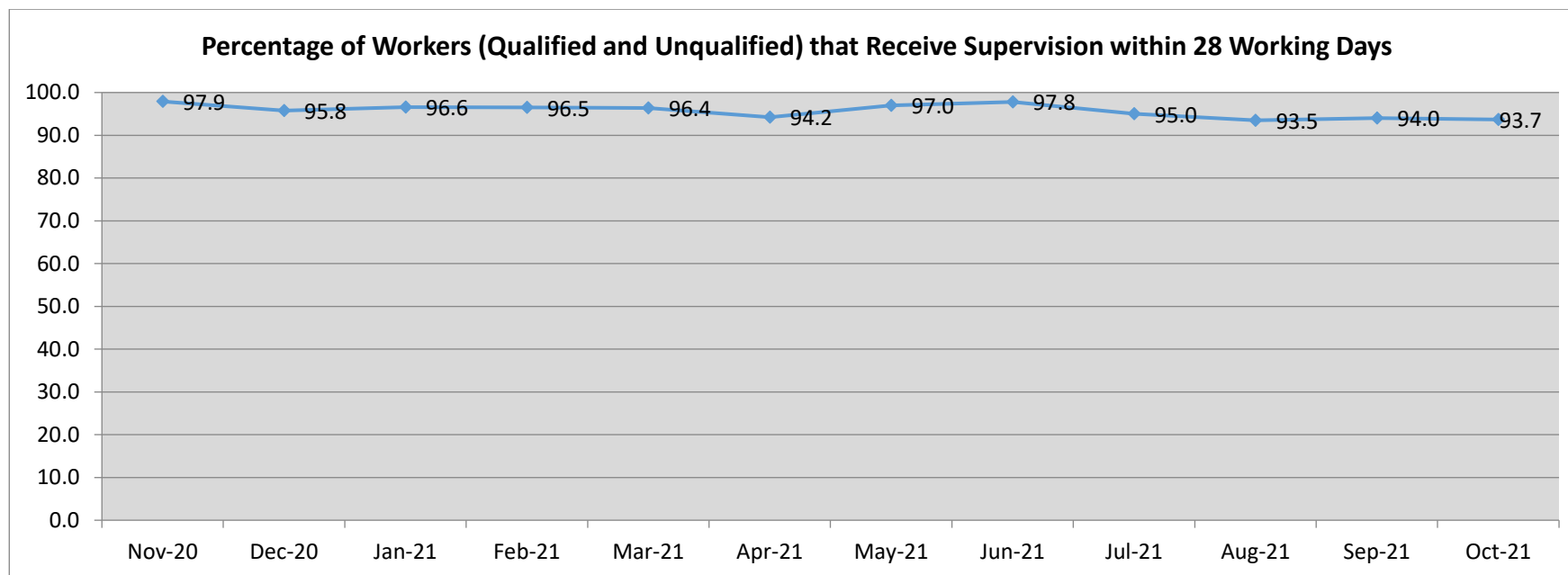
- **High Level Measure 4 (Adult Services) – Service Users Awaiting a Social Care Assessment/Re-Assessment**



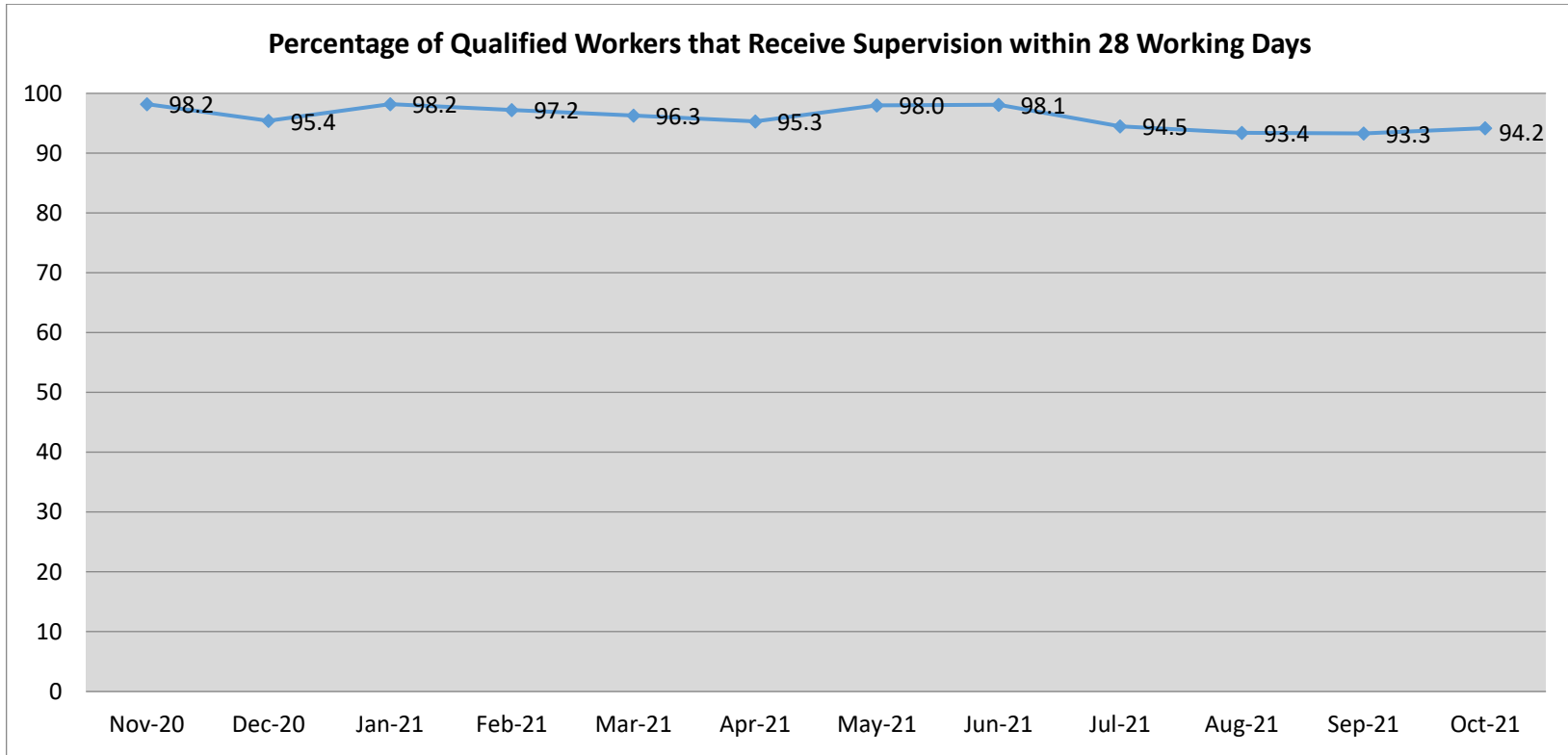
HLM 4 – Unallocated service users awaiting a social care assessment/re-assessment as at the end of each month.

• **High Level Measure 5 (Children & Young People Services) – Staff Supervision Rates**

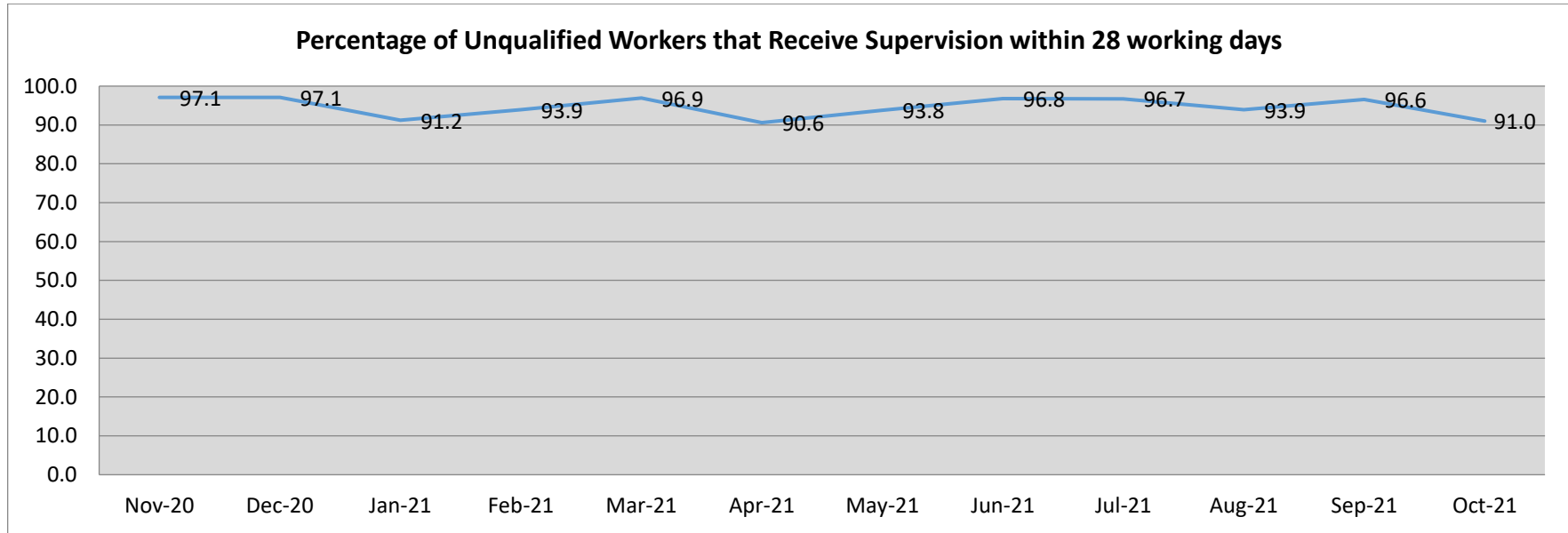
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	Nov 20	Dec 20	Jan 21	Feb 21	Mar 21	Apr 21	May 21	Jun 21	July 21	Aug 21	Sep 21	Oct 21
Performance Indicator/Measure	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Actual
The % of all workers that receive Supervision within 28 working days	97.9	95.8	96.6	96.5	96.4	94.2	97.0	97.8	95.0	93.5	94.0	93.7
Number of workers due Supervision	143	142	148	141	140	138	135	137	140	139	134	126
Of which, were undertaken in 28 working days	140	136	143	136	135	130	131	134	133	130	126	118



	Nov 20	Dec 20	Jan 21	Feb 21	Mar 21	Apr 21	May 21	Jun 21	Jul 21	Aug 21	Sep 21	Oct 21
Performance Indicator/Measure	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Actual
The % of Qualified Workers that receive Supervision within 28 working days	98.2	95.4	98.2	97.2	96.3	95.3	98.0	98.1	94.5	93.4	93.3	94.2
Number of workers due Supervision	109	108	114	108	108	106	102	106	110	106	105	104
Of which, were undertaken in 28 working days	107	103	112	105	104	101	100	104	104	99	98	98



	Nov 20	Dec 20	Jan 21	Feb 21	Mar 21	Apr 21	May 21	Jun 21	Jul 21	Aug 21	Sep 21	Oct 21
Performance Indicator/Measure	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Actual
The % of Unqualified Workers that receive Supervision within 28 working days	97.1	97.1	91.2	93.9	96.9	90.6	93.8	96.8	96.7	93.9	96.6	91.0
Number of workers due Supervision	34	34	34	33	32	32	32	31	30	33	29	22
Of which, were undertaken in 28 working days	33	33	31	31	31	29	30	30	29	31	28	20

- **High Level Measure 6 (Children & Young People Services) – Average Number of Cases held by Qualified Workers across the Service**

As at 31st October 2021		Caseload Information - Qualified Workers, including Deputy Team Managers			
Team	Available Hours	FTE Equivalent	Team Caseload	Highest Worker Caseload	Average Caseload per Worker
Cwrt Sart	296.0	8.0	124.0	15	15.5
Disability Team	495.5	13.4	175.0	19	13.1
LAC Team	389.5	10.5	136.0	16	12.9
Llangatwg	370.0	10.0	121.0	15	12.1
Sandfields	370.0	10.0	75.0	12	7.5
Route 16	244.2	6.6	67.0	16	10.2
Dyffryn	333.0	9.0	98.0	15	10.9
Intake	481.0	13.0	150.0	24	11.5
Totals	2,979.20	80.5	946.0		
Average Caseload - CYPS				16.5	11.7

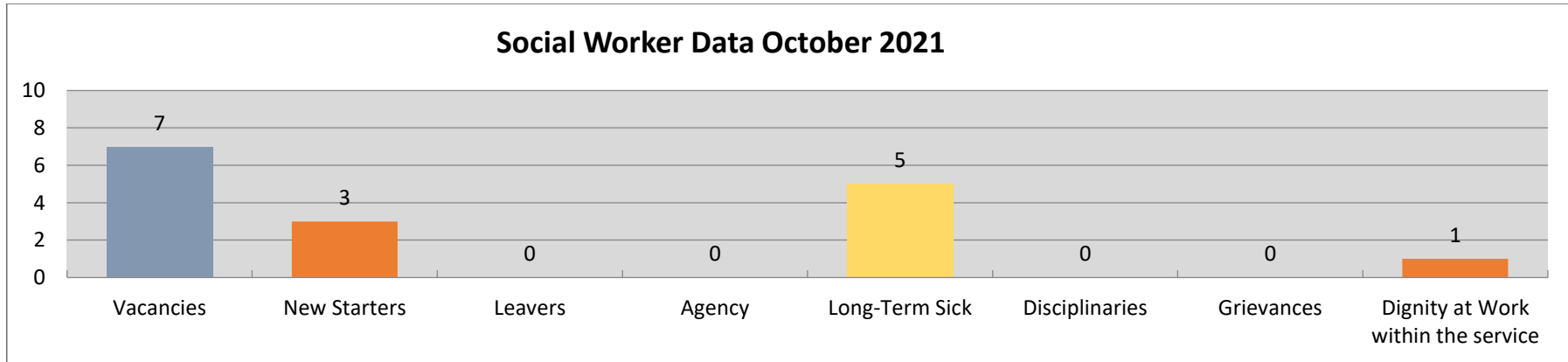
Tudalen 79

Please Note:

1. Cases held by Deputy Team Managers and Part-Time Workers are included in the above figures.
2. The '*Available Hours*' do not include staff absences e.g. sickness, maternity leave, placement, etc., unless cover has been provided for the post.

- **High Level Measure 7 (Children & Young People Services) – The Number of Social Worker Vacancies (includes number of starters/leavers/agency staff/long-term sickness), Disciplinarys and Grievances across the Service.**

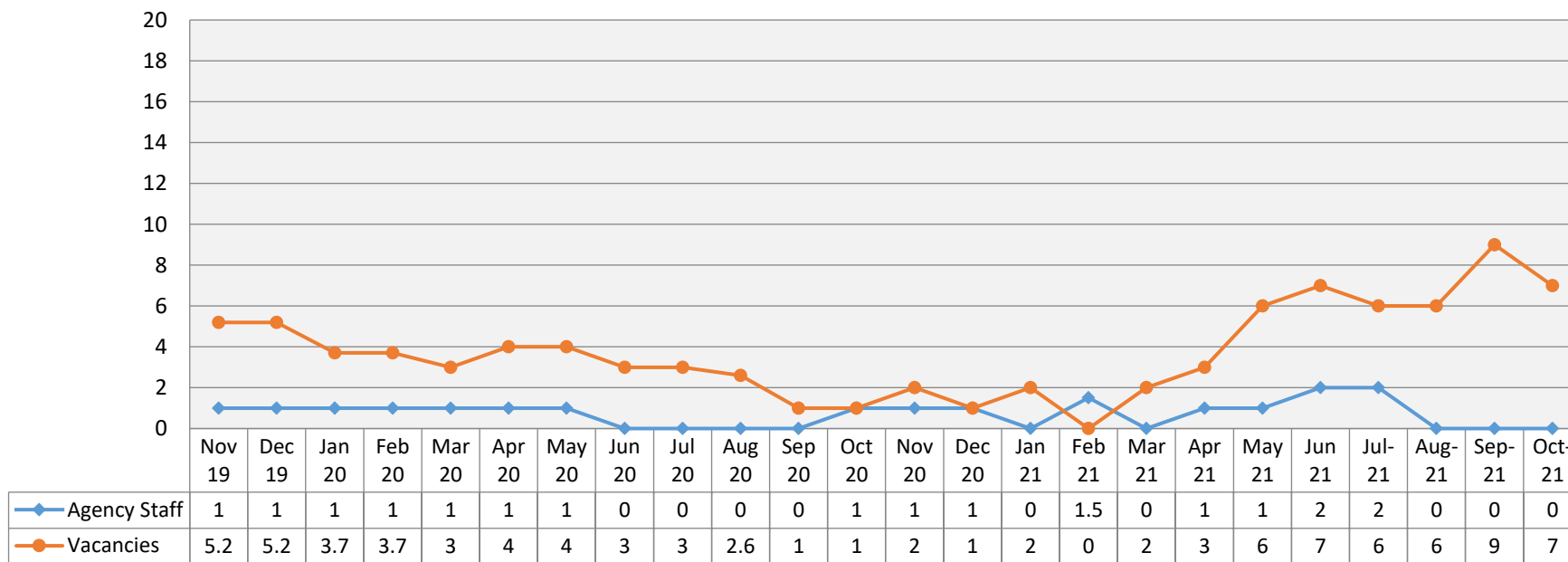
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	Team Manager (out of 9)	Deputy Manager (out of 16)	Social Worker (out of 63.6)	Peripatetic Social Worker	IRO (out of 11.5)	Consultant Social Worker (out of 9)	Support Worker (out of 21)	Total
Vacancies		1	4		1	1		7
New Starters			2			1		3
Leavers								0
Agency								0
Long-Term Sick			4		1			5
Disciplinarys								0
Grievances								0
Dignity at work within the service								1

Summary of Agency Staff and Vacancies across the Service

Summary of Agency Staff and Vacancies Across the Service (Nov 19 - Oct 2021)

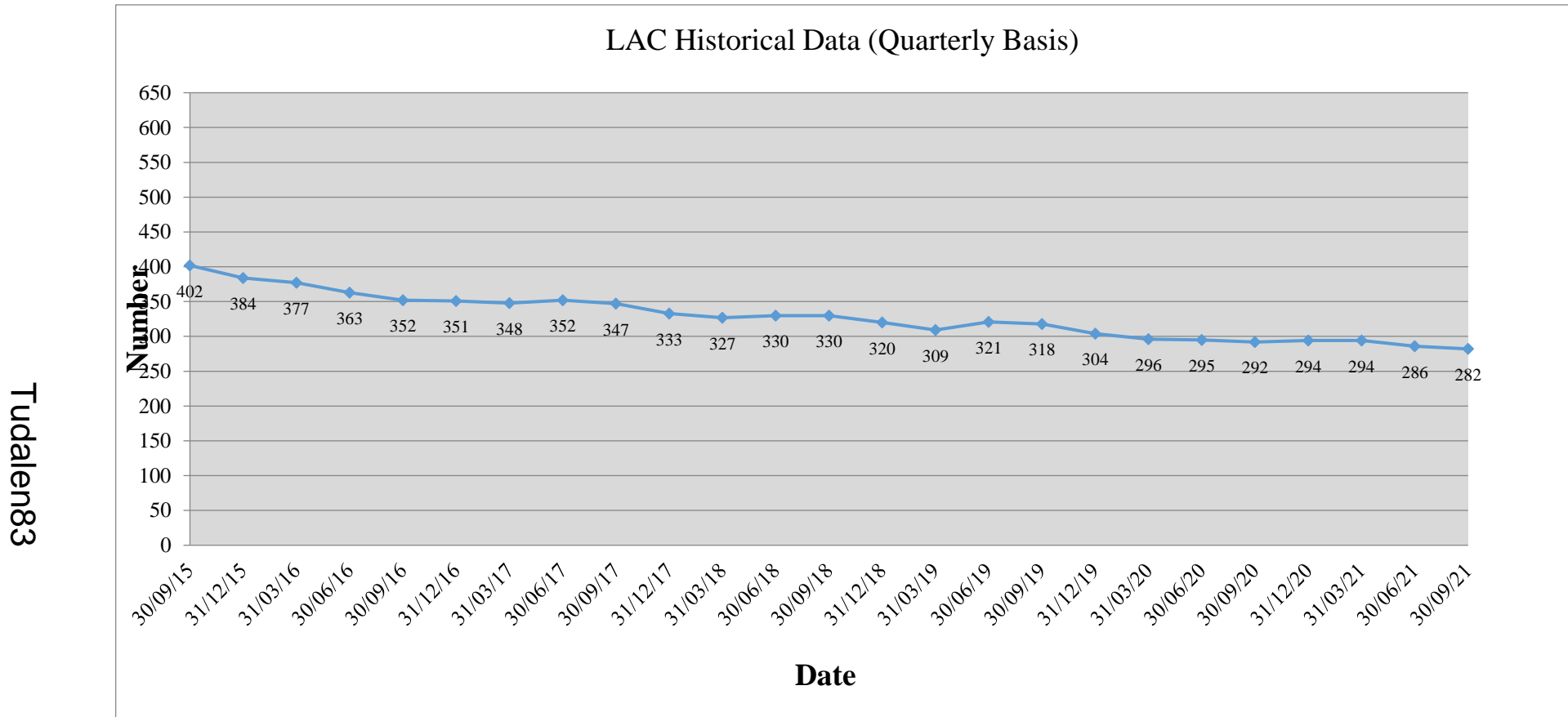


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- **High Level Measure 8 (Children & Young People Services) - Thematic Report on the findings of Case File Audits (reported quarterly)**

There is an audit programme in place which facilitates the scrutiny of various aspects of activity within Children & Young People Services. The findings of the audit activity undertaken during the **2nd Quarter Period (July 2021 – September 2021)** can be seen at **Appendix 6** of this report.

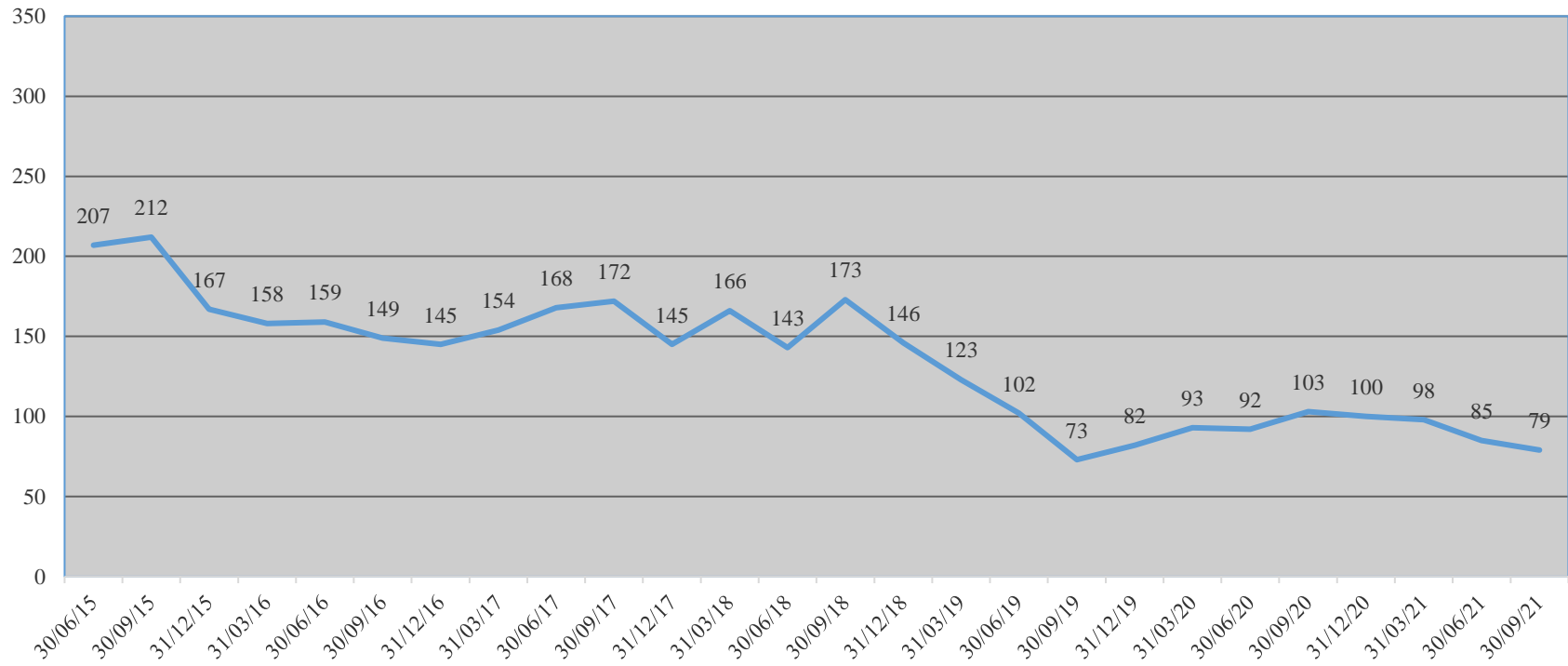
- **High Level Measure 9 (Children & Young People Services) – Number of Looked After Children (Quarterly)**



Please Note: The number of Looked after Children as at 31/10/21 –**276**

CP Historical Data (Quarterly Basis)

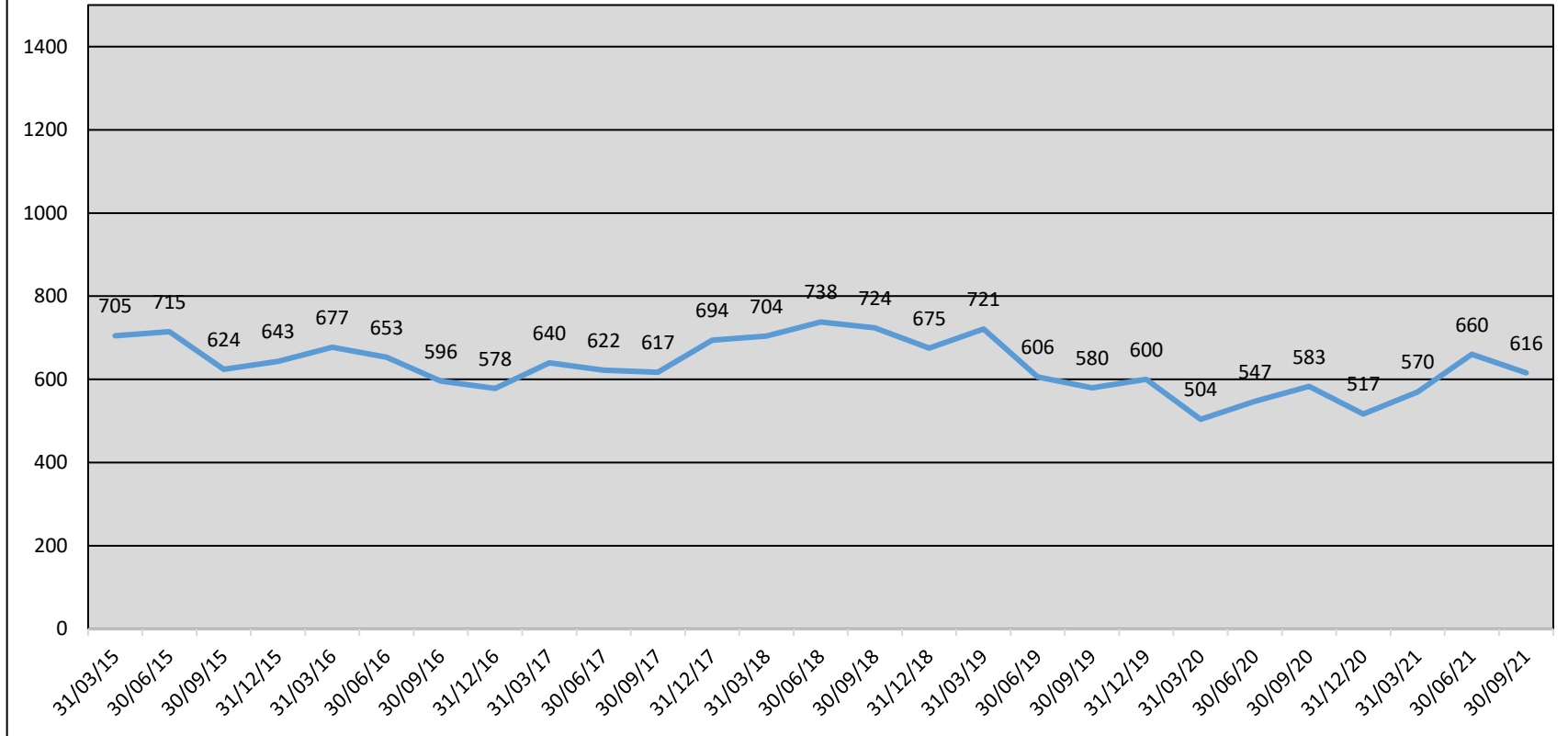
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Please Note: The number of children's names on the Child Protection Register as at 31/10/2021 – **84**

Children Receiving Care and Support Historical Data (Quarterly Basis)

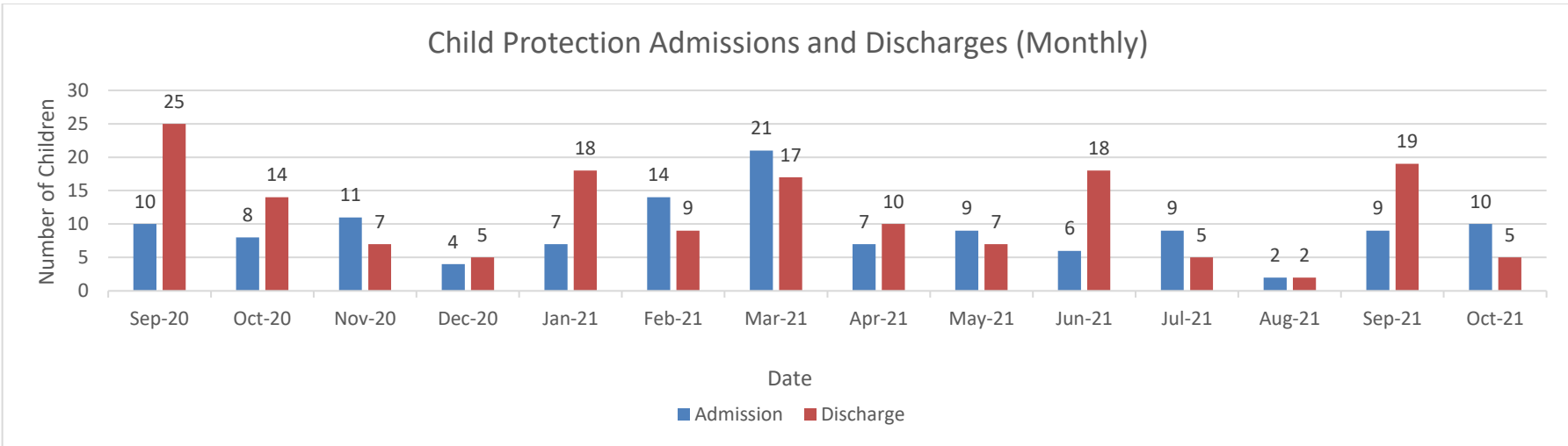
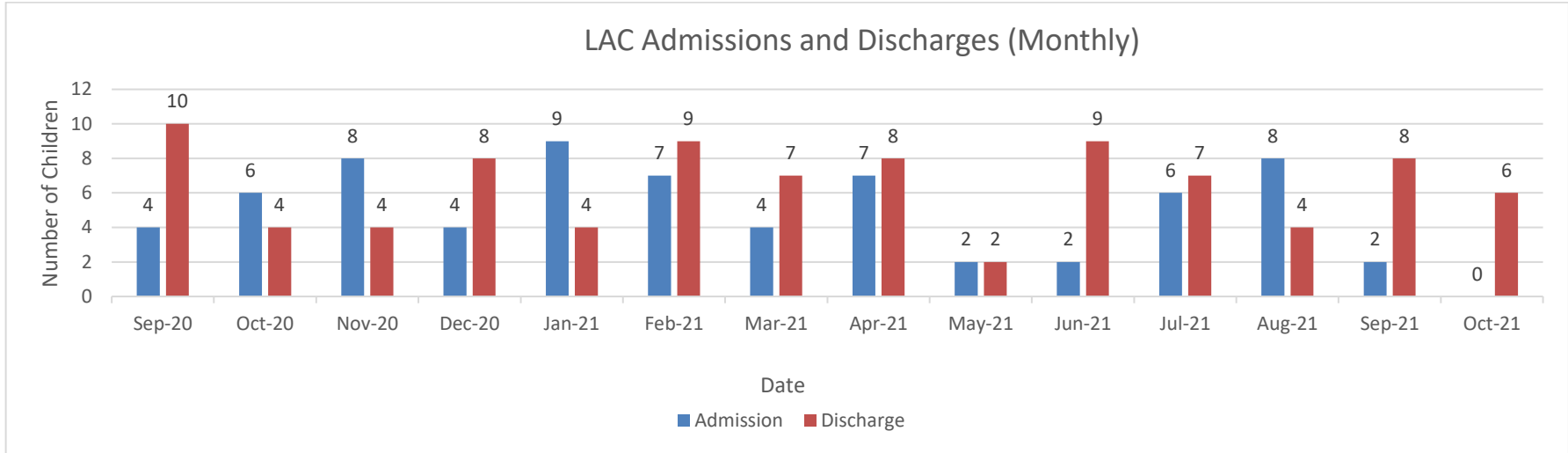
Tudalen85



Please Note: The number of Children Receiving Care and Support as at 31/10/2021 – **584**

- **High Level Measure 10 (Children & Young People Services) – Looked after Children & Child Protection Admissions and Discharges.**

Tudalen86



- **High Level Measure 11 (Children & Young People Services) – Personal Outcomes**

The Local Authority are developing an Outcome Focussed Framework designed to focus on strength based practice across children and adult services. This will be the first outcomes framework that has been developed in Wales and is being supported by Social Care Wales with the aim of adapting and rolling it out, to other Local Authority's across Wales. The framework is due to be completed by January 2022.

Consultant Social Worker's Conference

Unfortunately last year's annual Consultant Social Workers' (CSW) Conference did not go ahead due to lockdown, however, a new date has been set for the end of January 2022 for a virtual conference. The conference will, as always, showcase the positive work that has been undertaken by the CSW's as well as having guest speakers and it will be underpinned by the outcomes model. The outcomes framework will be launched at the conference to partner agencies and committee members.

Participation and engagement

It is important that the outcomes model develops and maintains momentum throughout practice. An area that needs further development is making sure that all paperwork and plans are easy to understand are achievable for families and are in the words of the child, young person, person, parent, carer or relative to whom it may affect. We have approached families in children services to take part in a survey, which has been led by the participation and engagement team. This will allow us further insight into whether the model has made a positive difference to people's lives as well as identify areas for service improvement.

Alongside the survey an internal audit will be carried about by the CSW's focussing on the care plans to look at whether they are jargon free, in the voice of the people and easy to follow. The audit will also identify areas of improvement.

Training

Feedback from the participation and engagement survey and audit will identify further areas of training for staff. The Local Authority have pledged a commitment to continue training staff and identified staff across the service that will become train the trainers so that the roll out of training can continue involving new members of staff, partner agencies and any other identified areas in the future.

Tudalen 88

To give some context to the number of Personal Outcomes we are working towards achieving with families, of the 759 Care & Support Plans we have open across the Service, where a Personal Outcome has been identified, there are 1,328 Personal Outcomes recorded within the Care Plans. The following table provides a breakdown by each team: -

Team	Number of Care & Support Plans	Number of Personal Outcomes
Looked After Children (LAC)	141	213
Child Care Disability	205	374
Llangatwg	97	155
Sandfields	63	122
Leaving Care	64	198
Dyffryn	82	113
Cwrt Sart	107	153
Total	759	1328

- **High Level Measure 12 (Children & Young People Services) – Participation & Engagement (Voice of the Child)**

During the period July 1st – September 30th a range of activities were organised by the Engagement & Participation Officer (E&PO) for children and young people. The main focus for this period was the school summer holiday and promoting the nationwide theme of ‘Haf o Hwyl/Summer of Fun’ endorsed by Welsh Government and Children’s Commissioner for Wales. The outcome of the activities/events was to improve the wellbeing of our children & young people during the pandemic and provide opportunities to build relationships with peers and staff and exercise their children’s rights.

Activities and events that were organised included:

Animal Care Group – having been requested by Social Workers who have been undertaking work with children who display harmful behaviour to animals and the lack of programmes available in the community due to Covid 19, a four-week programme of activities was developed to promote caring behaviour towards animals. Four sessions provided primary age children fun activities such as creating fat balls for birds in our gardens, art session, a visit from Olga the therapy dog and finally a visit to the Alpaca Sanctuary. Children also learnt cooking skills at each session. The programme was well received by participants and parents who supported.

A Girl’s Rights Group has been established to enable care experienced girls 11+ to exercise their rights, improve their wellbeing and have fun. Throughout July and August, the group met weekly and included trips out for afternoon tea, lunch, women’s only gym and accessing the new Abbey View Centre. Due to school and college commitments, the group now meet fortnightly going forward. The members are focussing on Period Dignity & Safe Spaces for girls and women to exercise. The group are presently campaigning to ensure all foster carers are educated and prepared when a girl/young woman comes to live with the family. This includes a welcome letter of support for girls from the group and a list of essentials that carers could stock. News of the group’s great work reached the Children’s Commissioner Sally Holland who attended a group meeting whereby the girls enjoyed a cheesecake making masterclass from a chef. The group regularly contribute to the Children’s Commissioner for Wales (CCfW) monthly missions.

A closer working relationship with the Youth Justice Early Intervention Service (YJEIS) has been fostered. The E&PO has developed an 8-week programme of Life Skills for young people receiving support from the Youth Justice Service and from the 14+ & Care Leavers Team. The weekly sessions include learning to cook healthy meals on a budget. Budgeting is also taught to

further encourage the transition to independence. These weekly sessions are also a chance for young people to get out, meet others and build relationships with professionals. Further work has been undertaken by the E&PO to consult with young people on the renaming of Abbey View. A number of consultations took place to promote the venue to young people and to encourage engagement. A BBQ was organised and a graffiti workshop all helped to develop the new name – Base 15. The artwork is displayed on the walls of Base 15. Additionally, the voice of the young people is captured in the Exit Questionnaire conducted when young people no longer need the support of the service. Young people enjoyed a day Gorge Walking in the picturesque Waterfall Country. The activity was hugely successful in improving confidence and self-esteem. Initial planning is underway to further collaborate with the company and offer outdoor activities in 2022. A gaming company has been recruited by YJEIS management to develop a game to be used as a tool to improve wellbeing. The E&PO recruited young people to partake in consultation work to ensure the game meets the needs of our service users.

To celebrate National Play Day a fun event was organised for all children and young people to attend. Circus Eruption held a fun circus skills session and the event gave the E&PO the opportunity to consult with participants on the Let's Talk initiative. This conversation was to help develop the Local Authority's plan going forward. Throughout the Summer Holiday, children and young people contributed to the Let's Talk consultation when attending events with the E&PO.

To extend opportunities to our children and young people the E&PO has forged partnerships with community based organisations. Bulldogs Community Gym have a fun weekly club for care experienced children and young people. Additionally, the E&PO has co-ordinated the set-up of a Bike Maintenance Course. A course booklet has been created and approved by Agored Cymru to deliver a Level 1 Bike Maintenance Course to our young people and others in the community. The course focusses on basic maintenance and repair of bicycles. Bikes were sourced from the community and tools supplied to ensure young people had all the equipment needed.

The Junior Safeguarding Board (JSB) have been particularly busy throughout this period. Further opportunities have been provided for children and young people to contribute to the JSB's current topics. A resource has been developed to give members of the LGBTQIA+ community a voice on safeguarding issues. Sixteen young people from NPT & Swansea enjoyed an action packed day in Margam Park. Activities included paddle boarding and orienteering. The resource was further developed to meet their needs. A second event is planned for October in Port Eynon to complete the resource with plans to launch in National Safeguarding Week.

To provide opportunities for children and young people with disabilities the E&PO has continued to support the music group in Ysgol Hendre Felin. The group enjoy fun activities along with singing. Through links developed by the E&PO, Circus Eruption attended the group on a fortnightly basis to teach circus skills.

A promotional event was organised to launch Yovo's Comic centred round the language we use in Children's Services. With the support of Voices from Care Cymru the Comic and images, evidencing the work of the young people was displayed in Neath Town Hall for young people and professionals to view. The E&PO visits our other young person's action group LOVE in Hillside monthly.

Further engagement opportunities organised by the E&PO have included;

- Surfing on Aberavon Beach
- Visit to the Alpaca Sanctuary for the Girls' Rights Group
- Promoting outdoor activities run by the Youth Service for care experienced children 11+
- Online art session with the Paint Along Lady whereby all equipment was posted to children to avoid barriers to participation
- Training for young people to become a Board Member with Children's Rights Unit Neath
- Hiking in the Brecon Beacons with support from Mid & West Wales Fire and Rescue (MAWWF&R) Service and Brecon Beacons National Park
- 2 Family Beach Days were organised on Aberavon Beach. The Youth Service, Circus Eruption and Moment of Calm Yoga all delivered fun sessions at the event.
- Big Lottery Fund – children and young people were consulted with to support a Big Lottery bid led by Consultant Social Worker Ian Rees. Children and young people shared what was important to them. Younger children shared their thoughts through Beach Art.

Mae'r dudalen hon yn fwiadol wag

Quality Assurance Overview Quarter 2

Quality Practice Strategic Group

The Quality Practice Strategic Group meets on a fortnightly basis and is made up of principal officers, managers, deputy managers, consultant social workers and quality assurance officers from across the directorate representing a wide range of teams. The primary aim of the group is to ensure that the Quality Assurance and Learning Framework is embedded and evidenced through practice and provides assurances to senior leaders on the quality of social care throughout the directorate.

Our guiding principles for embedding the framework are that:

1. Children, young people, adults, families and carers are at the heart of what we do. The focus of quality assurance must be on impact and outcomes for the child, young person or adult in their journey through our social work and safeguarding systems.
2. The approach to Quality Assurance will be underpinned by Restorative Practice, and a desire to examine and capture best practice. This means that QA activity is done “with” staff, rather than “to” or “for”, in ways that build relationships and are characterised by respecting each other’s perspectives, high expectations, high support and high challenge, to enable use to learn, improve and change.
3. Throughout the quality assurance processes the views of children, young people, adults, families and carers are integral to improving our services, we will where reasonable and practicable to do so, gain the voice of those who have received our services.
4. Our multi-agency and collaborative working with our partners, whether statutory or 3rd sector will be enriched and where practicable we will include them within our QA processes

Quality Assurance Activity Includes:

- **Audits and dip sampling:** This is a core area of the framework in that regular audits or dip sampling is performed across the functions of the department to establish a baseline in practice and process, both qualitative and quantitative. These are completed either internally or on a multi-agency basis.
- **Learning Reviews:** Learning reviews are undertaken on cases/families identified by practitioners with the aim to try to understand why it made sense for people to do what they did – against the background of their physical and psychological work environment. A timeline is completed of the case which then facilitates a walkthrough of the timeline with practitioners involved to identify shared learning that can lead to changes in practice and process. The point of the review is not to assign blame or responsibility, but to learn: to learn to improve.

- **Case Studies:** Case studies are completed by practitioners and presented to the Quality Practice Strategic Group by the author with the aim being to highlight good practice, areas for development and learning that is cascaded across the directorate and overseen by the group.
- **Research:** The Quality Practice Strategic Group has oversight of all research undertaken both on an internal and external basis that is relevant to the directorate and coordinates the dissemination of key messages to the workforce in addition to any action plans
- **Performance Clinics:** All teams will run a structured review of quality assurance feedback and data every 6 months, through a “Performance Clinic” meeting with a range of senior leaders for shared learning. Teams will receive:
 - Performance Indicators for their team
 - Results from audits
 - Consultation data
 - Key practice issues arising from practice reviews
 - Learning from feedback, compliments and complaints
 - Feedback from practice observation

This report seeks to provide members with an overview of some of the quality assurance activity that has taken place or been reported during quarter 2 in 2021-22, and will highlight what is working well, what we can improve and next steps in relation to quality assurance. This report collates activity from across Social Services: Children and Young People Services, Adult Services and Youth Justice Early Intervention Service and the work of the Quality Practice Strategic Group.

During this quarter the strategic group has had oversight of a number of key areas of work across the directorate such as of the work being undertaken around Liberty Protection Safeguards (LPS), which provides protection for people aged 16 and above who are or who need to be deprived of their liberty in order to enable their care or treatment and lack the mental capacity to consent to their arrangements. Due to the changes in legislation, this has required the department to review all cases that are affected, the Quality Practice Strategic Group has oversight of this work through the Principal Officer for Safeguarding.

A total of three learning reviews have been requested and accepted by the group, this includes one Children and Young People Services family group, one young person known to the Youth Justice and Early Intervention Team and three adults known to Adult Services. A timeline/sequence of events for these three cases will be compiled with all practitioners within the department who were involved in the case(s) “walking” through the timeline to identify what worked well, what could have been improved and establishing if there is wider learning for the directorate.

The group received two audit requests for consideration, one from the Strategic Outcomes Group to “dip sample” the quality of plans across the directorate which will feed into the Outcomes Strategy currently being completed. A second request was made from the Youth Homelessness Group to ascertain the extent of youth homelessness within the local authority and to highlight areas for further development.

The group also considered the findings of audit activity being undertaken independently by teams such as a report on males who access the Youth Justice and Early Intervention Service which identified themes, patterns and trends. The Emergency Duty Team also provided a breakdown of work they had been involved in out of hours in particular those individuals requiring mental health assessments. Further analysis is taking place on a cohort of cases to establish if these need to be reviewed in more detail as a collective.

Audits and Dip Sampling Activity

The summer period is a time when quality assurance activity typically slows down to accommodate the fact that more workers are on annual leave and team numbers are therefore lower than usual. This year has been no exception and in particular audit activity has been kept to a minimum across all teams especially with the remodelling of adult services and the spike in COVID-19 cases across the locality.

The audit programme continues to adapt and be flexible to change when the demands on teams within Social Services are high, whilst this quarter has seen a lower amount of quality assurance activity than usual there has still be progress in other areas of the framework such as through learning reviews and requests for audit. The group will continue to monitor the audit programme to ensure that practitioners across the directorate have capacity to participate in any planned activities.

Mel Weaver

Quality, Performance and Practice Manager

Mae'r dudalen hon yn fwriadol wag

**NEATH PORT TALBOT COUNTY BOROUGH COUNCIL
Social Care Health & Well-being Cabinet Board**

9 December 2021

Report of the Head of Adult Services - Angela Thomas

Matter for Decision

Wards Affected All wards

SHARED LETTINGS POLICY 2021 - CONSULTATION EXERCISE OUTCOME

Purpose of the Report

To inform Members of the outcome of the recent 90-day consultation exercise on the Council & Tai Tarian's Shared Lettings Policy 2021 and seek approval of both the consequently amended Policy attached at Appendix 1 and its phased implementation as outlined in the report.

Executive Summary

A 90-day consultation exercise has been completed on the recently reviewed Council & Tai Tarian shared housing lettings policy. The original draft document has consequently been amended (a copy of the proposed updated Policy is attached at Appendix 1) and it is proposed this will be subject to the necessarily phased implementation outlined in the report.

Consultation exercise

What we did

In addition to the Policy itself, the following were made available in English and Welsh for 90 days:

- A Summary Policy document;
- an online and hard-copy consultation questionnaire with targeted questions;
- a consultation booklet for those unable to access the Council's Consultations webpage;
- a summary Plan on a Page document; and
- an Easy-read outline of the consultation exercise.

All registered applicants for housing by Tai Tarian, other housing associations with housing stock in the County Borough, and all other strategic housing partnership agencies were specifically notified of the consultation exercise. It was also generally publicised, both on the Council website and in staff and public on-line newsletters.

During the consultation period, Council and Tai Tarian officers attended a 'special' Social Care Health & Wellbeing Scrutiny Committee meeting to provide an overview of the reviewed Policy and address questions raised in advance by Members.

Officers from Tai Tarian also liaised with officers from the Council's Public Protection Service to agree further minor changes around the Council's involvement in assessing the current housing conditions of applicants for housing by Tai Tarian.

Who responded

There were 11 online consultation questionnaires registered on the system but in 3 instances none of the questions were answered.

Of the remaining 8, 4 were applicants on the Tai Tarian Homes By Choice housing register, two were existing Tai Tarian tenants, 1 was a Tai Tarian employee, and the other a case-worker from a homelessness support agency based in Swansea.

Of these 8, only 4 (that is 2 of the housing applicants, the Tai Tarian employee, and the homelessness support agency case-worker) made supplementary comments.

Other than those given at the Special Scrutiny Committee, the only other consultations responses were received from Council Public Protection Service colleagues.

What they said

CONSULTATION QUESTIONNAIRES

It is obviously not possible to draw any conclusions as to the opinion of anyone else consulted on the basis of 8 questionnaire responses and so they have not been analysed or presented in any detail.

It is however clearly noteworthy that, of all those who were signposted to the online consultation exercise, including in excess of 2,700 registered applicants for

housing by Tai Tarian, negative responses were only received from the following very small numbers of respondents:

Consultation question subject	Disagreed
Factors to be taken into consideration when assessing eligibility.	2
The methods of assessment for applications.	2
Urgent banding criteria.	1
Gold banding criteria.	2
Silver banding criteria.	4
Bronze banding criteria.	4
The criteria for transfers.	1
The criteria for housing conditions.	3
The criteria for housing under-occupation.	2
That the proposals will improve the allocations process.	4
That the proposals will have no negative impact on any particular group of people.	4

Supplementary comments were only made by 4 of the 8 who completed consultation questionnaires. Again, no wider conclusions should be drawn from so few responses but they have been summarised into two themes and responded to by Tai Tarian as follows:

Access to housing themed comments (eligibility and prioritisation)

- The Housing Register should be open to all and not dependent upon need.
- Difficulty accessing social housing when already adequately housed, have access to children and pets.
- Unacceptable behaviour considerations.
- Bedroom tax (Dept. of Work and Pensions) restrictions which can impact upon property type eligibility.

Tai Tarian response

The Housing Register is open to all individuals who are not excluded as defined in the Policy; the legal framework for the allocation of accommodation requires reasonable preference to be demonstrated to certain categories of people in housing need. In addition, prioritisation is required because demand is greater than the supply of social housing with Tai Tarian currently receiving 140 housing applications per week. Factors such as unacceptable behaviour and income/affordability are considered on a case-by-case basis to ensure future tenancies are sustainable.

Assessment of need themed comments (support, behaviour and financial etc.)

- Queries about rent in advance and credit check requirements.
- The need for consistent and objective mechanisms for assessments (support needs, housing needs, financial assessments).
- More detail required about advice and assistance.

Tai Tarian response

Rent in advance is charged in accordance with the tenancy agreement at the start of the tenancy (one week in advance). Credit checks are undertaken to ensure applicants can afford to maintain rent payments, which is an important element of creating sustainable tenancies. Advice and assistance available to applicants applying and bidding for housing with Tai Tarian, together with the process for support need and affordability assessments is referenced within the policy.

SPECIAL SCRUTINY COMMITTEE MEETING

All questions raised by Scrutiny Committee Members were either answered to their satisfaction on the day or else further action by Tai Tarian to clarify matters was agreed.

MEETINGS WITH COUNCIL PUBLIC PROTECTION OFFICERS

The majority of changes requested were agreed to be procedural implementation issues that did not impact on the Policy itself.

What we changed as a result

CONSULTATION QUESTIONNAIRES

Because of the very small numbers involved and the fact that all objections raised in the 8 consultation questionnaires can be evidentially countered, no changes are proposed to the Policy because of the responses received.

SPECIAL SCRUTINY COMMITTEE MEETING

A number of minor changes or additions to the sections of the draft Policy questioned were consequently made. These are reflected in the revised Policy attached at Appendix 1, the implementation of which is not attendant on the completion of any outstanding further action agreed by Tai Tarian.

MEETINGS WITH COUNCIL PUBLIC PROTECTION OFFICERS

Agreed minor changes were made to relevant sections of the updated Policy attached at Appendix 1. The Policy itself will not be further affected by any

outstanding implementation procedural issues that are yet to be ironed out between the Council's Public Protection Service and Tai Tarian.

Phased Policy Implementation

It is proposed that the new Policy is fully operationally implemented by Tai Tarian from April 2022, upon the satisfactory completion of the actions contained within its project management framework.

This includes the Council's input to the review and migration of the Council's 300 plus Housing Options Team and half a dozen or so Environmental Health related applications.

In addition, this will enable time for staff training, publicity, IT migration and the development of new systems, including digital lettings or revisions to existing ones.

Financial Impacts

There are no known or anticipated additional financial implications for the Council as result of the proposal.

Integrated Impact Assessment

The Integrated Impact Assessment completed prior to the consultation exercise has been revisited in light of the outcome of the exercise. The number of consultation respondents was insufficient to allow for any statistically relevant additional extrapolation of equalities data for the whole Tai Tarian housing applicant population. The assessment attached at Appendix 2 has therefore been updated as far as is possible but its conclusions remain that:

- "There are potential gaps in the available equalities data because the data set only relates to 10% of current applicants to Tai Tarian for housing - i.e. those applicants who chose to provide it; however
- there are no currently known or anticipated negative impacts on any applicant, by virtue of the protected characteristics of any member of their household; and
- the potential positive impacts are maximised, as far as is currently possible."

Valleys Communities Impacts

The policy has no spatial impact on our valleys communities and does not link to the impacts identified in the Cabinet's response to the Council's Task and Finish

Group's recommendations on the Valleys.

Workforce Impacts

There are no known or anticipated workforce implications associated with this proposal.

Legal Impacts

The Policy has been reviewed and consulted on in line with the requirements of all relevant Housing legislation and guidance.

Risk Management Impacts

There are no known or anticipated risks associated with this proposal.

Crime and Disorder Impacts

Section 17 of the Crime and Disorder Act 1998 places a duty on the Council in the exercise of its functions to have "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:

- a) Crime and disorder in its area (including anti-social and other behaviour adversely affecting the local environment);
- b) The misuse of drugs, alcohol and other substances in its area; and
- c) Re-offending the area"

There is no known or anticipated impact under the Section 17 of the Crime and Disorder Act 1998 from the proposal contained in this report.

Counter Terrorism Impacts

The proposal contained in this report is neither known nor anticipated to have any impact on the duty to prevent people from being drawn into terrorism.

Violence Against Women Domestic Abuse and Sexual Violence Impacts

Section 2(1) of the Violence Against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015 introduced a general duty where a person exercising relevant functions must have regard (along with all other relevant matters) to the need to remove or minimise any factors which:

- (a) increase the risk of violence against women and girls, or
- (b) exacerbate the impact of such violence on victims.

The proposal contained in this report is neither known nor anticipated to have any negative impact on the above duty.

Consultation

The Policy has been the subject of a public consultation exercise as is required.

Recommendations

It is recommended that members giving due regard to the Integrated impact assessment:

- Members approve the Neath Port Talbot Council & Tai Tarian Shared Lettings Policy 2021 attached at Appendix 1 for phased implementation as set out in the report.
- The Head of Adult Services is given delegated authority in consultation with the relevant Cabinet Member to agree with Tai Tarian's Director of Housing any further minor changes to the Policy necessary to affect its timely and effective phased implementation as set out in the report.
- The Head of Adult Services is given delegated authority in consultation with the relevant Cabinet Members to agree with Tai Tarian's Director of Housing any changes required to the Policy because of change in legislation, guidance or operating process, prior to its next overall periodic review.

Reasons for Proposed Decision

To ensure that the Council & Tai Tarian have a recently reviewed Shared Lettings Policy that is implemented in a timely and yet necessarily phased manner and which continues to comply with all applicable legislation and guidance until next periodically reviewed.

Implementation of Decision

The Policy document is proposed for adoption after the three day call-in period and subsequent phased implementation as outlined in the report.

Appendices

Appendix 1 - Neath Port Talbot County Borough Council & Tai Tarian Shared Lettings Policy 2021.

Appendix 2 - Integrated Impacts Assessment

List of Background Papers

None

Officer Contact

For further information on this report item contact:

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Tudalen105

Mae'r dudalen hon yn fwiadol wag

Neath Port Talbot County Borough Council

and

Tai Tarian Limited

SHARED LETTINGS POLICY

2021

Document Control			
Version Number	1	Previous version No.	N/A
Applicable To:	All Staff/Board Members Prospective Tenants	Date approved by Tai Tarian Board:	09/12/21
		Date approved by NPTCBC Board:	09/12/21
Responsible Officer(s)	Tai Tarian Director of Housing NPTCBC Director of Social Services & Housing	Next Review Date	09/12/26

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SECTION 1 – Introduction

- 1.1 Neath Port Talbot County Borough Council (the **Council**) has a statutory obligation to formulate, adopt and amend an allocation scheme and where appropriate consult on proposed changes.
- 1.2 The Council in partnership with Tai Tarian Limited (Tai Tarian) has adopted this Lettings Policy. The policy meets the requirements in Part VI of the Housing Act 1996 (the **HA 1996**) (as amended by the Homelessness Act 2002 and the Housing (Wales) Act 2014) (the **HWA**)), giving reasonable preference to those applicants in greatest need.
- 1.3 The Council retains full responsibility for the policy itself including any requirement to consult with stakeholders on any proposed changes to the policy. The Council has transferred to Tai Tarian the administrative functions and operation of a housing register (the **Housing Register**), which includes:-
 - a) The receipt of housing applications.
 - b) All assessment matters and decisions regarding eligibility under the scheme.
 - c) Carrying out any statutory review of a decision made.
 - d) Making sure that advice and information is given on allocations.
- 1.4 The allocation of properties by Tai Tarian will be undertaken in accordance with the provisions of this policy, which incorporates the following:-
 - Homes by Choice Scheme: applicants included on the Housing Register (or if authorised, the Council's Housing Options Team on behalf of such applicants) will be entitled to "bid" for vacant properties owned by Tai Tarian which are available for letting.
 - Banding Scheme: where applicants are placed in one of four bands of housing need according to their circumstances.
- 1.5 In addition to Tai Tarian properties, other Registered Social Landlords (**RSLs**) have agreements in place with the Council and information on these arrangements is contained in **Section 9** of this policy.
- 1.6 An Assured Shorthold Tenancy or Assured Tenancy will be offered by Tai Tarian (subject to legislation changes) to the successful applicant in accordance with the policy which takes into account the applicants' housing history. When the Renting Homes (Wales) Act 2016 (**RHWA 2016**) becomes operational, successful applicants will be given either standard occupational contracts or secure occupational contracts depending upon their housing history.
- 1.7 As a policy, this document sets out how the Council proposes to fulfil its statutory duties. Nothing in the policy is intended to conflict with those duties and where anything could be interpreted in more than one way, the way which corresponds most closely with statute will be applied. In addition, while setting out principles and procedures which shall normally apply, to provide a degree of certainty to Tai Tarian, and existing and prospective tenants, and how the Council has chosen to exercise

the discretions available to it, it is not intended to fetter the proper exercise of available discretion.

- 1.8 A summary of the Lettings Policy is available free of charge on request. A copy of the Lettings Policy is available on the Council's website (www.npt.gov.uk) or Tai Tarian's website (www.taitarian.co.uk). A hard copy (full or summary) will be available from Tai Tarian and the Council upon request and may be provided in larger print, in braille or in a different language.

SECTION 2 – The Legal Framework

- 2.1 Part VI of the HA 1996, as amended by the Homelessness Act 2002 and the HWA sets out the legal framework for the allocation of accommodation by Local Authorities and RSLs.
- 2.2 Tai Tarian will maintain the Housing Register and only qualifying persons shall be placed on it. The Welsh Ministers may by regulations add to or change the definition of a qualifying person. In accordance with the terms of the HA 1996 and related regulations, Tai Tarian will determine who may and who may not be included on the Housing Register.
- 2.3 A separate 'holding list' of persons who have not yet met the criteria for the Housing Register shall also be maintained by Tai Tarian.
- 2.4 The Council as a housing authority has a duty under Section 167 of the HA 1996 to ensure that in letting its properties it gives reasonable preference to certain categories of people housing need. These are:-
- People who are homeless.
 - People owed certain homelessness duties.
 - People living in unsatisfactory housing conditions (including insanitary or overcrowded housing).
 - People with a particular need to move on medical or welfare grounds.
 - People with a particular need to move to avoid hardship.

Subject to this requirement, the Lettings Policy may also reflect local priorities.

- 2.5 In applying this policy, in accordance with Section 149 of the Equality Act 2010 (the **EA 2010**), regard will be made to the need to:-
- Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the EA 2010.
 - 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.
- 2.6 In framing the Lettings Policy to provide a choice of accommodation to applicants, the policy and any adopted procedures shall meet any obligations by other existing legislation, in addition to Part VI of the HA 1996, including:-
- Housing (Wales) Act 2014
 - The Human Rights Act 1998
 - The Freedom of Information Act 2000
 - Data Protection Act 2018 and UK General Data Protection Regulations (the "**UK GDPR**") (together the "**Data Protection Legislation**")
 - The Equality Act 2010
 - Housing Act 2004

- The Homelessness Act 2002
- Anti-Social Behaviour, Crime and Policing Act 2014
- The Rent (Agriculture) Act 1976
- The Welsh Language Standards and Regulations made under the Measure

2.7 Regard will be given to the EA 2010 (Statutory Duties) (Wales) Regulations 2011 and the Council's Strategic Equality Plan.

2.8 Nothing contained in this policy shall prevent the Council and Tai Tarian from developing and agreeing local lettings policies to meet specific local issues and where relevant these local lettings policies shall apply in addition or instead of the provisions in this policy. Any such local lettings policy drawn up and entered into shall be published. All local lettings policies shall be monitored by the Council to ensure that overall this policy operates to give reasonable preference for allocations to applicants in the reasonable preference categories (s.167(2) of the HA 1996). Prior to being implemented and upon review, all local lettings policies shall need to be equality impact assessed to ensure they do not unlawfully discriminate against any of the protected characteristics listed in the EA 2010.

2.9 All local lettings policies must have clear aims and be linked to creating balanced and sustainable communities. They shall be based upon evidence which demonstrates a need for the intended approach.

SECTION 3 - Data Protection

3.1 Data Protection

3.1.1 All personal data processed by Tai Tarian is subject to the requirements of the current Data Protection Legislation. This means that Tai Tarian must have a lawful basis to process personal data about the applicant or any household member included in that application. Whilst one such lawful basis is consent of the applicant, the Data Protection Legislation provides for other lawful bases for processing personal information that do not require consent – please see below for further details in relation to such lawful bases.

3.1.2 Further information as to how Tai Tarian process personal information can be found in Tai Tarian's privacy statement - <https://www.taitarian.co.uk/privacy-statement/>.

3.2 Processing Personal Data

3.2.1 An applicant's personal data may be processed (including shared with other organisations) about an applicant or any household member included in the application where there is a lawful basis to do so. This may include the following instances:-

- Tai Tarian have the applicant's consent to process their personal data (for example, if the applicant want Tai Tarian to discuss their tenancy or application with a member of their family or another representative we will ask for their consent).
- The processing is necessary for the performance of a contract to which the applicant is a party (for example, Tai Tarian may need to conduct a credit check before they offer the applicant a property to ensure they can afford to maintain the rent payments and/or to administer the tenancy agreement with the applicant).
- Processing is necessary for compliance with a legal obligation to which we are subject to (for example, for the prevention or detection of crime and fraud, or safeguarding issues).
- Processing is necessary in order to protect the vital interests of the applicant or another person (for example, where there is a serious threat to the applicant or third party, including staff or appointed contractors or to safeguard vulnerable adults or children).
- Processing is necessary for the purposes of our legitimate interest (for example, for the efficient running of the Tai Tarian organisation, to develop and improve the properties).

3.3 Information Sharing

- 3.3.1 Normally, only Tai Tarian staff will be able to see and process applicants' personal information. However, there may be times when Tai Tarian will share relevant information with others for the purposes listed below or where the law requires to do so. When sharing personal information, Tai Tarian will comply with all aspects of Data Protection Legislation.
- 3.3.2 Information on applicants will be shared with and made available to the Council in accordance with our Information Sharing Protocol. Information will only be shared between the Council, Tai Tarian and other bodies where we have a lawful basis to do so in accordance with the Data Protection Legislation. This will usually be on the basis of processing is necessary for compliance with a legal obligation to which Tai Tarian is subject or processing is necessary for the purposes of Tai Tarian's legitimate interest.
- 3.3.3 Data sharing with other agencies may take place where we have a lawful basis to do so in accordance with the Data Protection Legislation. This will usually be on the basis of the applicant's consent, processing is necessary for compliance with a legal obligation to which Tai Tarian is subject or processing is necessary for the purposes of Tai Tarian's legitimate interest.
- 3.3.4 Information may also be made available to other housing providers for the purpose of allocating housing, assessing applications or identifying current or former tenant arrears. Again, this will usually be on the basis of the applicant's consent, processing is necessary for compliance with a legal obligation to which Tai Tarian is subject or processing is necessary for the purposes of Tai Tarian's legitimate interest.
- 3.3.5 Tai Tarian may conduct credit reference checks to obtain information on an applicant's circumstances to assess their application for housing. The lawful basis Tai Tarian usually rely on for this purpose is legitimate interest.
- 3.3.6 Tai Tarian may enter into information sharing protocols with other agencies such as the Police.
- 3.3.7 Before sharing information, Tai Tarian will ensure that the organisation given the information shall fully comply with the requirements of the Data Protection Legislation.

SECTION 4 – Access to Housing

4.1 The Housing Register

4.1.1 Tai Tarian will manage the Housing Register which comprises both existing tenants wishing to transfer to another dwelling owned by Tai Tarian and new applicants for accommodation.

4.2 Who Can Apply

4.2.1 The Housing Register is open to all individuals who are not excluded as defined in the HA1996 or deemed to be ineligible (see **Section 4.4 - Exclusions**).

4.2.2 Anyone can register an application who is aged 16 years and over, unless they are subject to immigration control or excluded on the grounds of “unacceptable behaviour” (see **Section 4.4**), providing they are not already registered for housing on their own or on some else’s application.

4.2.3 Persons under the age of 16 years will be considered on an individual basis depending on their personal and housing circumstances, provided that:-

- They have not already made an application or are included as an applicant on someone else’s application.
- Tai Tarian is satisfied that they have the sufficient capacity to understand the rights and obligations required of them to occupy a property let by Tai Tarian.

4.2.4 If an applicant is aged under 18 years they cannot legally hold a tenancy. In such cases, the legal tenancy will be held on trust for the minor, until they reach 18 years. When RHWA 2016 applies, an applicant under the age of 18 years cannot be granted an occupational contract and will need to be granted a licence or a tenancy held in trust.

4.2.5 If a joint application is made by two persons, one of which is under 18 years then the legal tenancy will be held on trust by the applicant aged over 18 years until the other applicant reaches 18 years, when they can legally become the joint tenant. This will also be the position under RHWA 2016 with occupational contracts.

4.2.6 All 16 and 17 year old lone parents who cannot live with their parents, carer or partner and who are allocated housing under this policy, shall be assessed to ascertain if they need accommodation with support. Tai Tarian will liaise with parents or carers and the relevant support agencies to ensure an appropriate support package and plan is in place before any offer of accommodation is made. Tai Tarian will require support agencies to provide evidence of the assessment and the support package which is in place.

4.2.7 Under Section 166 of the HA 1996, all applications must be considered. An applicant who is subject to immigration control can make an application for housing but any application must be rejected because Section 160A of the HA 1996.

4.2.8 Section 160A of the HA 1996 states that a Local Housing Authority shall only allocate housing accommodation to people who are eligible to join the scheme. The following persons are not eligible to join the Housing Register:-

- Persons from abroad who are subject to immigration control and not re-included by regulations. Further guidance is included at **Appendix 1**.
- Any other person as prescribed by the Welsh Ministers.
- Where an applicant or a member of the household is considered to be guilty of unacceptable behaviour which is serious enough to make them unsuitable to be a tenant and at the time of their application for housing and they are still considered unsuitable to be a tenant due to that behaviour (see **Section 4.4**).

Note that the above immigration eligibility rules do not affect the eligibility of a person who is already:-

- A secure or introductory tenant.
- An assured tenant of housing accommodation allocated to him by a Local Housing Authority in Wales.
- When operational, a contract holder under the RHWA of a property owned by a RSL or local authority.

Such applicants will be eligible regardless of their immigration status.

4.2.9 Any application by a person subject to the Asylum and Immigration Act 1996 (or any succeeding legislation) shall be assessed in accordance with the provisions of that Act.

4.2.10 Social Housing tenants (those who have an existing tenancy with any local authority or RSL or Registered Provider in England) within the household making the application must be registered as either the applicant or a joint applicant, so that when a new tenancy is accepted their existing home will be vacated.

4.3 **Making an Application for Housing**

4.3.1 All applicants shall be required to register an interest in applying for accommodation by following the instructions on how to apply on Tai Tarian's website (www.taitarian.co.uk). If the applicant is not considered eligible at this stage an application will not be deemed to be "live". This means the application will not proceed to the assessment stage but will be put on hold until it is considered eligible. Information on personal circumstances may then be verified and they shall be informed of the likelihood of their being accommodated in the near future.

- 4.3.2 Advice and assistance is available for anyone who experiences a difficulty in applying for housing, including applicants who are digitally excluded or vulnerable.
- 4.3.3 Applicants shall be informed if they are required to provide certain information to Tai Tarian to determine how their application will proceed. In addition, checks shall be made with the appropriate sources to complete and/or verify the information provided such as credit checks.
- 4.3.4 A full assessment where required shall be undertaken using the most appropriate method. Applicants shall be informed that if their application is successful, they shall be required to pay rent in advance in accordance with the tenancy agreement at the start of the tenancy.
- 4.3.5 Translations of any forms and notes including translation and interpreting facilities shall be made available upon request from applicants.
- 4.3.6 Applicants may use correspondence addresses as detailed below:-
- **No Fixed Abode** – If an applicant is applying as “No Fixed Abode” (NFA) then they should provide a correspondence address if at all possible. This could for instance be the Housing Options Team or a support agency. If an applicant who is of NFA cannot provide a care of address as a correspondence address then they shall be asked to provide an e-mail address and/or telephone number, so that any communications to them can be made via those methods.
 - **‘Care of’ Correspondence Address** – We recognise that due to personal circumstances some applicants may wish to have all correspondence relating to their application sent to a different address other than the one at which they are residing. The applicant shall be required to provide the address and accommodation details of where they are residing as banding will be assessed on where the applicant is living.
- 4.3.7 At any stage during the application process Tai Tarian may undertake a pre-arranged visit to the applicant's current place of residence to verify the circumstances provided by the applicant in the application.
- 4.3.8 An applicant has the right to request a review, which includes those decisions relating to eligibility for or an offer of accommodation, the band and the property size category to which they have been allocated. See **Appendix 9** for further details.

4.4 Exclusions from the Housing Register

- 4.4.1 All applicants shall be assessed for their eligibility for inclusion on the Housing Register. This shall be considered taking into account their immigration status, as detailed above, past and present conduct and other relevant matters.

- 4.4.2 Persons subject to immigration control, under the Asylum and Immigration Act 1996 are statutorily excluded from accommodation unless they fall within certain exception categories (see **Appendix 1**).
- 4.4.3 An applicant may be excluded from the Housing Register as a result of unacceptable behaviour. If it is reasonable and proportionate to do so, we will take into account all relevant factors such as vulnerability, health and individual circumstances when making decisions on exclusion.
- 4.4.4 The only behaviour that may be regarded as unacceptable is defined as behaviour by an applicant or member of their household which would, if they were a secure tenant of a local authority, entitle the landlord to a possession order under any of the Grounds 1 to 7, Schedule 2 of the Housing Act 1985.
- 4.4.5 The procedure and principles to be applied in determining exclusion are set out in **Appendix 2**.
- 4.4.6 Subject to **Section 4.4.4** this policy allows for applicants or members of their prospective household to be registered on the Housing Register but their application **may not be considered 'live'** until such time as they have addressed current or past behavioural issues. The following criteria will apply where the applicant or a member of their prospective household has:-
- failed to maintain their current or any previous social rented or private sector rented property within the terms of their tenancy agreement; or
 - committed acts causing or likely to cause nuisance or annoyance to their neighbours or others in the locality of where they live or where they previously have lived.
- 4.4.7 In such instances as described in **Section 4.4.6** above, the applicant and members of their prospective household shall be informed of the action(s) that they will need to take before the application will be made 'live'. This may include co-operation over a period of time with support agencies, social services or other organisations where the express outcome is that there is a significant improvement in their conduct. Any action required to be undertaken must be reasonable and proportionate, and take into account the protected characteristics of the individual.
- 4.4.8 A Tai Tarian appointed person will decide whether sufficient action has been taken by the applicant to address the issue so that an offer of accommodation can be made. The status of the application shall be reconsidered when there is evidence that:-
- the applicant (or a member of their prospective household) has addressed their behaviour to the satisfaction of a Tai Tarian appointed person: and
 - there has been no cause for complaint against the applicant (or members of their prospective household) for a continuous period of 6 months from the point where action has been agreed with the applicant to address their or a

member of their prospective household's behaviour or other identified problems.

4.5 **Applications from Board Members, Staff or their Close Relatives**

4.5.1 The following persons may apply for accommodation under this scheme, subject to the limitation set out below:-

- a) An officer (which includes a Board Member) or employee of Tai Tarian.
- b) A person who at any time within the preceding twelve months has been a person within paragraph (a).
- c) A close relative (as defined in the Determination) of a person within paragraph (a) or (b).

On application they must declare their position within Tai Tarian, their employment with Tai Tarian or their relationship to a Tai Tarian employee.

4.5.2 On applying to join the Housing Register they will neither be advantaged nor disadvantaged as a result of their position or relationship.

4.5.3 If an applicant fulfils the above criteria their application shall be determined in accordance with this policy and in accordance with the Permitted Payments and Benefits (Wales) Determination 2010 (the **Determination**) and the Welsh Assembly Government's Circular RSL 005/10 (or under any amended version as appropriate, on permitted payments and benefits).

4.5.4 If such an applicant is to be made an offer of accommodation, approval must be sought from the Tai Tarian Schedule 1 and Membership Committee (acts in accordance with delegated authority from the Board) and for Board Members from the Welsh Government, prior to any accommodation being allocated to them.

4.6 **Incomplete Applications**

4.6.1 If an application has commenced and it is considered that further information is required and it has not been provided by the applicant within a reasonable period of time (28 days) from the request, Tai Tarian may decline to register the application and a new application may be required.

4.6.2 Applications may not be considered 'live' until all information requested has been provided by the applicant. Applicants will be asked to provide documentation which is reasonably required for the purpose of assessing their application and which they can reasonably be expected to provide.

4.6.3 Until an application has been deemed 'live' it will remain on the holding list and the applicant will not be eligible to bid for accommodation.

4.6.4 There may be occasions where an incomplete application can be made live. This will generally apply where an application is complete except for evidence

to substantiate an award of further priority. In such instances the application may be made live and the applicant placed in the appropriate band based on the information and documentation available at that time.

4.6.5 An award of further priority shall not be made until such a time as information is provided to substantiate that further priority.

4.6.6 If as a result of information given at the assessment stage a visit is required to the home of the applicant the application shall not be made 'live' until the satisfactory completion of the visit.

4.7 False or Withheld Information

4.7.1 If an applicant provides false or misleading information when their application is assessed they may be excluded from the Housing Register.

4.7.2 If it is found that an existing applicant who is already on the Housing Register has provided false or misleading information, they may be removed from the Housing Register and may be found ineligible for future applications.

4.7.3 Where there is a suspicion, or an allegation has been made that a person has either provided false or misleading information, or withheld information, the application shall be 'held' pending the outcome of the investigation into the application.

4.7.4 If the outcome of the investigation reveals that false or misleading information was not provided, or the withholding of information was found to be inadvertent, then the application will be re-instated from the date of entry into the band.

4.7.5 Where the investigation shows that false or misleading information was provided, or information deliberately withheld, then the application may be removed from the Housing Register and the applicant may be ineligible for future applications.

4.7.6 Ground 17 in Schedule 2 of the Housing Act 1988 enables Tai Tarian to seek possession of a property where it has been let as a result of a false statement made by either the tenant or a person acting at the tenant's instigation.

4.7.7 Under Section 171 of the HA 1996 a person commits an offence if, in connection with the exercise by a Local Housing Authority of their functions under this Part 6 of the Act:-

- They knowingly or recklessly makes a statement which is false in a material particular, or
- They knowingly withhold information which the Authority have reasonably required them to give in connection with the exercise of those functions

A person guilty of an offence under this Section is liable on summary conviction to a fine of up to £5,000.

4.8 **Deliberately Worsening Circumstances**

4.8.1 Applicants must not deliberately worsen their housing circumstances to gain greater priority under the scheme. Examples follow but this is not an exhaustive list.

Examples of this are:-

- *Applicants who have allowed family members or others to move into their property, who previously had suitable accommodation or the financial means to secure their own accommodation, and this has resulted in the property being overcrowded.*
- *Applicants who have moved from previously suitable or more suitable accommodation which it were reasonable for them to continue to occupy, into a less suitable property.*
- *Homeowners who have transferred their property to another family member within the last 5 years from the date they make their application to the Register.*
- *Giving up affordable and suitable private rented accommodation which they are able to maintain, to move in with other relatives or friends, creating a situation of overcrowding and/or sharing of bathroom/kitchen and/or a split household.*
- *Requesting or colluding with a landlord or family member to issue them with a Notice to Quit.*

4.8.2 Where Tai Tarian believes this to be the case the applicant shall be awarded the band that they would have been entitled to had they not worsened their housing circumstances.

4.8.3 The above applies to action by any person acting with the knowledge or consent of the applicant.

4.8.4 When assessing whether an applicant has deliberately worsened their housing circumstances, regard shall be made to whether the act giving entitlement to additional priority was justified and reasonable in all the circumstances of the case.

4.9 **Change in Circumstances**

4.9.1 It is the responsibility of the applicant to advise Tai Tarian of any change that may affect their housing application.

4.9.2 When a change in the applicant's circumstances results in the applicant moving into a different band their effective date will be in accordance with **Section 5.2.14.**

4.9.3 In some cases a change in circumstances may require a further assessment to be undertaken at which point the application shall be 'held' until the satisfactory completion of the new assessment.

4.10 **Applicants Who May Require Support**

4.10.1 Where an applicant may be unable to properly fulfil the terms of Tai Tarian's Tenancy Agreement or has specific high level support needs (due to vulnerability, specific support requirements or factors that relate to the application), an assessment shall be made of all the available information. This may include a needs assessment for specific accommodation such as Haven and/or a tenancy management assessment, as well as a capacity assessment.

4.10.2 Following consideration of the information a decision will be taken to, either:-

- Allow the application to proceed with no special conditions so that a bid can be made for any accommodation the applicant qualifies for.
- Allow the applicant to bid for properties but on the condition that an offer of accommodation will only be made where there is a commitment from the appropriate support agencies to provide a suitable support package and plan, and where the applicant accepts support including tenancy support/intensive management from the start of the tenancy.
- Allow the applicant to be considered for special accommodation that may only be found through supported housing and in certain areas allocated outside the Lettings Policy. This may involve referring the applicant to another organisation so that suitable accommodation can be considered.

4.11 **Local Connection**

4.11.1 Anyone living outside the Neath Port Talbot County Borough Council area (the **County Borough**) can apply to join the Housing Register subject to their eligibility. However, to meet local housing need, certain priority in terms of banding shall be given to persons who have a local connection to Neath Port Talbot.

4.11.2 For the purposes of the Lettings Policy a 'Local Connection' is defined as follows:-

- An applicant or a member of their household currently lives in the County Borough.
- An applicant or member of their household is employed within the County Borough. This refers to where they work and not where the employer's Head Office is located. Employment will only qualify under this section if it is permanent or long term work and for a minimum of 15 hours every week.
- An applicant or member of their household has a close relative (mother, father, brother, sister or adult child) who lives in the County Borough and has done so for the past five years on a continuous basis.

- The applicant has just been or is about to be discharged from the British Armed Forces and who lived in the County Borough immediately before joining the Armed Forces.
- The applicant has special circumstances, such as medical or support services that are only available in the County Borough. Cases of this nature are considered to have a local connection on exceptional grounds.
- Where the applicant is a serving member of the Armed Forces then they, and other persons who normally live with them as part of their household, do establish a local connection with the County Borough by virtue of serving, or having served, there while in the forces.

4.11.3 An applicant who applies under 'No Fixed Abode' will need to prove a local connection to the County Borough. If they cannot do this they will be placed in the Bronze Band.

4.11.4 Where an applicant (other than an applicant at risk of domestic abuse – as defined in Section 58 of the HWA) has no local connection to the County Borough they shall be placed in the Bronze Band. If an applicant has a health or welfare need which does not require a move solely to the County Borough they will remain in the Bronze Band and advised to contact their own Local Authority for assistance.

4.11.5 Where an applicant is assessed as at risk of domestic abuse (as defined in Section 58 of the HWA) and has no local connection to the County Borough they will be placed in the Urgent or Gold Band in accordance with the Council's duty under the HWA.

4.12 **Cancelling an Application**

An application may be cancelled for one or more reasons. Examples follow but this is not an exhaustive list.

- An applicant requests that their application is cancelled.
- An applicant accepts an allocation through the Lettings Policy.
- There is a change in the applicant's circumstances that makes them ineligible.
- An applicant fails to respond to a review of their application.
- An applicant is found guilty of providing false or misleading information that is serious enough to remove their application from the Housing Register.
- An applicant with a housing need who has not bid for suitable properties in their area of choice for 6 months or more.
- Applicants who bid or are subject to direct bids and who fail to respond to potential offers of accommodation (**Section 8.3**).
- Where the Council's Housing Options Team closes the application it must send its reasons for doing so to Tai Tarian.
- An applicant has been re-housed in a secure or assured (including a Starter Tenancy) (or occupational contract under the RHWA 2016) by another RSL in or outside the County Borough.
- An applicant who is already an RSL tenant has a mutual exchange.

- Where an applicant has been excluded under **Section 4.4.3** due to unreasonable behaviour and they have failed to respond to a review of their application or they have failed to provide evidence of a change in their behaviour which would allow for consideration of eligibility within a reasonable timescale.
- Where a decision has been made under **Section 4.4.2** that the applicant is ineligible on immigration grounds and they have not asked for a review of that decision within the time limit or they have asked for a review and the decision has been upheld upon review.

4.13 **Notification of Decision**

4.13.1 Following an assessment of their application, if deemed eligible for the scheme, the applicant shall be advised of the outcome which shall detail the following:-

- The band in which their application has been placed.
- Their applicant category, which demonstrates the size and type of accommodation they can bid for.
- Their chosen area/s.
- A unique reference number, which can be used for any contact.
- Any other relevant information.

4.13.2 If the applicant is deemed ineligible for the scheme then the applicant will be informed of the reason their application is considered ineligible.

4.13.3 Tai Tarian may, at any time (including after notification of the band and/or category) review the decision (irrespective of whether or not new information is available) and may, where the review concludes that the earlier decision was incorrect, amend the decision (including the decision on the band and/or category). If Tai Tarian does so, it will write to the applicant setting out its reasons for the change in the band or category.

4.13.4 An applicant has the right to request a review of various decisions as detailed in **Appendix 9** of this policy.

4.14 **Application Review**

4.14.1 There shall be a regular review of the Housing Register which includes a review on the anniversary of each application. This will help ensure applicants' positions within bandings are correct and bidding activity is appropriate. If an applicant fails to respond to the periodic review then their application may be cancelled. As part of the review process, we will ask the applicant to provide updated details about their circumstances which are relevant to their application. In addition, applicants' details are reviewed when bids are being considered and at the point of allocation.

4.14.2 Any change of circumstances, or where an applicant with a housing need has not bid for suitable properties in their area of choice for 6 months or more, may result in:-

- Them being placed into a different band.
- Another eligibility assessment.
- Their application being cancelled.

SECTION 5 – Assessment of Need

5.1 How an Application is Assessed

- 5.1.1 To assess applicants a needs based banding system shall be operated.
- 5.1.2 An applicant shall be placed in the band which reflects the level of their housing need, so the higher the housing need, the higher the band. This is based upon their lead need and not a cumulative number of housing needs.
- 5.1.3 The applicant shall be notified of their eligibility and also the band into which they have been placed according to their housing needs following the assessment of their application. Information shall be given on the size and type of accommodation for which the applicant will be considered depending on the number of people in their household. This will help the applicant assess the likelihood of when an offer of suitable accommodation may be made.
- 5.1.4 Consideration will be given to determining whether an applicant is unable to resolve their own housing need.
- The first stage is to identify an applicant's particular housing needs. Each applicant will have different housing needs of varying degrees. The procedures for assessing applications require that an applicant's identified housing needs are recorded on the assessment documentation.
 - The second stage is to assess whether the applicant can reasonably meet those housing needs themselves. Regard will be given to the applicant's financial ability to reasonably meet their own housing needs. Consideration will also be given to an applicant's age, health and other personal circumstances in order to establish if they are able to themselves meet their identified housing needs.
- 5.1.5 Financial assessments may be carried out at housing application stage to complete affordability checks and help ensure future tenancies are sustainable. Prior to any allocations being made, checklists for allocations and affordability are completed to assess applicants' ability to pay their housing costs. Consideration is also given to the housing costs of various property types which may be allocated. Where it is identified that applicants require assistance, benefits, budgeting and digital advice is offered to maximise income and help match applicants in terms of what they can afford to suitable property types.
- 5.1.6 An applicant has the right to be informed of any decision about the facts of their case and how those facts are to be taken into account when considering whether to allocate housing to them.

5.2 How Housing Need is Assessed

5.2.1 Eligible and qualifying applicants shall be placed in one of the following four bands in date order. The bands provide reasonable preference to those seeking assistance in accordance with Section 167(2) HA 1996.

5.2.2 Urgent Band – Urgent Housing Need

5.2.3 This band is for applicants who have an urgent housing need, who need immediate re-housing and who are unable to resolve their housing need on their own. Priority within the Urgent Band is determined in date order of entry into the Urgent Band and not by the original application date.

5.2.4 Applicants who are placed within the Urgent Band shall have their case reviewed after three months to ensure their circumstances still demonstrate an urgent housing need and that they are actively bidding for suitable available properties. A review shall also be undertaken of what properties have become available. This may result in either:-

- A direct let – usually for statutory homeless applicants living in temporary accommodation (see **Section 7.2**).
- Priority being maintained.
- Moving into a lower priority band if the circumstances under which they were placed in the Urgent Band no longer apply.

5.2.5 Gold Band – High Housing Need

5.2.6 This band is for applicants whose housing need is high and who are unable to resolve their housing need on their own. Subject to the 'Applicants Who Move Between Bands' section below, priority within the Gold Band is determined in date order of entry into the Gold Band and not by the original application date.

5.2.7 Silver Band – Medium Housing Need

5.2.8 This band is for applicants who have a medium housing need and are unable to resolve their housing need on their own. Subject to the 'Applicants Who Move Between Bands' section below, priority within the Silver Band is determined in date order of entry into the Silver Band and not by the original application date.

5.2.9 Applicants in the Silver Band will either have a lesser degree of reasonable preference than those applicants in the Gold Band or some other housing need.

5.2.10 Bronze Band – Low/No Housing Need

5.2.11 This band is for applicants with either:-

- Low housing need.

- No recognised housing need.
- With a housing need but no local connection as detailed in **Section 4.11**.

5.2.12 Due to the high demand for properties, applicants are unlikely to receive an offer of accommodation in many areas of the County Borough under this scheme. Priority within this band will be arranged in order of entry into the band.

5.2.13 **Appendix 3** of the policy contains detailed criteria for each of the bands.

5.2.14 **Applicants Who Move Between Bands**

5.2.15 Where an applicant's case is reviewed and they move downwards between bands then their date priority in the new band will be the original date of entry into the higher band.

5.2.16 Where the reason is due to a change in the housing applicant's circumstances which Tai Tarian has been notified of; their date priority in the lower band will be the original date of entry into the higher band.

5.2.17 When a change in the applicant's circumstances results in the applicant moving up a band, their effective date will be the date of the decision following notification of the change and not their original registration date.

5.3 **Discretion to award no priority or adjusted priority where applicant/household member has been guilty of unacceptable behaviour**

5.3.1 A Tai Tarian appointed person may, pursuant to Section 167(2C) of the HA 1996 decide not to award the reasonable preference band that an applicant would otherwise have been entitled to by reason of them falling within one or more of the categories in Section 167(2) if satisfied that:-

- The applicant, or a member of their household, has been guilty of unacceptable behaviour serious enough to make the applicant unsuitable to be a tenant of the authority, and
- In the circumstances at the time their case is considered, they deserve by reason of that behaviour not to be treated as a member of a group of people who are to be given preference by virtue of sub-section (2).

5.3.2 If the decision is to award, "no/adjusted priority" then it shall be communicated to the applicant, setting out the reasons for the decision together with information about their right to request a review of that decision. **Appendix 9** sets out the review procedures. See **Appendix 2** of the policy for more details about how an applicant may be awarded no priority or adjusted priority due to their previous unacceptable behaviour.

5.3.3. For homeless applicants who are owed certain duties by the Council's Housing Options Team, notification will also be sent to the Housing Options Team of

the intention to award no/adjusted priority to such applicants (see **Appendix 2** for full details)

5.4 **Applicant does not have a local connection but falls within Section 167(2)**

- 5.4.1 Applicants who fall within one or more of the five “reasonable preference categories” in Section 167(2) of the HA 1996 but who do not have a “local connection” with the County Borough shall be placed into the Bronze Band.
- 5.4.2 Applicants who are assessed as being at risk of domestic violence (as defined by Section 58 of the HWA) but do not have a local connection with the County Borough where the Council has accepted a statutory duty shall be placed into the Urgent or Gold Band.
- 5.4.3 There may be exceptional circumstances when it is not deemed appropriate to reduce priority to an applicant who would otherwise fall within one of the higher bands (Urgent, Gold, Silver) but who does not have a local connection with the County Borough. If exceptional circumstances exist, an applicant may be placed in one of the higher bands.

5.5 **Environmental Health Assessment**

- 5.5.1 The Council’s Environmental Health Department in accordance with their responsibilities for enforcing environmental health legislation, will where appropriate, conduct assessments for applicants relating to insanitary, overcrowded or unsatisfactory housing conditions (see **Appendix 8**).

SECTION 6 – Allocations Through Homes by Choice

- 6.1 Most Tai Tarian properties that are vacant and available for letting shall be let through the Homes by Choice Scheme. This scheme offers applicants choice by advertising vacant properties on a regular basis. However applicants need to be aware that if they do not accurately list their chosen areas, this may affect their ability to bid on a property in any Homes by Choice advertisement.
- 6.2 Any applicant who wishes to be considered for a property on the Homes by Choice Scheme shall be expected to submit a bid for that property in accordance with the process as outlined below.
- 6.3 All applicants on the Homes by Choice Scheme shall be placed in a band, based on their housing need as detailed in **Section 5** and the size of property that matches their household size (see **Appendix 4** for Property Size and Type of Property).
- 6.4 Applicants shall receive formal notification of their category, their chosen area/s and also the size and type of accommodation for which they can bid following the assessment of their application.
- 6.5 When a property is advertised as available through the Homes by Choice Scheme it will detail the category, size and type and which applicants can apply to bid for that property.
- 6.6 A property advertised through Homes by Choice may be withdrawn at any time at the discretion of Tai Tarian.
- 6.7 Applicants should be aware that available accommodation is limited in certain areas of the County Borough so that choice may be limited.
- 6.8 The Council wishes, as far as possible, to give choice to applicants seeking accommodation. However, giving choice must be set against the need for the Council to resolve some applicants' housing situation urgently; for example, where there is a homeless household to whom there is a statutory duty to provide housing or households at risk of violence. As a result, in certain circumstances choice may be limited.
- 6.9 For any applicant owed a homelessness duty under section 66, 73 or 75 of the HWA (or under Part 7 of the HA 1996 for applications made before 27 April 2015) the Council may make a direct bid (defined as bidding on their behalf or making a direct bid outside of the Homes by Choice Scheme) at any time and is not constrained by any time period to allow an applicant an opportunity to bid for accommodation. The offer of accommodation could be made in any area of the County Borough. The decision to make a direct bid could be where:-
 - An applicant is not being realistic in the areas and/or property size for which they are bidding and the temporary accommodation they may be occupying may be needed for another newly presenting homeless applicant.

- Any other financial or operational reasons whereby the Council needs to house households owed a homeless duty.
- 6.10 The Council will ask applicants owed a homelessness duty to state those areas where they believe they cannot live and account will be taken of such factors. Those households owed a homelessness duty under section 66, section 73, or section 75 of the HWA (or under Part 7 of the HA 1996 for applications made before 27 April 2015) or applicants who are considered homeless within the meaning of Part 2 of the HWA, will lose their priority status banding if the duty owed to them is ended due to the refusal of a suitable offer of accommodation.
- 6.11 As a result, unless they have another reason to be awarded the Urgent or Gold Band they will be moved to a lower band. The offer of suitable accommodation made will also bring to an end any statutory homeless duty and they shall be warned in writing of this consequence at the offer stage.
- 6.12 In certain areas of the County Borough where there is an issue of low demand, properties may be advertised for applicants who would under-occupy the accommodation. In this case Tai Tarian will carry out a detailed affordability assessment prior to letting the property and if affordability due to under-occupation is an issue the offer will not be made.
- 6.13 When placing a bid for a property the applicant should be mindful of the welfare benefit rules and should seek advice about the potential changes in benefit entitlement before they accept a tenancy.
- 6.14 An applicant can bid on suitable properties (see **Section 6.4**) as and when advertised. It is the responsibility of the applicant to submit their bid within the set timescales. Advice and assistance is available for applicants who experience a difficulty in applying to bid for a suitable property perhaps due to being digitally excluded or vulnerable.
- 6.15 Applicants should ensure that they only bid for properties that match their chosen area/s and property size criteria unless other categories have been included in the property advert as being applicable for their category. If they do not, their bid may be deemed ineligible. Unless Tai Tarian deem there are exceptional circumstances, an applicant's areas of choice, category or band cannot be changed during a Homes by Choice bidding period.
- 6.16 Where Tai Tarian considers that the property an applicant has bid for is unsuitable for any reason then the bid for that property shall not be accepted and the applicant will be advised accordingly. The applicant has a right to request a review of the reasons for refusal of a bid (see **Appendix 9** on reviews).
- 6.17 Once an applicant has been matched to a property and an offer made and accepted they will not be eligible to bid for another property unless allowed to do so as a result of exceptional circumstances.

- 6.18 Applicants who are Tai Tarian tenants (transfer cases) assessed as having no housing need and not meeting the transfer criteria will not be allowed to bid unless Tai Tarian considers exceptional circumstances exist and it allows the applicant to bid.
- 6.19 An offer under the Homes by Choice Scheme will be made to the applicant in the greatest need as defined within the banding system in date order according to the size and type of accommodation that meets their household needs (subject to management discretion in **Section 7** to place an applicant into an appropriate band).
- 6.20 Tai Tarian reserves the right not to make or to withdraw an offer of accommodation.
- 6.21 Tai Tarian may review the decision to place an applicant in a particular band or category at any time (including after the applicant has bid for a property) and may amend its previous decisions on banding or category placements.

SECTION 7 – Allocations Outside Homes by Choice

7.1 Decisions which can be made

7.1.1 In the cases listed in **Section 7**, a decision may be made to either:-

- a) Make an offer of a specific property to the applicant outside of the Homes by Choice Scheme; or
- b) Award the applicant whatever banding priority is appropriate in the circumstances of the case. This can include either placing the applicant at the top of the awarded band or simply placing them into a band (in which case they will be considered in date order priority in the usual way); or
- c) Not to support a case or to defer/hold a case until further information is received.

7.1.2 Applicants awarded priority through management discretion under this section will be made one reasonable offer of accommodation only, taking into consideration the needs of the applicant. An unreasonable refusal of the offer will result in the preferences being removed and the applicant being returned to their original place on the Housing Register, subject to the criteria relating to refusal of offers.

7.1.3 Cases listed in **Sections 7.2 and 7.3** shall be considered outside the Homes by Choice Scheme by the appropriate Manager and/or Head of Service/Director of Housing. All other cases listed in **Section 7** shall be considered outside the Homes by Choice Scheme by the appropriate Team Leader. Also where appropriate, those cases which require multi service input may be considered by Tai Tarian appointed person/s.

7.2 Exceptional Circumstances

7.2.1 In some cases due to vulnerability of the applicant or where their circumstances are of a sensitive nature then, either with the recommendation of a Tai Tarian Manager, Head of Service or Director, or equivalent Senior Officer from a specific agency, such as Housing Options/Social Services/Police/Probation Service/Health Authority; it may be decided by Tai Tarian that it is in the best interests of the individual and/or community that an allocation under this section shall be made.

7.2.2 The Council can request Tai Tarian to exercise this discretion regarding an applicant. If a request is made, Tai Tarian will give due consideration to the request but the decision on allocation rests with Tai Tarian.

7.3 Serious Offenders

7.3.1 It may be necessary to provide housing to offenders to minimise the risk to the community and the applicant, where supervision of the individual can be

maintained. This may also apply to individuals currently living in the community who are considered to pose a risk to themselves **and/or** others, although they may not have been convicted of any offence.

7.3.2 We will work with the Police and Probation Services to assess and manage risk and will apply special arrangements where cases are referred through the Multi-Agency Public Protection Arrangements (MAPPA). A planned and managed re-location of offenders shall be agreed and shall include a full discussion on housing options, which are most appropriate to the applicant's circumstances and supervision needs.

7.3.3 The above may result in restrictions being placed upon the applicant in their choice of property **and/or** area. This may mean a direct allocation of suitable accommodation outside the Homes by Choice Scheme.

7.4 No Demand for a Property

7.4.1 Following an assessment of any applicants' details, and even though advertised to applicants who would under-occupy the accommodation, there may be occasions where although a property has been advertised through the Homes by Choice Scheme it does not attract any eligible 'bids'. When this occurs Tai Tarian will consider an expression of interest either directly from the Housing Options Team or from a potential applicant eligible for the Scheme. Only if there is no suitable applicant identified by the Housing Options Team within 24 hours, will expressions of interest from other applicants be considered. Such properties will be advertised and offered on a first come, first served basis.

7.5 Request for Sole / Joint Tenancy

7.5.1 At the request of the former joint tenant following the termination/surrender of the joint tenancy by one or both joint tenants, an allocation of a new sole tenancy may be made where that property is still appropriate to the needs of the household.

7.5.2 Where a sole tenant requests that a joint tenancy is created between that person and their partner and the property meets the needs of the household. Requests to create a joint tenancy with a family member will only be considered in exceptional circumstances.

7.5.3 Where a sole tenant requests that their tenancy is allocated to a person who resides with them as a new sole tenant, an allocation of a new sole tenancy may be made where the property meets the needs of the new household.

7.6 Decanting Tenants

7.6.1 Tai Tarian tenants may in certain circumstances be required to vacate their home in order that major works or re-development can take place.

- 7.6.2 If this causes the original home to no longer exist, or it is otherwise not possible to return the tenant to the original home, this will be dealt with as a permanent move to a new property on exceptional grounds. This may be considered as an allocation outside the scheme.
- 7.6.3 If the property is undergoing major refurbishment and the tenant is required to move out on a temporary basis to allow the works to take place, the decant will be temporary and as such will not be counted as an allocation under this scheme.
- 7.6.4 In exceptional circumstances a tenant whose property is undergoing major works and would return but requests a permanent move to a new property on exceptional grounds as identified. This may be considered as an allocation outside the scheme.

7.7 Termination of Tenancy

- 7.7.1 Where a tenant or joint tenants have given notice to quit their tenancy and then sought to withdraw that notice to quit and the withdrawal is agreed by Tai Tarian they may be dealt with under **Section 7** of the scheme.

7.8 Request for Succession of a Tenancy

- 7.8.1 Tai Tarian may decide to treat an applicant as a 'special case' where the following applies:-
- Where there would be a right for the applicant to succeed to a tenancy but that right has already been exercised (up to a maximum permitted number of 2).
 - Where the applicant has resided at their existing property for many years but they do not have a right to succeed under the Tenancy Agreement.
 - Where there has been a succession to the tenancy but the property is under-occupied and Tai Tarian wishes to make an offer of suitable alternative accommodation in accordance with the Tenancy Agreement provisions and Tai Tarian's procedure on succession.

7.9 Transfers

- 7.9.1 Consideration will be given to exceptional cases where tenants do not meet the transfer criteria as set out in **Section 8**.

7.10 Adapted Disabled Accommodation

- 7.10.1 Tai Tarian is committed to addressing the housing needs of disabled applicants and/or other disabled persons within the household who are primarily resident with the applicant but we have a limited stock of adapted accommodation to achieve this. Offers of adapted accommodation will therefore be made outside the Homes by Choice Scheme after being identified as suitable for that applicant.

- 7.10.2 This will allow Tai Tarian to match an individual applicant's disability to the adaptations undertaken in the property, so as to allocate the limited stock in the best way.
- 7.10.3 Following the assessment of the application, where it is identified that the applicant has specific requirements for an adapted property then the applicant may be required to provide an assessment from an Occupational Therapist or other similar professional person, which details the requirements of the disabled person.
- 7.10.4 Tai Tarian will establish set criteria for assessing both the applicant and the property and retain a separate list of applicants suitable to be considered for adapted accommodation (see **Appendix 5**). Tai Tarian may, at any time, review the decision that the applicant requires adapted accommodation.
- 7.10.5 In such cases, under-occupation of a property may be accepted where the applicant is the person best matched to that particular property.
- 7.10.6 Applicants considered for adapted accommodation shall be offered a choice of areas when their application is assessed. To help them secure adapted accommodation they will be encouraged to broaden their choice of areas if at all possible. However they will only be offered a property where they have specified that area as one of their areas of choice. This may mean that some applicants will have to wait longer to be re-housed.
- 7.10.7 Once an offer has been made it will be subject to the same conditions afforded to offers through the Homes by Choice Scheme.
- 7.10.8 Applicants who are considered for adapted properties will still be eligible for the Homes by Choice Scheme but any bid for a property will be subject to the rules in **Section 6**.
- 7.10.9 To best meet the needs of disabled applicants Tai Tarian may share information with other housing providers who offer ADAPT or a similar service to identify suitable accommodation for the applicant. Applicants will be required to confirm an express consent to such sharing of their information with other providers when they submit an application.
- 7.10.10 If Tai Tarian is unable to allocate an adapted property via this section we will advertise and allocate the property through the Homes by Choice Scheme in accordance with **Section 6**.
- 7.10.11 Tai Tarian may, at any time (including after notification of the need for adapted accommodation) review the decision (irrespective of whether or not new information is available) and may, where the review concludes that the earlier decision was incorrect, amend the decision. If Tai Tarian does so, it will write to the applicant setting out its reasons for the change in the band or category. See **Appendix 9, Section 9.1.1** for examples of decisions.

7.11 Older Persons' Extra Care Housing

7.11.1 Older Persons' Extra Care Housing are properties for older people where additional support services are provided. Tai Tarian does not own or manage Older Persons' Extra Care Housing. Allocations and monitoring arrangements shall be in line with the nominations agreement for Older Persons' Extra Care Housing established between the Council and the appropriate RSL.

7.12 Supported Housing

7.12.1 Some properties will be designated as supported accommodation units which are suitable for applicants with identified support needs, with the support element provided either directly by Tai Tarian or by a third party agency according to the terms of the Personal Housing Plan for the applicant.

7.12.2 These supported accommodation units shall be either allocated through the Homes by Choice Scheme as suitable for Category S applicants (applicants who require supported accommodation) in accordance with the Lettings Policy, or be considered as an allocation outside the Homes by Choice Scheme as a direct allocation where there is an exceptional circumstance as determined in **Section 7** of the Lettings Policy.

7.13 Sensitive Lettings (individual properties)

7.13.1 An individual property may be a 'sensitive let' outside the Homes by Choice Scheme. This could be where there is a confirmed history of anti-social behaviour or criminal activity at that property involving the previous tenant or members of their household. A property will only be designated a sensitive let with the approval of a Tai Tarian appointed person and they will be considered on a case by case basis. If a property is a sensitive let, certain households shall not be considered for that property. Once the property has been let it will no longer be classed as a sensitive let. All sensitive lettings will be subject to monitoring in accordance with **Section 10**.

SECTION 8 – Offers and Refusals

8.1 Offer of Accommodation

- 8.1.1 The applicant with the earliest date order within the appropriate advertised band shall normally be offered a suitable property. At the offer stage, applicants shall be reminded that rent in advance in accordance with the tenancy agreement is required should they accept the offer. This is subject to the proviso that successful bidders (for example those who get an offer of a property) shall only be made one offer per Homes by Choice period.
- 8.1.2 Once an applicant has received an offer of accommodation within a Homes by Choice period, they will not receive any further offers of accommodation within the same Homes by Choice period even if they are well positioned for other properties for which they may have bid.
- 8.1.3 Tai Tarian reserves the right not to make/to withdraw any offer or to offer applicants readily available properties in specific areas/properties which come within the remit of local lettings policies and sensitive lets, subject to any further investigations undertaken.
- 8.1.4 No offer shall be made to the following applicants:-
- Applicants who do not meet all eligibility criteria, have not provided all required evidence in support of their application and/or are not able to sustain a tenancy to the satisfaction of Tai Tarian. If an offer has already been made and such circumstances come to light, Tai Tarian reserve the right to withdraw the offer. In terms of being able to sustain a tenancy this includes those not deemed to have capacity to fulfil the terms of a tenancy or who have high support needs which would be best met by a form of supported accommodation.
 - An applicant who is deemed to not be able to afford the housing costs (also refer to **Section 5** - assessment of need and ability to pay).
 - An applicant with former tenant debt owed to Tai Tarian, which has not been repaid or where appropriate arrangements to repay have either not been made or, having been made have not been maintained.
 - Applicants who are already Tai Tarian tenants, who shall be subject to further requirements as detailed in **Section 8.2**.

8.2 Transfers

- 8.2.1 Tai Tarian tenants seeking a transfer can access the Housing Register but they shall not be offered a property unless they have a housing need and meet the transfer criteria. However, offers may be made where Tai Tarian deem there to be exceptional circumstances. The transfer criteria are:-
- Have occupied their current property for 12 months.
 - Existing property has to meet the interior and external standards acceptable to Tai Tarian.

- A clear rent account and no debt owed to Tai Tarian (unless supported due to bedroom tax or Tai Tarian deem there to be exceptional circumstances). If on occasion payments have been missed, the rent account must have been brought up to date soon after. Also refer to **Section 5** - assessment of need and ability to pay.
- A clear rent account must be established through an established payment plan, with any agreement only becoming valid when actual payments are made as per the agreement. Payments must be made to the satisfaction of Tai Tarian. An application shall not be made 'live' until payments as per the agreement are made.
- They have registered on Homeswapper.
- Any alleged anti-social behaviour or other tenancy breaches at the investigative stage have been fully considered and satisfactorily resolved. This requirement has to have been met before an assessment for a transfer can be finalised.

8.2.2 Tai Tarian will not hold open an offer whilst tenants seeking a transfer remedy a breach of their current tenancy agreement. However, Tai Tarian will facilitate the provision of a plan to provide the tenant with any help and support they need to remedy the breach. Until such a time the application shall not be 'live'.

8.3 Timescales for Considering Offers of Accommodation and Viewings

- 8.3.1 An applicant who is made an offer of accommodation has 2 working days within which to contact the specified person from Tai Tarian to arrange a viewing of the property. Every effort shall be made to initially make a verbal offer or make an offer using the applicants' preferred communication method.
- 8.3.2 This period of 2 working days shall start to run from midnight on the day after the offer of accommodation is made. The Council's Housing Options Team shall also receive notification for their cases via their generic e-mail address facility.
- 8.3.3 Following the viewing, a further 2 working days shall be given in which the applicant can either accept or refuse the offer. This period of 2 working days shall start to run from midnight on the day of the viewing of the property.
- 8.3.4 In exceptional circumstances, these timescales may be extended at the discretion of Tai Tarian, for example, when dealing with vulnerable clients, or for other exceptional reasons.
- 8.3.5 If after the period 2 working days referred to in **Section 8.3.3** (or such other period as may be agreed by Tai Tarian) the applicant has not accepted or rejected the offer, the applicant shall be deemed to have refused the offer. The offer of accommodation shall be withdrawn at this stage. Where there are exceptional circumstances the applicant's application may be held for 28 days prior to any cancellation.

8.4 Homeless Applicants

- 8.4.1 In accordance with this policy, where the offer being made to the homeless applicant is a 'final offer' for the purpose of Section 75 of the HWA (or section 193(7) of the Housing Act 1996 for applications made before 27 April 2015) then the offer shall state that it is a final offer for the purpose of that section. Such an offer shall also inform the homeless applicant of the right to request a review of the suitability of that accommodation within a period of 21 days of the offer being made. A refusal to accept such an offer may result in the Council's duties to the homeless applicant under section 75 of the HWA 2014 being discharged pursuant to Section 76(3) (or its duties to the homeless applicant under section 193(7) of the HA 1996 being discharged pursuant to section 193(7)).
- 8.4.2 Reference is made to the provisions in chapter 2 of the HWA regarding discharge of duties to homeless applicants under Section 76 of the HWA and regarding the statutory rights of homeless applicants to ask for a review of the suitability of accommodation offered to them, and also of the discharge of duties owed to them under Section 85. For applications made before 27 April 2015, reference is made to the provisions in Part 7 of the HA 1996 and to section 193.

8.5 Accepting an Offer of Accommodation

- 8.5.1 Once an offer of accommodation has been accepted the applicant shall be removed from the Housing Register.
- 8.5.2 Should the applicant accept an offer and sign a tenancy agreement for the premises but then decide that they wish to terminate the tenancy, the applicant will be required to give at least 4 weeks' notice to end their tenancy and pay the rent that will be due. Discretion may be applied in exceptional circumstances. The applicant can request admission on the Housing Register as a new applicant, though the applicant's housing need shall be reassessed because it will be a new application.

8.6 Refusal of an Offer

- 8.6.1 Applicants may only be provided with one suitable offer of accommodation through the Choice Based Letting Scheme. Where an applicant refuses (or is deemed to have refused) an offer of accommodation their application may be placed on the holding list for a period of 3, 6 or 12 months dependent upon their previous bidding history. Upon any such decision to place an application on the holding list, the applicant shall be re-assessed at the end of the held period and put into the appropriate band.
- 8.6.2 The Council's Housing Options Team will decide what further action shall be taken where applicants who are statutorily homeless refuse a final offer of suitable accommodation. This may involve a decision to discharge any further duty to assist an applicant under homelessness legislation and termination of their temporary accommodation where this has been provided.

SECTION 9 – Nominating Individuals to Properties

- 9.1 The Council and Tai Tarian have agreed the nomination rights arrangements which apply when the Homes by Choice Scheme is not in operation or when Tai Tarian ceases to participate in such a scheme. The nomination rights arrangements are set out in Schedule 2 to the Transfer Agreement between the Council and Tai Tarian entered into (on or around 14 February 2011).
- 9.2 Agreements are in place with other RSLs operating in the County Borough that allows the Council's Housing Options Team to nominate individuals to an agreed percentage of the RSLs vacant dwellings.
- 9.3 The Council's nominations' entitlement is higher for certain schemes/developments. These are generally schemes/developments of a specialist nature such as extra care and where this is the case, they are subject to a scheme/development specific agreement. These shall be dealt with by way of separate nomination agreements independent from this policy between the Council and the relevant RSL.
- 9.4 Where a RSL has a new scheme/development in which the Council has a right to nominate to an agreed percentage of vacant dwellings according to the particular agreement, it will be advertised in accordance with the Homes by Choice Scheme, where applicants will be invited to submit a bid for that particular scheme/development.
- 9.5 Any person who wishes to be nominated to an RSL vacancy should indicate this when they apply for housing and identify the areas of the County Borough area where they would consider living.
- 9.6 All nominations requested on an 'ad hoc' basis shall be operated through the Housing Options Team to prevent homelessness and/or discharge its statutory duty to accepted homeless households. Should the Housing Options Team be unable to provide a suitable nominee, an eligible applicant on the Register operated in accordance with this policy shall be nominated.
- 9.7 An applicant who wishes to be nominated and then refuses a subsequent offer made by the RSL shall be subject to the same refusal rules which apply if they were offered a Tai Tarian' property (see **Section 8**).
- 9.8 The criteria for acceptance and priority for housing in this Lettings Policy apply solely to the letting of Tai Tarian accommodation. Other RSLs set their own criteria, which may be significantly different to this policy. In determining whether an offer of accommodation is to be made to an applicant nominated to an RSL, the RSL will have regard to its own Lettings Policy as set out in their nominations agreements with the Council.

SECTION 10 – Monitoring and Reviewing the Lettings Policy

10.1 Monitoring of the Policy

10.1.1 The implementation of this policy will be jointly monitored by the Council and Tai Tarian on a regular basis to ensure that it remains up to date and continues to meet the needs of individuals requiring accommodation in the County Borough, complies with current law and that it does not impact unfairly and disproportionately upon persons sharing any recognised characteristic.

10.1.2 Any information collected as part of the monitoring process will also be used by the Council as an “enabler” in the development of local housing strategy to provide wider re-housing opportunities. This will also assist Tai Tarian to identify potential development needs.

10.2 How Revisions to the Policy Will Be Managed

10.2.1 This policy shall be reviewed periodically to reflect best practice principles and address any changes in legislation or legal decisions. The Council and Tai Tarian will hold a joint review of this policy at least every five years or sooner if requested by one of the parties in writing or where there are changes in legislation, regulations or Welsh Ministers' guidance which materially affects the operation of this policy. In the latter case, the parties may agree to review only those sections of this policy affected by the changes in law, regulation or guidance.

10.2.2 It may also be necessary to make amendments to ensure that the policy is effective, efficient and that any procedures allow the policy to operate as envisaged. Any amendments shall be agreed by the Council and Tai Tarian before being implemented. They shall be documented in writing and made available on request.

10.2.3 Under s.167(7) of the HA 1996, before adopting or altering an existing Allocation Policy, the Council and Tai Tarian will:-

- Send a copy of the draft scheme, or proposed alteration, to every housing association with which they have nomination arrangements; and
- Ensure that those housing associations have a reasonable opportunity to comment on the proposals.

10.2.4 Tai Tarian may, if it considers it necessary and with the agreement of the appropriate Council officers, amend **Section 6** of this policy whenever necessary to ensure that the procedure set out in **Section 6** is consistent with its applications process for allocations through Homes by Choice as used by Tai Tarian from time to time. For the avoidance of doubt, this includes changes which become necessary following Tai Tarian's implementation of its new online application process and any future developments or upgrades to this system. Tai Tarian will notify the Council in advance of any changes being implemented and full details will be provided on Tai Tarian's website.

10.2.5 In order to ensure the effectiveness of this policy and compliance with the relevant equality duties the Council and Tai Tarian will periodically monitor information about who is applying for and being allocated social housing.

10.2.6 The Council and Tai Tarian will use this information as a basis for policy review and development and to help establish whether identified outcomes are in-line with this policy's objectives.

10.3 **Termination**

10.3.1 Should either the Council or Tai Tarian decide to withdraw from the Homes by Choice Scheme or this Lettings Policy then the Nomination Rights Agreement set out in Schedule 2 of the Transfer Agreement shall apply in its place.

APPENDIX 1 - IMMIGRATION ELIGIBILITY

The following applicants are to be regarded as eligible regardless of their immigration status (though they may still be regarded as ineligible due to their previous “unreasonable behaviour” or other relevant circumstances:

- A Secure or Introductory tenant.
- An Assured Tenant of housing accommodation allocated by a Local Housing Authority.

Note. This will apply to secure occupational contracts under the RHWA when operational.

Persons Subject to Immigration Control

Persons subject to immigration control, under the Asylum and Immigration Act 1996, are statutorily ineligible for an offer of accommodation unless they fall within the following 8 Categories prescribed by the Allocation of Housing and Homelessness (Eligibility) (Wales) Regulations 2014 (as amended by the Allocation of Housing and Homelessness (Eligibility) (Wales) (Amendment) Regulations 2017, Allocation of Housing and Homelessness (Eligibility) (Wales) (Amendment) Regulations 2019 and Allocation of Housing and Homelessness (Eligibility) (Wales) (Amendment) (No 2) Regulations 2019).

- **Class A** – a person recorded by the Secretary of State as a refugee within the Convention relating to the Status of Refugees done at Geneva on 28th July 1951.

- **Class B** – a person:-

Who has been granted by the Secretary of State exceptional leave to enter or remain in the United Kingdom outside the provision of the immigration rules; and

Whose leave is not subject to a condition requiring them to maintain and accommodate themselves and any person who is dependent on them, without recourse to public funds.

- **Class C** – a person who has current leave to enter or remain in the United Kingdom, the Channel Islands, the Isle of Man or the Republic of Ireland and whose leave to enter or remain in the United Kingdom is not subject to any limitation or condition **other than** a person:-

Who has been given leave to enter or remain in the United Kingdom upon an undertaking given by another person (that person’s “sponsor”) in writing in pursuance of the immigration rules to be responsible for that person’s maintenance and accommodation; and

Who has been resident in the United Kingdom, the Channel Islands, the Isle of Man or the Republic of Ireland for less than five years beginning on the date of entry or the date on which the above mentioned undertaking was given in respect of that person, whichever date is the later; and

Whose sponsor or, where is more than one sponsor, at least one of those sponsors, is still alive.

- **Class D** – a person who has humanitarian protection granted under the Immigration Rules.
- **Class F** - a person who is habitually resident in the United Kingdom, the Channel Islands, the Isle of Man or the Republic of Ireland and who has limited leave to enter the United Kingdom as a relevant Afghan citizen under paragraph 276BA1 of the Immigration Rules.
- **Class G** - a person who has limited leave to enter or remain in the United Kingdom on family or private life grounds under Article 8 of the Human Rights Convention, such leave granted under paragraph 276BE(1), paragraph 276DG or Appendix FM of the Immigration Rules, and who is not subject to a condition requiring that person to maintain and accommodate themselves, and any person who is dependent on that person, without recourse to public funds.
- **Class H** – a person who is habitually resident in the United Kingdom, the Channel Islands, the Isle of Man or the Republic of Ireland and who has been relocated to the United Kingdom under section 67 of the Immigration Act 2016 and has limited leave to remain under paragraph 352ZH of the immigration rules.
- **Class I** – a person who is habitually resident in the United Kingdom, the Channel Islands, the Isle of Man or the Republic of Ireland and has Calais Leave to remain under paragraph 352J of the immigration rules.

Persons not Subject to Immigration Control

- A person who is not subject to immigration control is to be treated as a person from abroad who is ineligible for an allocation of housing accommodation under Part 6 of the 1996 Act if:-
 - (a) subject to paragraph (2) below, the person is not habitually resident in the United Kingdom, the Channel Islands, the Isle of Man, or the Republic of Ireland; or
 - (b) the person's only right to reside in the United Kingdom:-
 - (i) is derived from the person's status as a jobseeker or a family member of a jobseeker; or
 - (ii) is an initial right to reside for a period not exceeding three months under regulation 13 of the EEA Regulations; or
 - (iii) is a derivative right to reside to which the person is entitled under regulation 16(1) of the EEA Regulations, but only in a case where the right exists under that regulation because the applicant satisfies the criteria in regulation 16(5) of those Regulations; or

- (c) the person's only right to reside in the Channel Islands, the Isle of Man or the Republic of Ireland is a right equivalent to one of those mentioned in sub-paragraph (b)(i),(ii) or (iii); or
- (1) For the purposes of determining whether the only right to reside that a person has is of a kind mentioned in paragraph (1)(b) or (c), a right to reside by virtue of having been granted:-
- (a) limited leave to enter or remain in the United Kingdom under the Immigration Act 1971 by virtue of Appendix EU to the immigration rules; or
- (b) leave to enter the United Kingdom by virtue of an entry clearance that was granted under Appendix EU (Family Permit) to the immigration rules, is to be disregarded.
- (2) The following are not to be treated as persons from abroad who are ineligible for an allocation of housing accommodation pursuant to paragraph (1)(a):-
- (a) a worker;
- (b) a self-employed person;
- (c) a person who is treated as a worker for the purpose of the definition of "qualified person" in regulation 6(1) of the EEA Regulations pursuant to regulation 5 of the Accession Regulations 2013 (right of residence of an accession State national subject to worker authorisation);
- (d) a person who is the family member of a person specified in sub-paragraphs (a) – (c);
- (e) a person with a right to reside permanently in the United Kingdom by virtue of regulation 15(1)(c), (d) or (e) of the EEA Regulations; and
- (f) a person who is in the United Kingdom as a result of the person's deportation, expulsion or other removal by compulsion of law from another country to the United Kingdom.
- (g) a frontier worker; and
- (h) a person who is a family member of a person specified in sub-paragraph (g); and has a right to reside by virtue of having been granted limited leave to enter or remain in the United Kingdom under the Immigration Act 1971 by virtue of Appendix EU to the immigration rules made under section 3 of that Act.

Also, changes to the immigration rules now effectively confer a derivative right to apply for housing for the primary carer of a British citizen (who will usually be a child) who is residing in the United Kingdom and where the denial of such a right of residence would prevent the British citizen from being able to reside in the United Kingdom.

Eligibility of EEA nationals

Under The Citizens' Rights (Application Deadline and Temporary Protection) (EU Exit) Regulations 2020, EEA nationals who resided lawfully in the UK up until 31 December 2020 will retain their existing eligibility under the Allocation of Housing and Homelessness (Eligibility) (Wales) Regulations 2014 (as amended) until 30 June 2021 (the 'grace period').

After 30 June 2021, EEA nationals who had resided lawfully in the UK up until 31 December 2020 and who:-

1. have applied to the EU Settlement Scheme and are waiting on a decision as to their status;
2. have pre-settled status under the EU Settlement Scheme; or
3. meet the definition of a frontier worker,

will be treated as 'persons not subject to immigration control', and their eligibility will be determined in accordance with Allocation of Housing and Homelessness (Eligibility) (Wales) Regulations 2014 (as amended).

After 30 June 2021, EEA nationals who had resided lawfully in the UK up until 31 December 2020 and who have settled status under the EU Settlement Scheme will be eligible.

Any other EEA national will only be eligible if they fall within another category of person subject to immigration control who are eligible.

The Habitual Residency Test

Habitual residence is usually used to determine eligibility for certain social security benefits or housing assistance from a local authority.

The Habitual Residence Test (HRT) is a test to decide if an individual normally lives in the United Kingdom, the Channel Islands, the Republic of Ireland or the Isle of Man. You can be subject to the HRT if an individual has been absent from the UK and is applying for housing assistance from a local Authority or for benefits such as Pension Credit, Housing Benefit, or Council Tax Reduction Scheme. There is no legal definition of what habitual residence actually is, nor how long an individual may need to have been in the UK to establish habitual residence.

It can take a period of a few days up to six months to satisfy the HRT. A decision maker looks at how strong the individual's 'settled intention' to remain here is and assesses whether an 'appreciable period' of time has passed in making a decision about the HRT.

APPENDIX 2 - EXCLUSIONS/NO PRIORITY/ADJUSTED PRIORITY FOR UNACCEPTABLE BEHAVIOUR

Section 4.4 of the scheme sets out a summary of the grounds upon which an applicant may be excluded for unreasonable behaviour.

Under s.160A(7) of the HA 1996, a local authority may, where it is satisfied that an applicant (or a member of the applicant's household) is guilty of unacceptable behaviour serious enough to make him or her unsuitable to be a tenant of the local authority, decide to treat the applicant as ineligible for an allocation.

Even if we are satisfied that an applicant is unsuitable to be a tenant, instead of deciding that he or she is ineligible for an allocation, we may instead proceed with the application and decide to give the applicant no priority/adjusted priority for an allocation under Section 167(2B) so that the band that they are put into is lower than they would otherwise be entitled to.

Section 160A (8) of the HA 1996 provides that the only behaviour which can be regarded as unacceptable for these purposes is behaviour by the applicant or by a member of his or her household that would – if the applicant had been a secure tenant of the local authority at the time – have entitled the local authority to a possession order under s.84 of the Housing Act 1985 in relation to any of the discretionary grounds in Part 1 of Schedule 2, other than Ground 8. These are fault grounds and include behaviour such as non-payment of rent, breach of tenancy conditions, conduct likely to cause nuisance or annoyance, and use of the property for immoral or illegal purposes. It is not necessary for the applicant to have actually been a tenant of the local authority when the unacceptable behaviour occurred. The test is whether the behaviour would have entitled the local authority to a possession order if, whether actually or notionally, the applicant had been a secure tenant.

Test of Unacceptable Behaviour

Where we have reason to believe that s.160A (7) of the HA 1996 may apply, we will apply a three stage test before deciding whether to use the power to decide that an applicant is ineligible for allocation or will be given no preference.

(i) **Is there evidence of unacceptable behaviour? Was it serious enough to have entitled an authority to obtain a possession order?**

We will need to be satisfied that there has been unacceptable behaviour which falls within the definition in s.160A (8) of the HA 1996. If a court has already made a possession order on one of the discretionary grounds, then we may accept that as evidence of unacceptable behaviour, and proceed to paragraphs (ii) and (iii) below.

Unacceptable behaviour may include the following (this list is non-exhaustive):-

- Non-payment of rent.
- Causing nuisance and annoyance to neighbours.
- Criminal convictions.
- Using a property for illegal or immoral purposes.
- Failing to conduct a tenancy in a satisfactory manner.

- Committing certain criminal offences in the locality of their home and still posing a threat to neighbours or the community.
- Being violent towards a partner or members of the family.
- Allowing the condition of the property to deteriorate beyond a level deemed acceptable by Tai Tarian Ltd.
- Obtaining a tenancy by deception, for example, by giving false information.
- Being subject to an anti-social behaviour injunction or order.
- Tenants who have had their tenancy demoted due to anti-social behaviour.

(ii) **Was the behaviour serious enough to render the applicant or a household member unsuitable to be a tenant?**

Having concluded that there would be entitlement to an order, we will need to satisfy ourselves that the behaviour is serious enough to make the person unsuitable to be a tenant. We need to satisfy ourselves that if a possession order were granted it would have been an outright order. Where we have reason to believe that the court would have suspended the order, then such behaviour should not normally be considered serious enough to make the applicant unsuitable to be a tenant.

Possession Orders are often suspended in rent arrears cases to give tenants an opportunity to clear the rent arrears

- (a) The arrears are relatively modest.
- (b) have been caused by delays in housing benefit/universal credit.
- (c) the tenant does not have a history of persistently defaulting on rent payments.
- (d) the applicant was not in control of the household's finances or was unaware that rent arrears were accruing or is being held liable for a partner's debts.
- (e) the local authority has failed to take steps or provide advice to help the tenant pay their rent.

Factors which may weigh in favour of exclusion are:-

- a) Failure to adhere to the terms of an agreed payment plan in relation to rent arrears or housing debt.
- b) A high level of arrears.

Similarly, courts are generally inclined to suspend a possession order in respect of anti-social behaviour where:-

- a) The allegations of nuisance are relatively minor.
- b) The nuisance was caused by a member of the household who has since left.
- c) The court is satisfied that the imposition of a suspended order will serve to control the tenant's future behaviour.

Examples of anti-social or criminal behaviour which could render an applicant unsuitable to be a tenant include:

- a) Conviction for illegal or immoral purpose.
- b) Causing a nuisance and annoyance to neighbours or visitors.
- c) Committing certain criminal offences in or near the home and still posing threat to neighbours or the community.
- d) Being violent towards a partner or members of the family.

(iii) **Is the behaviour unacceptable at the time of application?**

Finally, if satisfied that the applicant is unsuitable to be a tenant by reason of the unacceptable behaviour in question, we must have regard to the circumstances at the time the application is considered and must satisfy ourselves that the applicant is still unsuitable at the time of the application. Previous unacceptable behaviour or even an outright possession order, may not justify a decision to treat the applicant as ineligible where that behaviour can be shown by the applicant to have improved.

Only if satisfied on all three aspects, can we consider exercising our discretion to decide if the applicant is to be treated as ineligible for an allocation. In reaching our decision, we will act reasonably. That means we will consider each application on its own merits. We will have regard for each applicant's personal circumstances (and the personal circumstances of the applicant's household), including his or her health and medical needs, dependents and any other factors relevant to the application. We will have regards to information provided on the application form and supporting information.

If an applicant, who has, in the past, been deemed by us to be ineligible, now considers his/her unacceptable behaviour should no longer be held against him/her as a result of changed circumstances; he/she can make a fresh application. Unless there has been a considerable lapse of time it will be for the applicant to show that his/her circumstances or behaviour has changed. What constitutes a considerable lapse of time will depend upon the individual circumstances of the case and in particular the nature of the unacceptable behaviour. Some applicants may find this process difficult and should be referred to an independent source of housing advice such as Shelter Cymru.

Unacceptable Behaviour – Ineligible or No Priority/Adjusted Priority for an Allocation?

There is no obligation on us to treat an applicant as ineligible for an allocation (s.160A (7) of the HA 1996) due to an applicant's or household member's behaviour. If we do apply the unacceptable behaviour standard and a person is deemed unsuitable to be a tenant, we may treat them as eligible but reduce the priority that is given to their housing application. By virtue of s.167(2B) and (2C) of the HA 1996, an allocation scheme may provide that no preference is given to an applicant where the local authority is satisfied that he/she, or a member of his/her household has been guilty of unacceptable behaviour serious enough to make him/her unsuitable to be a tenant and the local authority is satisfied that, in the circumstances at the time the case is considered, he/she deserves not to be treated as a person who should be given reasonable preference.

By virtue of s.167(2D) of the HA 1996, the same provisions apply for determining what is unacceptable behaviour for the purposes of deciding whether to give preference to an applicant, as apply to a decision on eligibility (s.160A(8) HA 1996).

Hence, in cases where the grounds for exclusion are made out, we will consider whether it would be appropriate to give no priority or adjusted priority to the applicant as an alternative to excluding them. If we decide to give no priority or adjusted priority then this will result in the applicant being put into a lower band than would otherwise be the case.

Unacceptable Behaviour and Discharge of Duties to People Who Are Statutorily Homeless

It is possible for us where the Council has determined an applicant to be unintentionally homeless and in priority need, to determine also that they are guilty of unacceptable behaviour serious enough to make them unsuitable to be a tenant and decide:-

- To treat them as ineligible for an allocation (s.160A(7) of the HA 1996)
- To not afford them any priority for rehousing under their allocation scheme (s.167 (2B and 2C) HA 1996).
- that they are not eligible to apply under the Homes by Choice Scheme but instead consider them only for an offer of specific premises outside of Homes by Choice
- that they are eligible and entitled to bid for any accommodation they are entitled to bid for under the Scheme

It should be noted however that the Council will still have a statutory duty to secure accommodation for such persons though this need not be through a statutory allocation (see Section 159 of the HA 1996) under its allocation scheme. In such cases, the Council has the discretion to accommodate such persons in the private sector or by some other means.

In such cases where the Council's Housing Options Team owes a duty to the applicant to secure them accommodation under Section 75 of the HWA but a decision is being considered to exclude the applicant from the scheme or to give them no/adjusted preference due to unacceptable behaviour then the Housing Options Team will be notified of this and given the opportunity to provide comments/submissions within a reasonable period. A Tai Tarian appointed person considering the case will have regard to any representations made by the Housing Options Team representative.

If a Tai Tarian appointed person comes to a decision to exclude the applicant from the scheme or to give them no/adjusted preference due to unacceptable behaviour then as well as sending the decision to the applicant they will notify the Council's Housing Options Team of that decision, together with the reasons for it. Should an application for a review be put in by the applicant (**see Appendix 9** on Reviews) then a review will be undertaken by a Tai Tarian appointed person and a representative from the Housing Options Team. The decision on the review though will be that for the Tai Tarian representative alone though they will have regards to any representations made by the Housing Options Team representative. See **Appendix 9** for full details of the review procedures.

If there are grounds to exclude a homeless applicant who is owed a duty under Chapter 2 of the HWA (or Part 7 of the HA 1996 for applications made before 27 April 2015) to be

secured accommodation by the Council's Housing Options Team then a Tai Tarian appointed person could decide that they are not eligible to apply under the Homes by Choice Scheme but instead consider them only for an offer of specific premises outside of Homes by Choice. The applicant will have the same right to ask for a review of such a decision as they would for a decision to completely exclude them from the scheme or to award them no/adjusted preference.

Procedures for Exclusions and the Awarding of No/Adjusted Preference

Where an application discloses information which could potentially give rise to a decision that the applicant may:-

- Be excluded.
- Given no/adjusted priority.
- Disallowed to bid under Homes by Choice and only considered for offers of specific premises.

Due to unacceptable behaviour then a Tai Tarian appointed person dealing with the application shall request from the applicant whatever information and documentation which is necessary to obtain all relevant facts relating to the behaviour in question.

- a) **Housing related debt** – the applicant may be requested to provide copies of any court orders, rent account details, contact details for the previous landlord to establish the background to the accrual of the arrears. The applicant may be asked to explain how the arrears arose and to put forward any mitigation for the accrual of the arrears. If the applicant asserts that they have cleared the debts then they may be asked to provide proof of that.
- b) **Anti-social behaviour/criminal conviction** – the applicant may be requested to provide copies of any court orders, proof of any convictions, mitigation for the behaviour in question, probation reports, reports from other agencies, etc. A Tai Tarian appointed person will work with the Police, probation services and other statutory and voluntary agencies in sharing information on sex offenders or other violent applicants and, where appropriate, become involved in the management of the risk posed by them.
- c) **Other tenancy breaches/behaviour** – the applicant may be requested to provide documentation regarding the breaches of tenancy in question and invited to provide any explanation or mitigation of those breaches. This could include, for instance:-
 - Allowing the condition of the property to deteriorate.
 - Allowing any furniture provided by the landlord to deteriorate due to ill treatment.
 - Obtaining a tenancy by deception, for example by giving false information.

A Tai Tarian appointed person should avoid unreasonably long delays in processing applications due to having to wait lengthy periods for the production of documentation in connection with the assessment of whether to exclude them.

If a Tai Tarian appointed person considers that there are grounds for excluding the applicant or awarding no/adjusted priority then they will put the application forward with a report setting

out all relevant facts and appending all relevant documentation. Where the applicant is owed a duty by the Council to be secured accommodation under chapter 2 of the HWA then a Tai Tarian appointed person will also notify the Council's Housing Options Team of the intention to consider exclusion and/or awarding no/adjusted priority. A Tai Tarian appointed person will consider the report and request any further documentation that they may need. A Tai Tarian appointed person will consider whether the grounds for exclusion are made out. If they are, then a Tai Tarian appointed person will decide if it's appropriate to exclude the applicant or to remove the preference that they would otherwise be entitled to.

If the decision is to exclude the applicant or remove their preference then a Tai Tarian appointed person will draw up a written decision and issue it to the applicant. Where the applicant is owed a duty by the Council under chapter 2 of the HWA a Tai Tarian appointed person will have regard to any representations made by the Housing Options Team on the applicant's behalf. Any such written decision will set out the full reasons why the applicant has been excluded or had their preference removed, together with what facts a Tai Tarian appointed person had regards to in coming to that decision.

For such a decision Tai Tarian will notify the applicant of their right to ask for a review of the decision and of any facts - see **Appendix 9** on reviews. Where we believe that an applicant may have difficulty in understanding the implications of a decision of ineligibility, arrangements will be made for the information to be explained in person.

In cases where the notification cannot be sent to the applicant or we believe that it may not have been received by him or her, we will make available at our office a written statement of our decision, and the reasons for it, to enable the applicant, or someone who represents the applicant, to collect within a reasonable period.

APPENDIX 3 - DETAILED CRITERIA FOR EACH OF THE BANDS COMPRISING THE SCHEME

Note:

- *The bands are to be considered in conjunction with other relevant sections of the policy, including eligibility for the Register;*
- *Sub categories for all bands will only apply where the applicants' circumstances would be significantly improved by moving to suitable accommodation;*
- *Lists within bands are not exhaustive and some circumstances may not be covered but are relevant for consideration.*

URGENT BAND – URGENT PRIORITY (REASONABLE PREFERENCE PLUS ADDITIONAL PREFERENCE)	
Sub Categories of Band	Examples of Qualifying Circumstances / Summary of Criteria
<p>Homeless applicants where the Council has an interim duty under Section 68 of the HWA to secure accommodation in priority need.</p> <p>Applicants in temporary accommodation under Section 68 HWA and who are owed a duty by the Council under either Section 73 HWA (duty to help secure accommodation for homeless applicants) or Section 75 HWA (duty to secure accommodation for applicants in priority need following the end of a duty under Section 73)</p>	<p>Applicants who have been accepted by the Council as being entitled to temporary accommodation under Section 68 of the HWA.</p> <p>Applicants living in temporary accommodation arranged by the Council to meet its duty under Section 68 of the HWA and where the Council has accepted a duty under either Section 73 or Section 75 of the HWA.</p> <p>Temporary accommodation is any accommodation identified by the Council for an applicant to discharge its duty under Section 68 and which includes refuge accommodation.</p>
MARAC CASES	<p>At risk applicants who are subject to a MARAC (Multi Agency Risk Assessment Conference) which supports an urgent move to suitable accommodation in specified areas. The move will not be within the same area unless it is with the agreement of the Council's Housing Options Team and/or MARAC Co-ordinator. This will be as part of an agreed safety plan for high risk victims who will be eligible for additional preference and will be placed in the Urgent Band. Move-on</p>

	<p>requirements from refuge accommodation will be considered by a Tai Tarian appointed person.</p>
<p>WELFARE CASE URGENT- Deemed to have a very high social circumstance that is seriously affected by current housing</p>	<p>Examples of applicants who will fall within this category are below:</p> <ul style="list-style-type: none"> • Where the applicant is the main carer and needs to give constant care and support to a person with an Urgent health need (the nature of which comes within an Urgent band for health) but this is difficult to do at present because: <ul style="list-style-type: none"> (i) Applicant lives too far away, or (j) There is extreme financial hardship for the applicant providing the care and support. • Applicant or member of household has received or is threatened with serious physical/sexual, racial or homophobic/transphobic abuse and needs to move away from the locality. • Witnesses of crime or victims of crime who are deemed by the Police to be at risk of intimidation or violence. (Note: Not applicable to applicants who go through homeless route). • It has been established that a serious threat to the well-being, education or safeguarding of a child exists and that their accommodation is a contributory factor to the risk. These are cases where Social Services can confirm that there is an urgent need to move to mitigate the risk to the child. This includes foster carers needing larger home, confirmed by Social Services. <p>The above list is not exhaustive and some circumstances may not be covered but are relevant for consideration as a social/welfare need. Supporting evidence and/or a multi-agency approach to addressing the need is required. The decision on any such award to be at the discretion of a Tai Tarian appointed person considering the application. If an applicant bids for a property that would not achieve the objective of the social/welfare need award that has been given then we may remove the priority awarded under this category for that bid.</p>
<p>HEALTH CASE URGENT – Deemed to have severe health needs. Health is seriously affected by their current housing making existing accommodation unsuitable – e.g. hospital discharge, currently receiving palliative care, has a life limiting condition, health is so severely affected by the accommodation</p>	<p>This applies where the applicant and/or members of their household have a severe health need, examples of which are below:</p> <ul style="list-style-type: none"> • Where the applicant with an Urgent health need (the nature of which comes within an Urgent band for health) is ready for discharge from hospital and either of the following apply: <ul style="list-style-type: none"> (i) Applicant has somewhere to live but it is deemed unsuitable for their needs and cannot be made suitable

that it is likely to become life threatening, disabled and assessed as requiring major works of adaptation, overcrowding resulting in a risk of a life threatening infection

through adaptations due to cost, structural difficulties or the property cannot be adapted within a reasonable amount of time, or

(ii) Applicant has nowhere at all to live and all other reasonable housing options have been explored.

- Is currently receiving palliative care and urgently requires rehousing to facilitate the on-going provision of this care.
- Has a life limiting condition and their current accommodation is affecting their ability to retain independence or enable adequate care.
- Health is so severely affected by the accommodation that it is likely to become life threatening, e.g. applicant has severe mental health/learning disability problems that are significantly exacerbated by their accommodation.
- Is disabled and has been assessed as requiring major works of adaptation. As a direct result of the limitations posed by the current property they are unable to carry out day-to-day activities or have difficulty in accessing facilities inside or outside their home. The award of additional preference will not be made where it has been assessed that rehousing would not facilitate a reduction in the limitations identified.
- A Tai Tarian tenant living in accommodation assessed by Tai Tarian as being adapted, who no longer requires the adaptations in their current home, may be supported as an Urgent case for a transfer where Tai Tarian has identified a suitable applicant for the accommodation they are currently living in. This award may still be valid if the applicant requires adaptations, provided that the adaptations required are substantially different from those in their current home as assessed by Tai Tarian.
- Overcrowding in their current property leaves them at risk of a life threatening infection, e.g. is suffering from a late-stage or advanced infection.
- Is elderly, disabled (including a severe mental health or learning disability) and has a progressive illness resulting in them likely to require admission to hospital or residential /nursing care in the immediate future and re-housing would enable them to remain at home.
- Need to receive constant care and support due to being an urgent health case and transport is a problem or moving away from a community would cause hardship in receiving support.

The award of priority under this section is always subject to the proviso that if an applicant 'bids' for a property that would not benefit the reason why the priority was awarded then the priority will be removed for the purpose of considering the bid for that particular property.

<p>ARMED FORCES SERVICE PERSONNEL – who have been seriously injured or disabled in action and who have an urgent need for social housing</p>	<ul style="list-style-type: none"> • This applies to any applicant who needs to move to suitable adapted accommodation because of a serious injury, medical condition or disability which he or she, or a member of their household, has sustained as a result of service in the Armed Forces.
<p>EXISTING TAI TARIAN TENANTS WHO ARE UNDER-OCCUPYING – and are prepared to downsize to a property with fewer bedrooms and who are suffering financial hardship</p>	<ul style="list-style-type: none"> • This applies to an existing Tai Tarian tenant who is under-occupying a social rented property and is prepared to downsize to a property with fewer bedrooms, which is suitable for their needs, but only if they are suffering extreme financial hardship due to Welfare Reform. This involves a shortfall in Housing Benefit or Universal Credit Housing Contribution due to Welfare Reform changes such as Bedroom Tax, Benefit Cap or Local Housing Allowance. As a guide this equates to a 25% shortfall. An affordability assessment is undertaken in these cases.
<p>HOUSING CONDITIONS URGENT – Housing situation seriously unsuitable with no prospect of the issue being remedied in a reasonable period of time</p>	<ul style="list-style-type: none"> • Cases where the housing situation has been assessed by the Council’s Environmental Health as being seriously unsuitable with no prospect of the issue being remedied in a reasonable period of time. Applicants who have contributed to the housing conditions will not be considered in this band.
<p>EXCEPTIONAL CIRCUMSTANCES – Management Discretion</p>	<ul style="list-style-type: none"> • This will include cases which have highly exceptional and significant circumstances, where an applicant needs to move urgently and the only way to expedite a move is through the use of management discretion.

GOLD BAND – HIGH HOUSING NEED REASONABLE PREFERENCE	
Sub Categories of Band	Examples of Qualifying Circumstances / Summary of Criteria
<p>HOMELESS/THREATENED WITH HOMELESSNESS CASES (OTHER THAN APPLICANTS WHO FALL WITHIN THE URGENT BAND)</p> <p>Section 66 of the HWA (those where the Council has a duty to help prevent an applicant from becoming homeless)</p> <p>Section 73 (those where the Council has a duty to secure accommodation)</p> <p>Section 75 (those where the Council has a duty to secure accommodation for applicants in priority need when the section 73 duty ends)</p>	<p>Applicants who are not residing in temporary accommodation arranged by the Council to meet its duties under Section 68 of the HWA but where the Council has accepted a duty under either Section 73 or 75 of the HWA.</p> <p>Applicants who are owed a duty by the Council under Section 66 of the HWA.</p>
<p>WELFARE CASE HIGH – MOVING HOME WILL BENEFIT APPLICANT (deemed to have a serious social circumstance)</p>	<p>Examples of applicants who will be given reasonable preference under this category are:-</p> <ul style="list-style-type: none"> • Victims of harassment through anti-social behaviour – evidence of ongoing and targeted harassment. • Victims who need to move due to violence or harassment and where legal action is pursued. Also it will have been assessed and confirmed by the relevant agencies that they are not in any immediate danger but their housing circumstances would be significantly improved by moving to suitable accommodation in specified areas. • This band may be awarded where the applicant is at least one of the main carers and needs to give regular care and support to a person with serious health ailments or disability (the nature of which comes within a Gold Band for health) but this is difficult to do at present because: <ul style="list-style-type: none"> (i) Applicant lives too far away, or (ii) There is extreme financial hardship for the applicant providing the care and support. To

receive this, the person the applicant is caring for has to be in receipt of Attendance Allowance, the care component of Disability Living Allowance or the daily living component of the Personal Independence Payment, and they spend at least 35 hours per week with them.

- Applicants leaving supported housing where after a review of support plan by support provider, they recommend a move to independent accommodation including young people at risk and care leavers.
- Currently residing in a supported housing scheme funded via Welsh Government programme funding for supported housing. The relevant band will only be awarded where the support provider has identified the need to move-on following a review of the applicant's support plan. This will not include floating support or Haven Housing Schemes.

In both of the above instances for supported housing, the support provider makes a recommendation to the Move-on Panel, who is required to approve the move. Move-on requirements from other forms of accommodation which do not come within the remit of "supported housing" will be considered by a Tai Tarian appointed person.

- There are children that are part of the application, who need to move and their accommodation has been assessed by Social Services as being a contributory factor to the risk of the child. The award will only be made where:
 - (i) There is a child protection plan in place; and
 - (ii) A report from the child's social worker supports the need to move, with rehousing being an important factor to the ongoing welfare of the child. The report will need to be countersigned by the relevant Social Services team manager.
- This band applies to applicants which come under the provisions of the Rent (Agriculture) Act 1976, where a displaced Agricultural worker requires assistance with accommodation.

The above list is not exhaustive and some circumstances may not be covered but are relevant for consideration of a social/welfare need. The decision on any such award to be at the discretion of a Tai Tarian appointed person considering the application.

If an applicant bids for a property that would not achieve the objective of the social need award that has been given then we may remove the priority awarded under this category for that bid.

<p>HEALTH CASE HIGH – MOVING HOME WILL BENEFIT APPLICANT (deemed to have serious health ailments or disability)</p>	<p>Reasonable preference will be awarded to applicants and/or members of their household because housing is unsuitable due to serious health ailments or disability, but who are not housebound, or whose health, or safety is not at such a risk level to require immediate urgent housing. The serious health ailment(s) would be significantly improved by moving to suitable accommodation.</p> <p>Examples of applicants who will fall within this Category are below:</p> <ul style="list-style-type: none"> • Need to receive regular care and support due to being a Gold health case and transport is a problem or moving away from a community would cause hardship in receiving regular support. • Receiving regular health treatment/care, which is difficult to access. • Is disabled and has been assessed as requiring works of adaptation. As a direct result of the limitations posed by the current property they are unable to carry out day-to-day activities or have difficulty in accessing facilities inside or outside their home. The award of additional preference will not be made where it has been assessed that rehousing would not facilitate a reduction in the limitations identified. • A person whose disability means that re-housing would enable them to overcome physical barriers created by their current accommodation e.g. stairs and steps. • A person with a terminal illness or long-term medical debilitating condition whose current accommodation is not having a significant impact on their condition but where their quality of life would be significantly improved by moving to alternative settled accommodation which may or may not be closer to support. <p>The award of priority under this section is always subject to the proviso that if an applicant ‘bids’ for a property that would not benefit the reason why the priority was awarded, then the priority will be removed for the purpose of considering the bid for that particular property.</p>
<p>EXISTING TAI TARIAN TENANTS WHO ARE UNDER-OCCUPYING</p>	<ul style="list-style-type: none"> • This applies to an existing Tai Tarian tenant who is under-occupying a property and is prepared to downsize to a property with fewer bedrooms, which is suitable for their needs, but only if they are suffering severe financial hardship due to Welfare Reform. This involves a shortfall in Housing Benefit or Universal Credit Housing Contribution such as Bedroom Tax or Benefit Cap. As a

	<p>guide this equates to a 14% shortfall. An affordability assessment will be undertaken in these cases.</p> <ul style="list-style-type: none"> • This includes an existing Tai Tarian tenant wishing to downsize from 2, 3, 4 or 4+ bed family accommodation, which will free up a property which meets the needs as deemed by Tai Tarian of another applicant.
<p>ACUTE OVERCROWDING – as defined by the ‘bedroom standard’</p>	<p>We are satisfied the applicant is overcrowding their current accommodation by 2 or more bedrooms (the ‘Bedroom Standard’ is defined in below). Applicants who have contributed to the overcrowding will not be considered in this band.</p>
<p>HOUSING CONDITIONS HIGH – insanitary, or unsatisfactory housing conditions</p>	<p>INSANITARY - Where the property has been assessed by the Council's Environmental Health as either filthy or so contaminated or seriously infested by pests, so as to give rise to an imminent risk of serious harm AND these matters cannot be rectified while the property is being occupied. Applicants who have contributed to the housing conditions will not be considered in this band.</p> <p>UNSATISFACTORY – Where the property is:</p> <p>(a) Inadequate by virtue that its condition does not protect the applicant from an imminent risk of serious harm AND these matters cannot be rectified while the property is being occupied. This includes properties where any of the following basic facilities and provisions are absent:</p> <ul style="list-style-type: none"> • Internal WC • Internal bath or shower • Cooking provisions • A supply of cold or hot water • Room heating to habitable rooms • Natural or artificial lighting • Appropriate fire detection and a suitable means of escape in high risk properties (e.g. houses in multiple occupation) <p>(b) Subject to a Demolition or Compulsory Purchase Order.</p> <p>(c) Suffering from severe dampness (excluding condensation caused by the occupancy of the property) which prevents the habitable rooms from being occupied.</p>

SILVER BAND – MEDIUM HOUSING NEED

<p>OTHER HOMELESS / THREATENED WITH HOMELESSNESS APPLICANTS -</p> <p>Homeless and threatened with homelessness applicants who are not owed duties under sections 66, 68, 73 or 75 of the Housing (Wales) Act 2014.</p>	<p>Applicants who are threatened with homelessness but who are not owed duties under section 66 to prevent them from becoming homeless. This could be because they are not eligible for help.</p> <p>Applicants who the Council has reason to believe are homeless or who the Council has decided are homeless but are not owed duties under sections 68, 73 or 75. This could be, for instance, because the applicant does not have priority need, because they are not eligible for assistance, because they have been found to be intentionally homeless, etc.</p>
<p>SHARING FACILITIES - (not for applicants that have left the family home)</p>	<p>This category applies where an applicant is deemed to be sharing all of the following rooms with another household:</p> <ul style="list-style-type: none"> • Living Room • Kitchen • Bathroom • WC <p>Applicants who have never left the family home will not be considered to be sharing, unless there is evidence to suggest a newly forming household.</p>
<p>APPLICANTS LACKING A BEDROOM – having regard to the ‘bedroom standard’</p>	<p>The ‘Bedroom Standard’ is defined in below. This applies to applicants overcrowded by 1 bedroom according to the ‘Bedroom Standard’ for overcrowding (see below), unless the accommodation they have applied for would have the same number of bedrooms as their current accommodation.</p>
<p>WELFARE CASE MEDIUM - Deemed to have a minor social circumstance</p>	<p>This category applies where an applicant and/or members of their household are deemed to have a minor social circumstance that is affected by current housing and which would be improved by moving to suitable accommodation.</p> <p>This category applies for instance to:</p> <p>Applicants experiencing difficulty in accessing employment or education, or other services where there is a need to move to avoid hardship by being able to:</p> <p>(i) Overcome barriers to employment and education due to severe mental health issues, long term unemployment, caring responsibilities, physical ill health, criminal record and substance misuse. In recognition of the multiple problems which can stop individuals finding work, they will be receiving ongoing</p>

	<p>extra help from government funds (costs related to parents with young children and carers etc.) or</p> <p>(ii) Take up or be near specific work, or training or job opportunities not available elsewhere in the County Borough. Applicants will only be considered for this award where they do not live within a reasonable commuting distance of their place of current or prospective employment, taking into consideration their ability to use and the availability of public/private transport. Evidence is required that the difficulties being experienced are greater than those commonly experienced by others across the County Borough. The applicant will be required to provide confirmation of employment details from their employer or enrolment on a training course from the training provider.</p>
<p>HEALTH CASE MEDIUM – MOVING HOME WILL BENEFIT APPLICANT (deemed to have a minor ailment)</p>	<p>Will be awarded to applicants under this category where the applicant <i>and/or</i> members of their household have a minor health ailment that would be improved by moving to suitable accommodation.</p> <p>This category applies for instance to:</p> <p>The current accommodation directly exacerbates a recognised medical condition, is the direct cause of a medical condition or impacts on the ease of use of the facilities within their home for a disabled person. The award of this band will only be made where it has been assessed that rehousing would facilitate an improvement in wellbeing, taking into consideration all relevant supporting information.</p>
<p>HOUSING CONDITIONS MEDIUM - Unsatisfactory/Disrepair</p>	<p>Where the property has been assessed by the Council's Environmental Health that it does not pose an imminent risk to the health or safety of the applicant, but there are unsatisfactory conditions or disrepair caused by the lack of upkeep or maintenance of the property.</p> <p>This band will not be used where there is evidence alleging any damage, unsatisfactory conditions or disrepair was caused by the applicant, current occupiers or visitors to the property.</p>

BRONZE BAND – LOW / NO HOUSING NEED

ANY APPLICANT that does not fall within Urgent, Gold or Silver bands.	Includes any applicant who does not fall into bands Urgent Gold or Silver above.
APPLICANTS who do not have a local connection as detailed in Section 4.11	This covers applicants who do not have a 'local connection' with the County Borough within the meaning of this policy.

The Bedroom Standard

For the purpose of this scheme it is recognised that persons considered for sharing a room must be family members. Therefore two persons (who are not in the same family) in a relationship are considered as requiring their own bedroom and should not share that room with any other person. The table below shows the bedroom entitlement for adults and children according to the 'Bedroom Standard' legislation, which assesses overcrowding. See **Section 4.1.2** and **table 4.7** for property size and type eligibility.

Bedroom Standard:

	NUMBER OF BEDROOMS	
HOUSEHOLD MEMBERS	1	2
Single adults over 21	√	
Couple (married or cohabitating) wishing to live together	√	
Single person/couple who are supported for an additional bedroom		√
20 x weeks pregnant woman with or without partner and no other children		√
One child	√	
Two children under 10 regardless of sex	√	
Two children of the same sex aged between 0 and 21	√	
Two children of different sex aged between 10 and 21		√

APPENDIX 4 - PROPERTY SIZE AND TYPE ELIGIBILITY

4.1 Property Size Criteria

- 4.1.1 The following matching process will be used to assess an applicant's bedroom requirements.
- 4.1.2 The following table shows the size and type of property that applicants may be considered for based on their household size either when submitting a bid for an advertised property or for a direct allocation outside the Homes by Choice Scheme.
- 4.1.3 All properties advertised through the Homes by Choice Scheme will display the band applicants have to be included in and details of the household type and size who are eligible to bid for each property. Consideration will be given to including maximum occupancy levels for advertised properties.
- 4.1.4 Applicants will be expected to only bid for properties which suit their household size. However, a Tai Tarian appointed person may re-classify an applicant as requiring a higher number of bedrooms where the applicant has overnight access to or access rights to a child/children. See **Section 4.6** below.
- 4.1.5 Where there is low demand for certain accommodation Tai Tarian may decide to advertise a property for an applicant who would under-occupy the property. If this is the case the issue of affordability will be considered prior to any offer of accommodation.

4.2 Pregnant Women

- 4.2.1 The expected child will only be added to the application from week 20 of the pregnancy, once the MAT B1 has been received. It is the responsibility of the applicant to provide this information.
- 4.2.2 The applicant must provide proof of pregnancy before the expected child is added to the application.

4.3 Access to Children

- 4.3.1 Single applicants or couples, who do not have children living with them on a full time basis but who have access to a child/children will qualify for two bedroom accommodation, providing they supply written evidence that the child/children stay overnight at least two nights a week, or the average overnight stay equals this.
- 4.3.2 Written evidence to confirm the above must be provided and can include a letter from the partner who the child/children normally live with, a solicitor, Social Services or Court Order detailing access arrangements.

- 4.3.3 Applicants who would under-occupy the property based on the welfare reform rules will have an affordability assessment carried out to confirm that they can afford to occupy the property. This may be done at the point of application **and/or** at the point of offer.
- 4.3.4 If an applicant is unable to demonstrate they can afford the property, they will only be eligible to bid for one bedroom accommodation, unless there is a change in their circumstances. It is the responsibility of the applicant to update Tai Tarian of any change in circumstances that would affect this decision.
- 4.3.5 Where an applicant already has children in their household but also has access to other children, then they may be entitled to a further bedroom/bedrooms under **Section 4.6** below.

4.4 **Applicants with Children**

- 4.4.1 With the introduction of welfare reform the rules on bedroom use has changed so that applicants with two children may be deemed to under-occupy three bedroom accommodation for Housing Benefit/Universal Credit housing cost purposes. The exception to this may be approved foster carers.
- 4.4.2 Due to this Tai Tarian has decided to offer flexibility in the size of accommodation an applicant with children may be eligible for. The property size table demonstrates that applicants with children may elect to be considered for two, three or four bedroom accommodation depending on their circumstances.
- 4.4.3 Where an applicant with children subject to Housing Benefit/Universal Credit elects to be considered for accommodation, which would result in a reduction in Housing Benefit/Universal Credit housing costs then an affordability assessment, will be required from the point of application to ensure they can afford to occupy the property.
- 4.4.4 If an applicant is unable to demonstrate they can afford the property, they will only be eligible to bid for properties in line with the welfare reform rules, unless there is a change in their circumstances. It is the responsibility of the applicant to update Tai Tarian of any change in circumstances that would affect this decision.

4.5 **Older Persons' Accommodation**

- 4.5.1 Some properties will be suitable for older persons and will be advertised with an age restriction on those applicants eligible to bid for the property.
- 4.5.2 Older persons' accommodation will be offered to applicants aged over 55 years in the first instance, in accordance with the banding principle of priority.
- 4.5.3 If there is no demand from applicants aged over 55 years, it will be advertised for applicants aged over 50 years and then applicants aged over 40 years and so on as required, in accordance with the principles of banding priority.

4.6 Bedroom Entitlement

- 4.6.1 In some cases where there is a need for an additional bedroom as assessed through health or social needs the applicant's bedroom entitlement may be re-classified, even if the property is not fully occupied all the time.
- 4.6.2 In health terms this may mean an application through serious health problems may require to sleep in a separate bedroom from a partner, or may require a carer to stay overnight. Supporting evidence may be required to consider such requests.
- 4.6.3 For social reasons this may mean that an additional bedroom is required for an exceptional reason. Supporting evidence may be required to consider such requests.
- 4.6.4 In all such cases the decision to grant an additional bedroom entitlement to the applicant will be made by Tai Tarian, who will have regard to supporting evidence provided by the applicant.
- 4.6.5 Due to the shortage of 4 bedroom properties, 3 bedroom properties with two reception rooms will be considered as suitable for 4 bedroom applicants, where the room sizes are large enough to accommodate such applicants and taking into account the overall size of the property.
- 4.6.6 Properties will be advertised to show the maximum number of persons that can be reasonably expected to occupy so as not to cause overcrowding.

(Please see table of Property Size and Type Eligibility)

4.7 Property Size & Type Eligibility

Household Size	Bedsit	Flat /Maisonette / Bungalow			House				
		1 Bed	2 Bed	3 Bed	1 Bed	2 Bed	3 Bed	*3 Bed (Parlour Type)	4 Bed +
Single Person	√	√							
Single Person with overnight access to one child +		√	√						
Single couple who are pregnant 20+ weeks		√	√			√			
Couple		√	√						
*2 Single Adults			√						
3 Single Adults				√			√	√	
Single Adult / Couple + 1 Child or Non-Dependent			√			√			
Single Adult / Couple + 2 Children (different sex, aged under 10)			√	√		√	√		
Single Adult / couple + 2 children (same sex aged under 16)			√	√		√	√		
Single Adult / Couple + 2 children (different sex, one child Aged 10+)				√		√	√		
Single Adult / Couple + 3 Children				√			√	√	
Single Adult / Couple + 4 or more Children							√	√	√
Other family households that qualify for 4 bedrooms								√	√

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*2 single adults may be considered for a house as well as a flat in “low demand” areas

*3 Bed (Parlour Type): see **Section 4.6.5**

Also see **Section 4.1.2** for an explanation of this table.

Maximum Occupancy

NB. Properties will be advertised to show the maximum number of persons that can be reasonably expected to occupy so as not to cause overcrowding.

Note that the above table is subject to the discretion set out above in **Section 4.6** of this appendix where there is a need for an additional bedroom as assessed through health or social needs, to re-classify the applicant’s bedroom entitlement, even if the property is not fully occupied all the time.

The table below sets out the Categorisation of Applicants

Person Category Classification	Suitable Applicants
D	Disabled facilities required by applicant as agreed by Tai Tarian. Properties are classified according to the level of adaptations.
G	General needs applicants accommodation.
O	Older applicants and family members aged over 55 years. We will be flexible regarding this age restriction, particularly where an applicant who does not meet the age criteria has mobility problems.
S	Applicants whose accommodation needs after an assessment can be more appropriately met by supported accommodation; and so will either be considered for a supported housing unit with Tai Tarian or another provider.

APPENDIX 5 - ADAPTED DISABLED ACCOMMODATION CRITERIA

- 5.1 At the point of the application assessment by Tai Tarian an applicant will provide details of their housing need. Under the banding scheme a number of needs factors may be considered, one of which may be in relation to the health needs of the applicant.
- 5.2 Where the applicant has declared to Tai Tarian that they have health needs which are affected by their present housing circumstances Tai Tarian will ask the applicant for their particular health needs to determine the level of health need using the relevant factors in the banding scheme.
- 5.3 Where an applicant has stated that they need a property with disabled facilities a health assessment will be completed to determine whether the applicant should be considered for adapted disabled accommodation in accordance with **Section 7** of this policy. A referral may be required of an Occupational Therapist or other relevant medical practitioner who may discuss the matter with the applicant. This will be undertaken prior to the decision to consider the applicant as a disabled category applicant.
- 5.4 If an applicant meets the criteria for acceptance of a property with disabled facilities their application details will be included in the banding scheme and given an applicant category status of D (disabled facilities). Their details will be retained on an additional list of applicants who require disabled facilities which details their adaptation requirements.
- 5.5 The eligibility of an applicant's need for adapted accommodation may be measured by criteria including:-
- Any mobility issues for the applicant or other person within the household who are to be re-housed.
 - Whether the applicant, or other person within the household, is a wheelchair user.
 - Whether the applicant, or other person within the household, require a walk in shower facility.
 - Whether there are any children with disabilities within the household.
 - Whether the applicant, or other person within the household, is in receipt of a benefit that classes them as in need of a certain level of care, such as the medium to high rate of the care component of Disability Living Allowance, high rate of Mobility Allowance, standard or enhanced rate of the daily living component of the Personal Independence Payment, the enhanced rate of mobility of the Personal Independence Payment or Attendance Allowance.
 - Whether the person requiring the adapted accommodation is primarily resident with the applicant or whether the application for adapted accommodation relates to a household in which the person requiring the adaptation is not ordinarily or primarily resident (and their main place of residence is adapted to meet their needs).
 - Whether the person requiring the adapted accommodation is currently primarily resident in a property which meets their needs for adapted accommodation.

- 5.6 Where it is identified that the applicant has stated that they require a property with disabled facilities the application will be held pending a decision on whether to consider that applicant as a disabled category applicant. These applications will be held to ensure suitable accommodation is considered and all relevant information has been received.
- 5.7 In considering the correct type of property for the applicant regard may be given to the bedroom entitlement of the applicant where it is identified that the applicant requires an additional/separate bedroom due to their health needs.
- 5.8 In accordance with **Section 7**, offers of adapted accommodation will be made outside the Homes by Choice Scheme after being identified as suitable for disabled applicants.
- 5.9 When a property is identified as adapted, meeting the minimum criteria for an adapted property, it may be considered for an applicant with an applicant category D as follows:-
- An applicant whose needs for disabled facilities best match the disabled facilities in the property.
 - Where the property with disabled facilities is in the applicants' area of choice.
- 5.10 Any offer of an adapted property may be ratified by an Occupational Therapist or other medical practitioner who is involved in the case and can verify that the property meets the needs of the applicant.
- 5.11 Where two or more applicants are best matched to the property on an equal needs basis the overriding factor will be the size of accommodation which best meets the household size of the applicant and if equal in terms of size then in date of application order.

APPENDIX 6 - WELFARE ASSESSMENTS

- 6.1 At the point of the application assessment by a Tai Tarian appointed person an applicant will provide details of their housing need. Under the banding scheme a number of needs factors may be considered, one of which may be in relation to the welfare needs of the applicant.
- 6.2 Where the applicant has declared to a Tai Tarian appointed person that they have welfare needs which are affected by their present housing circumstances a Tai Tarian appointed person will ask the applicant for their particular welfare needs to determine the level of welfare need using the relevant factors in the banding scheme.
- 6.3 When assessing the welfare needs of the applicant a Tai Tarian appointed person will have regard to the applicant's current housing circumstances and how their welfare is affected by this. In addition to this, a Tai Tarian appointed person may consider a number of factors which may affect the type of accommodation and area of preference requested by the applicant to determine whether such a move will benefit the applicant on welfare grounds.
- 6.4 The level of welfare need is determined by the details within the banding scheme as follows:-
- **WELFARE CASE URGENT** – Deemed to have a very high social circumstance that is seriously affected by current housing.
 - **WELFARE CASE HIGH – MOVING HOME WILL BENEFIT APPLICANT** – applicant and/or members of their household who have a serious social circumstance that would be significantly improved by moving to suitable accommodation.
 - **WELFARE CASE MEDIUM** - applicant and/or members of their household who have a minor social circumstance that would be improved by moving to suitable accommodation.
- 6.5 Where Tai Tarian considers that the applicant may be placed in the Urgent Band – Urgent Need, due to their welfare condition, Tai Tarian consider the information submitted to decide whether the case meets the criteria in the highest band, the Urgent Band.
- 6.6 Where the above applies the application may be held until the welfare assessment referral has been considered.
- 6.7 Where welfare needs has been identified a request may be made for further information from the applicant to support the application. This information may be from an external agency who is involved in the case such as, Social Services, Support Agency, health or other professionals (such as the Police, Victim Support or any other agency involved).
- 6.8 If an applicant informs Tai Tarian of a change in their circumstances which may affect their priority on the banding scheme on welfare grounds a review of their application will be made and a revised decision on their banding priority made. This could result

in their application moving up a band(s) staying the same/moving down a band(s).
Until this review is completed the application may be held pending a decision.

APPENDIX 7 - HEALTH ASSESSMENTS

- 7.1 At the point of the application assessment by a Tai Tarian appointed person, an applicant will provide details of their housing need. Under the banding scheme a number of needs factors may be considered, one of which may be in relation to the health needs of the applicant.
- 7.2 Where the applicant has declared to a Tai Tarian appointed person that they have health needs which are affected by their present housing circumstances a Tai Tarian appointed person will ask the applicant for their particular health needs to determine the level of health need using the relevant factors in the banding scheme.
- 7.3 When assessing the health needs of the applicant, a Tai Tarian appointed person will have regard to the applicant's current housing circumstances and how their health is affected by this. In addition to this a Tai Tarian appointed person will consider the type of accommodation requested by the applicant to determine whether such a move will benefit the applicant on health grounds.
- 7.4 The level of health need is determined by the details within the banding scheme as follows:-
- **HEALTH CASE URGENT** – applicant and/or members of their household with severe health needs who are seriously affected by current housing - hospital discharge, currently receiving palliative care, has a life limiting condition, or permanent substantial disability that makes existing accommodation unsuitable.
 - **HEALTH CASE HIGH – MOVING HOME WILL GREATLY BENEFIT APPLICANT** – applicant and/or members of their household who have a serious health ailment(s) or disability, but who are not housebound, or whose health, or safety is not at such a risk level to require immediate re-housing. Serious health ailments would be significantly improved by moving to suitable accommodation.
 - **HEALTH CASE MEDIUM** - applicant and/or members of their household who have a minor health ailment that would be improved by moving to suitable accommodation.
- 7.5 Where Tai Tarian considers that the applicant may be placed in the Urgent Band – Urgent Need, due to their health condition, Tai Tarian consider the information submitted to decide whether the case meets the criteria in the highest band, the Urgent Band.
- 7.6 Where the above applies the application may be held until the health assessment referral has been considered.
- 7.7 Where health needs have been identified a request may be made for further information from the applicant to support the application. This information should be from a qualified medical practitioner, Support Provider or Occupational Therapist.

- 7.8 Where an applicant requests an additional bedroom on health grounds that request will be considered in line with the bedroom entitlement criteria in the property type and size eligibility assessment.
- 7.9 Where the application assessment determines that the applicant should be considered for a certain type of accommodation on health grounds they should only bid for properties that meet their health need. Any bid for accommodation that does not alleviate their health need may be refused.
- 7.10 If an applicant informs Tai Tarian of a change in their circumstances which may affect their priority on the banding scheme on health grounds a review of their application will be made and a revised decision on their banding priority made. This could result in their application moving up a band(s)/staying the same/moving down a band(s). Until this review is completed the application may be held pending a decision.
- 7.11 Where an applicant has stated that they need a property with disabled facilities a health assessment will be completed to determine whether the applicant should be considered for adapted disabled accommodation in accordance with **Section 7** of this policy. A referral may be made to an Occupational Therapist or other relevant medical practitioner who may contact the applicant prior to presenting a recommendation on the case. Until a decision is made on the case the application may be held.
- 7.12 Where the decision is made that the applicant should be considered for adapted disabled accommodation, their details will be retained on an additional list of applicants who require disabled facilities. Offers of adapted accommodation will be made outside the Homes by Choice Scheme after being identified as suitable for disabled applicants. See **Section 7** and **Appendix 5**.

APPENDIX 8 - ENVIRONMENTAL HEALTH ASSESSMENTS

8.1 Assessment Request

- 8.1.1 The Council's Environmental Health Department in accordance with their responsibilities for enforcing environmental health legislation, will where appropriate, conduct assessments for applicants relating to insanitary, overcrowded or unsatisfactory housing conditions.
- 8.1.2 Paragraph 3.30 of the Code of Guidance for Local Authorities on the Allocation of Accommodation and Homelessness March 2016 states that in considering whether an applicant should be given reasonable preference as a result of insanitary, overcrowded or unsatisfactory housing conditions, a Local Authority should take into account the law governing overcrowding (Part 10 of the Housing Act 1985), legislation covering houses in multiple occupation (Part 2 of the Housing Act 2004) and the Housing Health and Safety Rating System (Part 1 of the Housing Act 2004).
- 8.1.3 The landlord, managing agent or owner are legally responsible for resolving insanitary, overcrowded or unsatisfactory housing conditions, unless the circumstances have been caused or worsened by the occupiers or visitors to the property. It is therefore only in exceptional cases where Environmental Health will intervene using their statutory powers under the Housing Acts.
- 8.1.4 For the purposes of the assessment of housing conditions, Environmental Health will have regard to the standards contained in the Housing Acts and will make assessments on the facts known, which in most cases will not require a visit to the applicants property.
- 8.1.5 The Environmental Health assessment check will include the following stages:

Stage 1 – Obtain information from the applicant relating to the insanitary, overcrowded or unsatisfactory housing conditions, including the circumstances giving rise to the housing conditions and any evidence that the matters have been reported to the landlord, agent or property owner.

Stage 2 – Carry out checks to establish if the landlord, agent or property owner is registered with Rent Smart Wales or is a Registered Social Housing provider. *Note: Where the responsible person has not registered with Rent Smart Wales or is not a Registered Social Landlord, Environmental Health will make an inspection of the applicant's property.*

Stage 3 - Make contact with the person responsible for rectifying the reported matters and obtain information about the housing conditions and identify the remedial action required including a timescale for completion. *Note: Where there is the possibility of a significant risk to the health and safety of the applicant and the person responsible has a history of non-compliance, Environmental Health will make an inspection of the applicant's property.*

Stage 4 – Using the assessment check and having regard to the facts provided, Environmental Health will where appropriate provide Tai Tarian with notification of the assessment which has been carried out.

- 8.1.6 The applicant is to evidence they have assisted with meeting the requirements of stages 1-3 of the process prior to a decision being made at stage 4, should it be required.
- 8.1.7 The circumstances which are considered when assessing housing conditions are contained in the Housing Need Bands and **Appendix 3**. A band award for an applicant will take into account an Environmental Health assessment provided by the Environmental Health Department. Such an assessment is based on the future risk to the health and safety of the applicant and where there is no prospect of the issue being remedied in a period of time that Environmental Health consider reasonable.

APPENDIX 9 – DECISION REVIEWS

9.1 Review Request

9.1.1 An applicant has the right to request a review of the following decisions made by Tai Tarian where they are able to provide the appropriate supporting information in support of their request:-

- For homeless applicants, the outcome of the assessment carried out under section 62 of the HWA Eligibility for accommodation – including decisions relating to eligibility on the grounds of the applicant’s immigration status and unacceptable behaviour.
- The band awarded to the applicant.
- The property size that is considered suitable for the applicant.
- Any decision about the facts of the case which is likely to be, or has been taken into account in considering whether to allocate accommodation to the applicant.
- Refusal to accept a bid from the applicant for particular premises.
- A decision under **Section 5** not to award some or all of the priority that the applicant would otherwise have been entitled due to their previous ‘unreasonable behaviour.’
- Any changes in banding or category decisions made by Tai Tarian after review.

A decision under **Section 4.10.2** as follows:-

- Allow the applicant to bid for properties but on the condition that an offer of accommodation will only be made where the applicant accepts tenancy support/intensive management from the start of the tenancy; or
- Allow the applicant to be considered for specialist accommodation that may only be found through supported housing and in certain areas allocated outside the Lettings Scheme. This may involve referring the applicant to another organisation so that suitable accommodation can be considered.

9.1.2 An applicant will receive information advising of their right to request a review of the above decisions. Any applicant wishing to request a review should be advised to seek legal advice from a solicitor, Law Centre, Housing Aid Centre or the Citizens Advice.

9.1.3 An applicant is provided with **21 days** to request a review from the date of the letter informing them of Tai Tarian’s decision, unless the review request is made against the decision by Tai Tarian to refuse (under **Section 6.16** or any other provision of the scheme) a bid made by the applicant for a property.

9.1.4 This request must be made in writing to Tai Tarian, stating the reasons why they would like the decision to be reviewed and provide additional information in support of their request.

- 9.1.5 If the review request is received after the 21 day period then it will not normally be heard, unless there are exceptional circumstances agreed by Tai Tarian that have prevented the request from being lodged within the specified period.
- 9.1.6 In the case of a review in respect of a bid for a property, any request for a review must be made within 48 hours of the application being notified of the decision. This is necessary to ensure properties are not left unallocated.
- 9.1.7 An applicant who submits a request for review shall be informed of the right to choose between a review by written submissions or by an oral review.
- 9.1.8 Reviews will be undertaken by a Tai Tarian appointed person who was not involved in the original decision and is more senior than the person who made the original decision.
- 9.1.9 In cases where the Council owes a duty to the applicant under Section 75 of the HWA but a decision is made that the applicant is excluded from the scheme or is given reduced preference due to unreasonable behaviour then the Council's Housing Options Team will be notified of the decision and a review will be undertaken by a panel, comprising of a representative from Tai Tarian and a representative from the Housing Options Team. The final decision on the review will be made by the Tai Tarian representative, although they will have regard to any representations made by the Housing Options Team representative.
- 9.1.10 In all cases (other than reviews to bidding decisions) the review request must be completed within 28 days from the date the applicant lodges their request for review.
- 9.1.11 In cases of bidding decisions, the review must be completed within 48 hours of the applicant lodging the request for a review.

9.2 The Oral Hearing

9.2.1 The applicant will be informed of their right to:-

- Be heard.
- Be accompanied.
- Be represented by another person, whether the person is professionally qualified or not. For the purpose of the proceedings any representative should have the rights and powers which the applicant has.
- Call any supporting witness to give evidence. There is no power to require witnesses to attend.
- Put questions to any person who gives evidence at the hearing.
- Make representations in writing.

9.2.2 The applicant will be given at least five clear days' notice of the date, time and venue for the hearing, unless the applicant agrees to a shorter period.

- 9.2.3 The review will consider the circumstances of the applicant at the time of the review, not just at the time of the original decision.
- 9.2.4 The review process may decide to adjourn the hearing to obtain any additional evidence on the applicant.
- 9.2.5 The applicant will be notified of the decision following the review. If the decision is to uphold the original decision, the decision notice will also notify the applicant of the reasons for the decision.
- 9.2.6 An unsuccessful applicant on review as to eligibility will be notified of their right to make a fresh application under Section 160A (11) if they consider they should no longer be treated as ineligible.

9.3 **Written Submission**

- 9.3.1 Upon receipt of a request for review by way of a written submission the review will consider the circumstances both at that time and when the original decision was made.
- 9.3.2 The applicant must be told the date when all written information to be reviewed must be lodged with Tai Tarian.
- 9.3.3 The applicant will be notified of the decision following the review. If the decision is to confirm the original decision, the decision notice will also notify the applicant for the reasons for the decision.
- 9.3.4 An unsuccessful applicant on review as to eligibility will be notified of their right to make a fresh application under Section 160A (11) if they consider they should no longer be treated as ineligible.

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Integrated Impacts Assessment

This Integrated Impact Assessment considers the duties and requirements of the following legislation in order to inform and ensure effective decision making and compliance:

- Equality Act 2010
- Welsh Language Standards (No.1) Regulations 2015
- Well-being of Future Generations (Wales) Act 2015
- Environment (Wales) Act 2016

1. Details of the initiative

	Title of the Initiative: Consultative draft NPTCBC/Tai Tarian Shared Lettings Policy 2021
1a	Service Area: Adult Services / Housing Homelessness
1b	Directorate: SSH&H
1c	Summary of the initiative: The Shared NPTCBC/Tai Tarian Lettings Policy is due for review every two years but had last been reviewed in 2015. The recently completed review of the Policy began in early 2018 and an initial consultative draft reviewed document first produced in late 2019, but was only finalised this year, because of the pandemic.
1d	Who will be directly affected by this initiative? Tai Tarian initial housing & transfer applicants
1e	When and how were people consulted? A Project group comprised of designated Tai Tarian Officers, including 1 st and 2 nd tier management, as well as Council senior staff from the SSH&H Commissioning, Housing & Homelessness, Environmental Health & Trading Standards, and Legal Services teams, met a number of times to review the 2015 Policy and agree a consultative draft reviewed document. A three-month formal public consultation exercise has recently been undertaken on that document and further changes made to reflect the outcome of the exercise.

1f	What were the outcomes of the consultation? The consultative draft has gone through a number of iterations as deliberations have progressed and the final consultative draft represents the consensus reached amongst members of the Project Group. A report on the outcome of the recent 90-day consultation exercise is being reported to HSC&W Cabinet Board.
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Version Control

Author	Job title	Date
Gareth Evans	Commissioning Officer - Housing & Homelessness	17.11.21

2. Evidence

What evidence was used in assessing the initiative?

All relevant applicant equalities data that Tai Tarian were able to provide was considered. However, this data only related to around 10% of the nearly 4,000 applicants, either already on the Council/Tai Tarian common Homes by Choice housing register, or awaiting the assessment of their recent application, as at 6 May 2021: that is those who opted to provide the relevant information. It therefore provides a useful indication but cannot be held to be conclusive in respect of all applicants.

The prioritisation of applicants under the banding system in the Joint Lettings Policy is not in any way affected by an applicant's gender, marital/civil partnership status, race, religion/belief, sex, or sexual orientation. Similarly, these factors have no bearing on how competing bids are treated in determining who is allocated any particular vacant property.

Age is however to some extent relevant in that “Older Person” is a category of housing-registered applicant & Tai Tarian have “Older Person Designated” housing stock. At the time of the 2011 census, 31% of the 16+ local population was over 60, as were 25% of Tai Tarian tenants (this was the year of shadow transfer of the Council’s housing stock to Tai Tarian - then NPT Homes). As at 6 May 2021, however, less than 5% of Tai Tarian’s total housing stock was older person designated but 10% of those on the NPTCBC/Tai Tarian Homes by Choice common housing register had been assessed as eligible for same. There is no more recent older person population estimate that includes the 60-64 age group to compare this to. However, the draft report of a recent housing need assessment exercise indicates that, although the number of persons in most groups aged under 60 is expected to reduce over the 15-year period 2018-2033, increases are projected for each group aged 65 and over.

“Disabled” is also a category of housing-registered applicant & Tai Tarian have “Disability-adapted” housing stock. At the time of the 2011 census, 28% of the local population considered themselves to be experiencing some degree of life-limiting long-term illness. As at 6 May 2021, nearly 16% of applicants who provided any equalities information similarly self-classified, but only nearly 6% considered themselves to have a physical disability that could be assumed to require adapted accommodation, whereas 10% of those on the Council/Tai Tarian Homes by Choice common housing register were in fact assessed as eligible for disability adapted accommodation.

With regard to pregnancy & maternity, a pregnant woman is afforded additional consideration in terms of the bedroom-size of vacant property for which her household is eligible to bid. There is however no wider contextual statistical information readily available and neither is it possible to readily determine to how many Tai Tarian applicants this applies. However, this is a positive factor that remains unchanged in the reviewed document.

3. Equalities - a) How does the initiative impact on people who share a protected characteristic?

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Protected Characteristic	+	-	+/-	Why will it have this impact?
Age	X			“Older Person” is a category of housing-registered applicant & Tai Tarian have “Older Person Designated” housing stock.
Disability	X			“Disabled” is a category of housing-registered applicant & Tai Tarian have “Disability-adapted” housing stock
Gender reassignment			X	An applicant’s gender does not affect their eligibility either to get on the housing register or to bid for properties once they are.
Marriage & civil partnership			X	An applicant’s marital or civil partnership status does not affect their eligibility either to get on the housing register or to bid for properties once they are.
Pregnancy and maternity	X			A pregnant woman is afforded additional consideration in terms of the bedroom-size of vacant property for they are eligible to bid.
Race			X	An applicant’s race does not affect their eligibility either to get on the housing register or to bid for properties once they are.
Religion or belief			X	An applicant’s religion/belief does not affect their eligibility either to get on the housing register or to bid for properties once they are.
Sex			X	An applicant’s sex does not affect their eligibility either to get on the housing register or to bid for properties once they are.
Sexual orientation			X	An applicant’s sexual orientation per se does not affect their eligibility either to get on the housing register or to bid for properties once they are.

What action will be taken to improve positive or mitigate negative impacts?

There are no currently known or anticipated negative impacts on any applicant household by virtue of the protected characteristics of any household member, and the potential positive impacts appear to be maximised as far as is currently possible, but the coverage of the available equalities data is limited.

Tai Tarian will therefore continue in their efforts to improve the range and scope of equalities data collection at the initial housing application stage.

The Council's retained housing service will be mindful of the data relating to older people and people with a life-limiting illness or disability when planning for the delivery of affordable housing and housing related support services.

b) How will the initiative assist or inhibit the ability to meet the **Public Sector Equality Duty**?

Public Sector Equality Duty (PSED)	+	-	+/-	Why will it have this impact?
To eliminate discrimination, harassment and victimisation	X			The Policy in no way gives rise to or reinforces discrimination, harassment or victimisation but rather aims to prevent them in so far as it can by prioritising victims and de-prioritising (in extreme cases even potentially excluding) perpetrators.
To advance equality of opportunity between different groups	X			The policy has to afford greater priority to certain categories of applicant than it does others but it does so irrespective of their relative protected characteristics and therefore fundamentally demonstrates equality of opportunity.

To foster good relations between different groups	X			The policy fosters good relations in that it aims to create sustainable communities in which people want to live as far as is possible.
What action will be taken to improve positive or mitigate negative impacts?				
There are no currently known or anticipated negative impacts and the potential positive impacts are maximised as far as is currently possible.				

4. Community Cohesion/Social Exclusion/Poverty

	+	-	+/-	Why will it have this impact?
Community Cohesion	X			Adequate housing is acknowledged to impact positively on community cohesion.
Social Exclusion		X		Adequate housing is acknowledged to mitigate against community exclusion.
Poverty		X		Adequate housing is acknowledged to mitigate against poverty.
What action will be taken to improve positive or mitigate negative impacts?				
There are no currently known or anticipated negative impacts and the potential positive impacts are maximised as far as is currently possible.				

5. Welsh

	+	-	+/-	Why will it have this effect?
What effect does the initiative have on: – people’s opportunities to use the Welsh language	X			Tai Tarian welcome correspondence in Welsh and deal with Welsh and English correspondence to the same standards and timescales.
– treating the Welsh and English languages equally	X			
What action will be taken to improve positive or mitigate negative impacts?				
There are no currently known or anticipated negative impacts and the potential positive impacts are maximised as far as is currently possible.				

6. Biodiversity

How will the initiative assist or inhibit the ability to meet the **Biodiversity Duty**?

Biodiversity Duty	+	-	+/-	Why will it have this impact?
To maintain and enhance biodiversity			X	The allocation of housing association has no direct impact on biodiversity.
To promote the resilience of ecosystems, i.e. supporting protection of the wider environment, such as air quality, flood alleviation, etc.			X	
What action will be taken to improve positive or mitigate negative impacts?				
There are no currently known or anticipated negative impacts and the potential positive impacts are maximised as far as is currently possible.				

7. Well-being of Future Generations

How have the five ways of working been applied in the development of the initiative?

Ways of Working	Details
i. Long term – looking at least 10 years (and up to 25 years) ahead	Adequate housing is acknowledged to be a cross-cutting theme that impacts positively on all our wellbeing objectives
ii. Prevention – preventing problems occurring or getting worse	Adequate housing is acknowledged to be a cross-cutting theme that impacts positively on all our prevention objectives
iii. Collaboration – working with other services internal or external	The Council & Tai Tarian have co-produced the document which has been the subject to a formal comprehensive 90-day public consultation exercise
iv. Involvement – involving people, ensuring they reflect the diversity of the population	
v. Integration – making connections to maximise contribution to:	
Council’s well-being objectives	Adequate housing is acknowledged to be a cross-cutting theme that impacts positively on all our wellbeing objectives
Other public bodies objectives	

8. Monitoring Arrangements

Provide information on the monitoring arrangements to:

Monitor the impact of the initiative on Equalities, Community Cohesion, the Welsh Measure, Biodiversity Duty and the Wellbeing Objectives.

The Policy will be due for a further review in five years at which point a further full IAA will be undertaken
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9. Assessment Conclusions

Please provide details of the conclusions reached in relation to each element of the assessment:

	Conclusion
Equalities	There are no currently known or anticipated negative impacts and the potential positive impacts are maximised as far as is currently possible.
Community Cohesion/ Social Exclusion/Poverty	
Welsh	
Biodiversity	
Well-being of Future Generations	

Overall Conclusion (please indicate the conclusion reached):

Continue - as there are no currently known or anticipated negative impacts and the potential positive impacts are maximised as far as is currently possible

Please provide details of the overall conclusion reached in relation to the initiative:

The document represents the consensus of all the Council & Tai Tarian officer members of the project group that developed it and it has subsequently been the subject of a 90-day public consultation exercise which did not add anything to the substance of this assessment as conducted prior to it.

The summary assessment of those officers was that it will have no currently known or anticipated negative impacts on applicant households by virtue of the protected characteristics of any household member and that the potential positive impacts are maximised as far as is currently possible.


The recommendation to Members is therefore that the document is approved.

10. Actions

What actions are required in relation to obtaining further data/information, to reduce or remove negative impacts or improve positive impacts?

Action	Who will be responsible for seeing it is done?	When will it be done by?	How will we know we have achieved our objective?
The coverage of the currently-available equalities data is limited so Tai Tarian will continue in their efforts to improve the range and scope of equalities data collection at the initial housing application stage.	Tai Tarian	2022	There will be greater coverage in the equalities data available to inform the next joint Council / Tai Tarian review of the Policy.
The Council's retained housing service will be mindful of the data relating to older people and people with a life-limiting illness or disability when planning for the delivery of affordable housing and housing related support services.	The Council's Social Services Commissioning Unit and Housing & Homelessness Services	Ongoing	Commissioning arrangements in respect of affordable housing / housing related support services for older people and people with a life-limiting illness and disability will be better informed.

11. Sign-off

	Sign	Name	Position	Date
Completed by:		Gareth Evans	Commissioning Officer - Housing & Homelessness	17.11.21
Signed off by		Angela Thomas	Head of Adult Services	17.11.21

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Cyngor Castell-nedd Port Talbot
Neath Port Talbot Council

NEATH PORT TALBOT COUNTY BOROUGH COUNCIL NEATH PORT TALBOT SOCIAL CARE HEALTH & WELL-BEING CABINET BOARD

9th December 2021

Report of the Head of Adult Services - Angela Thomas

Matter for Decision

Wards Affected All Wards

DEVELOPMENT OF INDEPENDENT LIVING HUB AT B'SPOKED

Purpose of the Report

This report is to seek Members approval to enter into a 90-day consultation period to develop an Independent Living hub at B'spoked where people can learn new and develop existing skills in a safe environment.

Executive Summary

B'spoked is a training and employment centre the purpose of which is to provide people who have low to moderate learning disabilities the opportunity to develop employment and training skills which they can use to move on to other training and employment opportunities.

It is proposed to enhance the training and employment model and develop it to become an independent living hub by creating two new training flats where people can develop daily living and independence skills and where assessments can be carried out by practitioners. This will take place alongside the continuation of some of the existing workshop groups where people can develop work based skills,

especially those that will benefit the individual and the local community, i.e. cycle workshop, woodwork, café and cooking. Arts and crafts will no longer be available at B'spoked as during the pandemic people have been successfully supported to engage in arts and crafts projects at home with on line support, and this will continue. People will also be signposted and supported to attend local community arts and crafts groups.

B'spoked is currently a resource aimed at people aged from 16-66 but the aim is to make the service available to younger people from 14+ who are in transition from Childrens to Adult Services and offer them the opportunity to develop independent living skills.

Background

The purpose of B'spoked is to provide opportunities for people with low to moderate learning disabilities to develop employment based skills in order for them to move on to other training, employment or community based activities. However, it has evolved over the years for some people to become a long term day service despite the aim of B'spoked being to support people to transition to other opportunities.

The current building which is located at Neath Abbey will be adapted to include areas where people can be supported by staff to develop new and build on existing skills, as well as skills which will enable them to progress to other training opportunities or employment. The newly created areas will include two training flats, each with a kitchen, bathroom, living room and bedroom (although these areas will not provide accommodation for people to live in but will be a training facility). Use of assistive technology will be facilitated by including up to date equipment within the training flats to enable people to try this equipment and devices and develop the skills to use this technology within their own environment.

The new resource will also enable social care practitioners to assess people's skills and abilities, and in line with their personal outcomes develop person centred care plans.

The plan also includes improving the existing IT provision within B'spoked to support more people to develop IT skills. This will also support independent living building on the skills people have used during the Covid-19 pandemic and recognising that social media plays a significant role in promoting friendships and relationships alongside managing finances and budgeting, paying bills, ordering shopping etc.

The facility will also be designed to meet the needs of young people aged 14+ in transition to adulthood who will also be able to use the resource to develop their skills. It is anticipated that their parents/carers will also be able to access the service to enable families and young people to work together with support from professionals, to enable young people to develop the skills required for independent living and community participation. Social care practitioners will be able to gain an understanding of a young person's ability and resilience whilst working alongside parents and carers to increase their confidence in the young person's skills and choices.

The support will be provided by the existing staff group from Bspoked who hold relevant teaching or training qualifications e.g. teacher training, PTTLs or equivalent. This group of staff will continue to deliver the workshops currently in place but will each focus some of their time to deliver the new programme of work with aim being to encourage people to develop independent living skills.

Social Services Transport has traditionally been available to transport service users from their homes to Bspoked. Many of these individuals use public transport or have access to their own transport and use of these methods of transport will be encouraged where appropriate as part of their independent living plan.

Financial Impacts

There will be a cost implication in developing the building to create the areas within the building which will replicate a living environment.

The estimated costs of remodelling the current premises are around £100,000 which includes fireproofing the area around the kitchen so that the upstairs area can be used for a training apartment. This cost will also include upgrading the existing IT provision, and reconfiguring and replacing the toilet blocks.

A bid has been made for this money from ICF capital funding, but there is no guarantee that this will be awarded and so funds may be required from Local Authority capital budgets. A local company have also agreed to make some improvements to one of the designated flats as part of their community programme at no cost to the Local Authority. Should funding be agreed from the ICF capital funding bid the work by the local company will be enhanced to improve the flat.

If this project does not go ahead due to lack of funds it is likely that the opportunity to develop the Independent Living Hub will be lost or delayed. More people with learning disabilities will become dependent on care being provided to them rather than their skills being developed and reducing their need for long term care. People with learning disabilities will also be denied the opportunity to reach their potential.

The cost of the current service per annum is £473,870 with an additional £201,009 spent on transport. No additional revenue funding is being sought.

Integrated Impact Assessment

An Integrated Equality Impact screening assessment on seeking approval to consult in respect of making the proposed changes to Bspoked to create an independent living hub has been undertaken to assist the Council.

A first stage impact assessment has been undertaken to assist the Council in discharging its legislative duties (under the Equality Act 2010, the Welsh Language Standards (No.1) Regulations 2015, the Well-being of Future Generations (Wales) Act 2015 and the

Environment (Wales) Act 2016. The first stage impact assessment has indicated that a more in-depth assessment was required.

An overview of the Integrated Impact Assessment has been included below in summary form only and it is essential that Members read the Integrated Impact Assessment, which is attached to the report at Appendix 1, for the purposes of the meeting.

Valleys Communities Impacts

The service at Freshstart in Croeserw will remain in place to serve the people who live in that area. Bspoked will remain available to all eligible people. Transport needs will be taken into account and alternative opportunities to promote independent travel will be explored.

Workforce Impacts

There are no post deletions suggested in this proposal and staff will remain on their current grades undertaking the same type of work but with a clear focus on supporting individuals to develop independent living skills alongside the skills they develop with a view to progressing on to work and training. Their job descriptions will focus on this element of work and therefore a formal management of change and consultation with the staff will be required. The staff already have relevant training or teaching qualifications and additional training will be provided to them to support their Continued Professional Development.

Legal Impacts

No implications.

Risk Management Impacts

As this document seeks approval for a consultation period only there are no notable impacts.

Consultation

This report seeks members' approval to enter into a full 90-day public consultation involving all stakeholders.

Recommendations

That members approve a formal 90-day public consultation period in relation to the future model of service delivery at Bspoked and the development of the Independent Living Hub, in principle, subject to the award of funding.

Reasons for Proposed Decision

- a) To enhance the service to support people with low to moderate learning disabilities to develop independent living skills alongside the skills they may need to progress to work or training.
- b) To support people to reach their potential.
- c) To reduce peoples' need for statutory care and support.

Implementation of Decision

The decision is proposed for implementation after the three day call in period.

Appendices

Appendix 1: Integrated Impact Assessment

Appendix 2: Consultation Strategy

Appendix 3: Easy Read document

Officer Contact

Angela Thomas, Head of Service – Adult Services
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Sue Bradshaw, Principal Officer – Direct Services
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Integrated Impact Assessment (IIA)

This Integrated Impact Assessment considers the duties and requirements of the following legislation in order to inform and ensure effective decision making and compliance:

- Equality Act 2010
- Welsh Language Standards (No.1) Regulations 2015
- Well-being of Future Generations (Wales) Act 2015
- Environment (Wales) Act 2016

Version Control

Version	Author	Job title	Date
e.g. Version 1	Sue Bradshaw	Principal Officer	29.10.21

1. Details of the initiative

	Title of the Initiative: Development of an Independent Living Hub at B'spoked.
1a	Service Area: Adult Services
1b	Directorate: Social Services, Health and Housing
1c	Summary of the initiative: To develop an Independent Living hub at B'spoked where people can learn new and develop existing skills in a safe environment.
1d	Is this a 'strategic decision'? No
1e	Who will be directly affected by this initiative? Service users, parents and carers, staff who work at B'spoked.
1f	When and how were people consulted? Permission is being sought to carry out a 90 day consultation, consisting of various means including co-production workshops with service users, carers, staff and other stakeholders.

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1g	What were the outcomes of the consultation? N/A

2. Evidence

What evidence was used in assessing the initiative?

Social Services routinely collects data as part of the assessment/review process of individuals and carers, which is reported annually to Welsh Government.

Information from HR on staff has been used however this information has not been reproduced in this Impact Assessment as the low number of people could result in identification.

In addition to the number of people accessing the services, limited equalities data such as age, disability, ethnicity and sex is also collected, which in turn informs policy development and service provision. The following provides a summary of information known about current users of Learning Disability Services.

The Social Services Client Index shows that there are 82 young people known to the Child Care Disability Team who are in transition to adulthood.

Age Group	Female	Male	Total
14-17	35	47	82

Ethnicity	Female	Male	Total
White British	26	41	67
Welsh	4	8	12
White other	0	1	1
Other black	1	0	1
Not known	0	1	1
TOTAL	31	51	82

The Social Services Client Index shows that there are currently 420 adults with learning disabilities known to Social Services

Age Group	Female	Male	Total
18	2	4	6
19	1	5	6
20's	47	76	123
30's	32	46	78
40's	19	24	43
50's	35	26	61
60's	23	32	55
70's	20	16	36
80's	10	1	11
90's	1	0	1
TOTAL	190	230	420

Ethnicity	Female	Male	Total
White British	177	205	382
Welsh	7	20	27
White other	0	1	1
Other black	0	1	1
Other mixed	0	1	1
Not known	5	2	7
Other	1	0	1
TOTAL	190	230	420

3. Equalities

a) How does the initiative impact on people who share a **protected characteristic**?

Protected Characteristic	+	-	+/-	Why will it have this impact?
Age			x	Data shows that a high number of carers have a protected characteristic by virtue of their age. Access to support services at B'spoked is unlikely to be solely due to a person's age. However, personal circumstances relating to a person's age may have an impact on how support is delivered or the level/type of support required.

Disability			x	<p><u>Service users</u> All service users will have a disability, the proposal intends to have a positive impact as it will help those with disabilities to develop daily skills that support them to live more independently. This will help improve equality for those with a disability as service users will be afforded more choice and control over their lives</p> <p>An aspiration for having your own front door, living as independently as possible and being able to access flexible, targeted support came over as a strong desire for many adults with a learning disability. (Welsh Government Learning Disability Improving Lives Programme June 2018)</p> <p><u>Carers</u> There is no available data to show that carers with a disability may be more disproportionately impacted. The consultation process will help to identify if there is a need to implement any mitigating actions due to the proposal having an adverse impact on carers with this characteristic.</p> <p><u>Staff</u> Data indicates that some staff may have a disability. A training needs assessment and an identification of reasonable workplace adjustments will be implemented to ensure that they receive the necessary support to transition into new roles.</p>
Gender reassignment			x	Access to support services is unlikely to be solely due to a person's gender identity. However, personal circumstances relating to a person's gender identity may have an impact on how support is delivered or the level/type of support required.
Marriage & civil partnership			x	Access to support services is unlikely to be solely due to a person's marital status or partnership. However, personal circumstances relating to a person's marital status or relationship may have an impact on how support is delivered or the level/type of support required.

			Unpaid carers are often family members/partners of the person being cared for, which can have an impact on relationships and cause difficulties in maintaining the caring role as well as their personal relationships.
Pregnancy and maternity		x	It is possible that someone accessing services may be, or become, pregnant or be a parent to a young child which could require additional support and development of new skills in living independently. It is also possible that a carer may become pregnant or have a young child, which would need to be taken into account when determining how support is delivered.
Race		x	Access to support is unlikely to be solely due to a person's race. However, personal circumstances relating to a person's race may have an impact on how support is delivered or the level/type of support required.
Religion or belief		x	Access to support is unlikely to be solely due to a person's religion or belief. However, personal circumstances relating to a person's religion or belief may have an impact on how support is delivered or the level/type of support required.
Sex		x	Access to support is unlikely to be solely due to a person's sex. However, personal circumstances relating to a person's sex may have an impact on how support is delivered or the level of support required.
Sexual orientation		x	Access to support is unlikely to be solely due to a person's sexual orientation. However, personal circumstances relating to a person's sexual orientation may have an impact on how support is delivered or the level of support required.

What action will be taken to improve positive or mitigate negative impacts?

By undertaking a consultation process we will be able to better understand how a person's protected characteristics impacts them in accessing support to develop their independent living skills, in particular those with a learning disability who are likely to be the main users of this initiative.

A project group will be established and will address any issues that may arise to ensure any unidentified negative impacts are addressed. We will undertake a review of the implementation of the new service at 6 months and we will include consideration of equalities duties in this evaluation.

b) How will the initiative assist or inhibit the ability to meet the **Public Sector Equality Duty**?

Public Sector Equality Duty (PSED)	+	-	+/-	Why will it have this impact?
To eliminate discrimination, harassment and victimisation	x			The proposal will help to support people with learning disabilities to live within our communities and access the support they need which supports the Council in meeting its PSED. It will support Carers to have time to themselves to integrate and be part of their communities. This will help to prevent discrimination, harassment and victimisation by enabling Carers to engage in social activities and develop and maintain peer/friendship groups.
To advance equality of opportunity between different groups	x			This proposal supports the council in taking forward its statutory duties with regards to social services in particular people with learning disabilities and young people in transition to adulthood, which further it in discharging its Public Sector duties. Carers will be supported to have time to themselves to integrate and be part of their communities. This will help to promote equality of opportunity by enabling Carers to engage in social activities and develop and maintain peer/friendship groups.
To foster good relations between different groups	x			This proposal supports the council in taking forward its statutory duties with regards to adult social services, which further it in discharging its Public Sector duties. One of the aims of the work of B'spoked is to develop and maintain strong links with community initiatives. Carers will be supported to have time to themselves to integrate and be part of their communities. This will help to promote good relations between different groups by enabling Carers to engage in social activities and develop and maintain peer/friendship groups.

Tudalen211

What action will be taken to improve positive or mitigate negative impacts?

The potential impact of this proposal on people with learning disabilities, their carers, and others who may use this resource on PSED has been considered and it has been assessed that overall this initiative will have a positive impact.

This initiative aims to support people with learning disabilities and young people in transition to adulthood to develop the skills they need to live as independently as possible and to reach their potential. This also supports carers by enabling them to have a break from their caring role while the workshops and independent living training are delivered, and by supporting the cared for person to develop and use independent living skills, thus relying less on carers for support.

The consultation will enable people to highlight any unintended consequences of the strategy that may have a negative impact on PSED requirements.

4. Socio Economic Duty

Impact	Details of the impact/advantage/disadvantage
Positive/Advantage	<p>This initiative will have a positive impact as it will support the development of daily living skills, which will help service users to make healthy lifestyle choices, including nutrition, exercise and social activities. This will help improve their socio-economic status.</p> <p>There is no charge to attend this service and as such it is available regardless of socio-economic position.</p>
Negative/Disadvantage	
Neutral	

What action will be taken to reduce inequality of outcome

A project group will be established and will address any issues if they arise to ensure any unidentified negative impacts are addressed. We will undertake a review of the implementation of the new service after 6 months and we will include consideration of equalities duties in this evaluation.

5. Community Cohesion/Social Exclusion/Poverty

	+	-	+/-	Why will it have this impact?
Community Cohesion	x			This proposal will support people with learning disabilities to live more independently and require less formal and informal care thus enabling them to live within their community. The workshops delivered at Bspoked aim to take advantage of community resources and to support individuals to make links with the community. This model of integration is intended to have a positive impact on community cohesion in general.
Social Exclusion	x			Providing carers with respite and other services will support carers by enabling them to have a life alongside caring, to be active members of their communities and socialise with others. The initiative will support people with learning disabilities by enabling them to develop relationships with peers and will also promote links with the community thus creating opportunities to combat social exclusion. Therefore this proposal will have a positive impact on social exclusion
Poverty	x			People with learning disabilities and their carers will be encouraged to access all available welfare benefits. IT workshops will be available to enable people to shop on line, to pay bills and to budget more effectively. This will have a positive impact on poverty.

Tudalen213

What action will be taken to improve positive or mitigate negative impacts?

The Council's Wellbeing Objectives aim to improve the wellbeing of children, young people and adults, as well as the general wellbeing of the area, by developing the local economy and environment.

This proposal should have a positive impact. The consultation will enable people to highlight any unintended consequences of the proposal that may have a negative impact.

6. Welsh

	+	-	+/-	Why will it have this effect?
What effect does the initiative have on: - people's opportunities to use the Welsh language			x	The Council will continue to offer services in Welsh and English.
- treating the Welsh and English languages equally			x	The Council will continue to offer services in Welsh and English.

What action will be taken to improve positive or mitigate negative impacts?

The Council currently has only a small number of staff with Welsh language skills working in the Directorate. However, opportunities for staff to use their language skills are promoted and training made available to those who wish to further develop their skills.

These proposals do not include any planned reduction in human resource at the frontline. It is not therefore anticipated that they will have any effect on the service delivered to those who receive care and support from Adult Services and who wish the service they receive to be delivered through the medium of the Welsh language.

This proposal is written on the assumption that there will be no further financial or human resources available to Adult Services in the next year for this area of service and that therefore, sustaining the current level of equality of treatment, in respect of the Welsh language, is the only realistically achievable aim.

Opportunities for staff to use their language skills will continue to be promoted and training will continue to be made available to those who wish to further develop their skills.

7. Biodiversity

How will the initiative assist or inhibit the ability to meet the **Biodiversity Duty**?

Biodiversity Duty	+	-	+/-	Why will it have this impact?
To maintain and enhance biodiversity			x	Not applicable
To promote the resilience of ecosystems, i.e. supporting protection of the wider environment, such as air quality, flood alleviation, etc.			x	Not applicable

What action will be taken to improve positive or mitigate negative impacts?

Not applicable.

Tudalen216

8. Well-being of Future Generations

How have the five ways of working been applied in the development of the initiative?

Ways of Working	Details
i. Long term – looking at least 10 years (and up to 25 years) ahead	The proposal aims to develop facilities to support people with learning disabilities or those who are leaving care to develop and build on their independent living skills, targeting support to specific groups of people. It also promotes the long term sustainability of service provision in line with the Social Services and Well-being (Wales) Act 2014 and the Well-being of Future Generations (Wales) Act 2015.
ii. Prevention – preventing problems occurring or getting worse	Tailoring services to individual's needs will help improve independence and prevent or reduce the need for more complex care.
iii. Collaboration – working with other services internal or external	The proposal enables the council to make best use of our partnerships with those who are provide support to people with learning disabilities, including partner agencies and the third sector.

<p>iv. Involvement – involving people, ensuring they reflect the diversity of the population</p>	<p>Various staff members and managers have been involved in the development of the proposal.</p> <p>The proposal will be subject, with Members' approval, to a full 90 day consultation to gain stakeholder input, opinion and feedback.</p>
<p>v. Integration – making connections to maximise contribution to:</p>	<p>The workshops at Bspoked are designed to take advantage of community resources and to support individuals to make links with the community.</p> <p>This initiative aims to support people with learning disabilities and young people in transition to adulthood to develop the skills they need to live as independently as possible and to reach their potential. This also supports carers by enabling them to have a break from their caring role while the workshops and independent living training are delivered, and by supporting the cared for person to develop and use independent living skills, thus relying less on informal and formal care.</p> <p>The proposal therefore contributes towards the objective of improving the well-being of adults who live in the county borough and to develop the economy.</p>
<p>Council's well-being objectives</p>	<p>To improve the well-being of all adults who live in the county borough.</p> <p>To develop the economy and the environment so that the well-being of people can be improved.</p>
<p>Other public bodies objectives</p>	<p>Create safe, confident and resilient communities, focusing on vulnerable people.</p> <p>Encourage Ageing Well.</p>

9. Monitoring Arrangements

Provide information on the monitoring arrangements to:

Monitor the impact of the initiative on Equalities, Community Cohesion, the Welsh Measure, Biodiversity Duty and the Wellbeing Objectives.

The 90 day consultation will enable people to highlight any unintended negative consequence of the proposal, which will then be considered when determining whether to continue to recommend it.

10. Assessment Conclusions

Please provide details of the conclusions reached in relation to each element of the assessment:

	Conclusion
Equalities	The consultation process will help us to better understand if a person's protected characteristics impact on them in relation to accessing this service and developing independence skills.
Socio Economic Disadvantage	The Council's Wellbeing Objectives aim to improve the wellbeing of children, young people and adults, as well as the general wellbeing of the area, by developing the local economy and environment. As noted above the proposal should have a positive impact. The consultation will enable people to highlight any unintended consequences of the proposal that may have a negative impact.
Community Cohesion/ Social Exclusion/Poverty	The Council's Wellbeing Objectives aim to improve the wellbeing of children, young people and adults, as well as the general wellbeing of the area, by developing the local economy and environment. As noted above the proposal should have a positive impact. The consultation will enable people to highlight any unintended consequences of the proposal that may have a negative impact.
Welsh	The Council currently has only a small number of staff with Welsh language skills working in the Directorate. However, opportunities for staff to use their language skills are promoted and training made available to those who wish to further develop their skills.

	<p>The proposals in the strategy do not include any planned reduction in human resource at the frontline. It is not therefore anticipated that they will have any effect on the service delivered to those who receive care and support from Adult Services and who wish the service they receive to be delivered through the medium of the Welsh language.</p> <p>The strategy is written on the assumption that there will be no further financial or human resources available to Adult Services throughout the life of the strategy and that therefore, sustaining the current level of equality of treatment, in respect of the Welsh language, is the only realistically achievable aim.</p> <p>Opportunities for staff to use their language skills will continue to be promoted and training will continue to be made available to those who wish to further develop their skills.</p>
Biodiversity	The proposal to develop an Independent Living Hub has no impact on biodiversity.
Well-being of Future Generations	The proposal to develop an Independent Living Hub contributes to the five ways of working.

Overall Conclusion

Please indicate the conclusion reached:

- **Continue** - as planned as no problems and all opportunities have been maximised x
- **Make adjustments** - as potential problems/missed opportunities/negative impacts have been identified along with mitigating actions
- **Justification** - for continuing with the initiative even though there is a potential for negative impacts or missed opportunities
- **STOP** - redraft the initiative as actual or potential unlawful discrimination has been identified

Please provide details of the overall conclusion reached in relation to the initiative

The purpose of the initiative is to support people with learning disabilities and young people in transition to adulthood to develop the skills they need to live as independently as possible and to reach their potential. This also supports carers by enabling them to have a break from their caring role while the workshops and independent living training are delivered, and by supporting the cared for person to develop and use independent living skills, thus relying less on informal and formal care. With Members' permission, the proposal will be subject of a 90 day public consultation with a wide range of stakeholders. Should any negative impacts come to light these will be addressed and brought to Members' attention.

11. Actions

What actions are required in relation to obtaining further data/information, to reduce or remove negative impacts or improve positive impacts?

Action	Who will be responsible for seeing it is done?	When will it be done by?	How will we know we have achieved our objective?
90 day consultation	Sue Bradshaw	7.3.22	Analysis of consultation feedback.
Establish Project team	Sue Bradshaw	5.1.22	Team in place
Evaluation of Project	Sue Bradshaw	7.9 22	Evaluation reports

12. Sign off

	Name	Position	Signature	Date
Completed by	Sue Bradshaw	Principal Officer	S.H. Bradshaw	3.11.21
Signed off by	Angela Thomas	Head of Service/Director	A. Thomas	4.11.21



Cyngor Castell-nedd Port Talbot
Neath Port Talbot Council

Independent Living Hub



Consultation Paper

Building Safe and Resilient Communities

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1. Background

Bspoked Enterprises is a training and employment centre the purpose of which is to provide people who have low to moderate learning disabilities the opportunity to develop employment and training skills which they can use to move on to other training and employment opportunities.

However, Bspoked has evolved over the years for some people to become a long term day service despite the aim of Bspoked being to support people to transition to other opportunities.

The current building, which is located at Neath Abbey, will be adapted to include areas where people can be supported by staff to develop new and build on existing skills as well as skills which will enable them to progress to other training opportunities or employment.

The newly created areas will include two training flats each with a kitchen, bathroom, living room and bedroom (although these areas will not provide accommodation for people to live in but will be a training facility). Use of assistive technology will be facilitated by including up to date equipment within the training flats to enable people to try this equipment and devices and develop the skills to use this technology within their own environment.

2. What is Independent Living?

Independent Living empowers you to have greater choice and control in directing your own life, having the same range of choices as a non-disabled person to make informed decisions about any practical support you require to go about your everyday life. For some people, that can be:

- using the bus
- attending an activity in their community centre

- making lunch
- having someone to help you pay your bills
- doing the weekly shop
- connecting online with friends, using online bank or finding information

Independent living is not about people living alone or being without support that they need, but making sure that the barriers that stop you being able to choose what you would like to do are reduced and/or where possible removed.

The disabled community tells us that the 12 basic rights of disabled people are:

1. Appropriate and Accessible Information
2. An adequate income
3. Appropriate and accessible health and social care provisions
4. A fully-accessible transport system
5. Full access to the environment
6. Adequate provision of technical aids and equipment
7. Availability of accessible and adapted housing
8. Adequate provision of personal assistance
9. Availability of inclusive education and training
10. Equal opportunities for employment
11. Availability of independent advocacy and self- advocacy
12. Availability of peer counselling

3. What is the aim of the Independent Living Hub?

We want to develop Bspoked into an Independent Living Hub that works with you to hear what is important to *you* and your independence. We are proposing that we no longer focus *only* on work, training and employment and that we develop our service to include supporting you achieve your goals in all aspects of your life.

At the Independent Hub, we will aim to:

- deliver task focussed activities that enable people to develop the skills they require to live as independently as possible such as looking after the home, shopping and meal preparation and managing money etc.
- facilitate group and individual activities that support positive contributions to local communities e.g. volunteering, work and training
- support individuals to find travel solutions via the use of various methods of independent travel, including the use of public transport, cycling or walking.
- prepare people [who wish to move to their own accommodation] with necessary life skills to move on to more independent accommodation and to support them with this process.
- support people to utilise every day and advancing assistive technology to aid them live more independently
- (wherever possible) follow structured competency based training and educational opportunities that the service provides.
- ensure that each individual within the service has a specific outcome/s identified that they wish to achieve, in consultation with their network of support and to monitor their progress
- encourage naturally occurring relationships, support and resources, so that an individual's network within their community is maximised
- provide a 'drop in' service to the community to enable them to access support to manage activities of daily living.

4. What are the aims of this consultation?

The aims of the consultation are to:

- Make sure that all interested parties are aware of the Council's idea to develop Bspoked into an Independent Living Hub
- Make sure that people have all the information they need to come to an informed opinion
- Encourage people to give their views on the document (outlined in section 2)
- Make sure people know how to submit their views
- Collect feedback and consider this before a final decision is made

5. When will the consultation take place?

The Council will be collecting feedback for 90 days from 7th December 2021 and finish on 6th March 2022 (see Section 6 for how to give your views).

After the consultation ends, all of the feedback will be analysed and a report will be presented to the Council's Cabinet. That report will set out the proposals and recommendations taking into account the feedback from the consultation.

6. Questions & Answers

There are a number of ways that you can submit questions and comments about the Independent Living Hub during the consultation period (see Section 6). However, here are answers to some questions you may have:

Q: What is the reason for developing Bspoked into an Independent Living Hub?

A: We want to enhance what we already offer. We know that many people want to develop their independence, and we feel the introduction of two training flats will support people develop these skills. We would like to develop the existing workshops to be more focused on building your independent living skills; we know that supporting people to build their confidence and independent living skills can be achieved in many ways, and developing the existing workshops is another way to do that.

Q: What does the Council hope to get out of this consultation?

A: We want to know if you think the development of Bspoked into an independent living hub is a good idea, and if there's anything you think we've missed.

7. How will the Council collect views and opinions?

There are a number of ways that the Council will be collecting views and opinions on the draft strategy:

i. Consultation Portal

The "Have Your Say" section on Neath Port Talbot Council's website will allow you to view all supporting documents, make comments and provide feedback via the Internet.

ii. Meetings with partner agencies, groups and forums

We will be discussing the proposal at meetings with key partner agencies, service user groups, carer forums and other stakeholder forums.

25th January 2022 at 11.00am for families and carers

25th January 2022 at 14.00pm for service users

iii. In writing

You can write to us or complete the Feedback Form at the end of this booklet. Letters and forms can be put into the suggestion box or can be posted to:

Independent Living Hub Consultation
Neath Port Talbot Council
Social Services Commissioning Unit
Civic Centre
Neath
SA11 3QZ

Or email bspoked@npt.gov.uk

8. Explanation of terms used in the context of this document

Advocacy is a service that represents others or helps them to represent themselves. The advocate will put a person's views forward, make sure that they are kept fully informed and that they have all the information they need to make an informed decision or choice.

Independent Living enables disabled people to achieve their own goals and live their lives in the way they choose.

Partner agencies - these are organisations who work together to provide services, e.g. the Council, Local Health Board, Carers Service, etc.

A **Stakeholder** is a person, group or organisation with a direct interest, involvement, or investment in something, e.g. staff, owners and customers/ service users of a business or service.

Alternative Formats

This information is available in a range of formats including Welsh. All documents can also be accessed via the Council's website. To make a request for another format, please ask one of the Respite or Day Centre Staff who will pass your request on to the Commissioning Unit, or email us directly at: bspokedenterprises@npt.gov.uk

9. Feedback form

Neath Port Talbot Council

Independent Living Hub Consultation

Feedback Form

If you would like to comment on this proposal, please complete this form and post it in the questionnaire box or post it to:

Independent Living Hub Consultation
 Neath Port Talbot Council
 Social Services Commissioning Unit
 Civic Centre
 Neath
 SA11 3QZ

If you wish to receive a response to any questions raised on this form please supply your name and address:

Name:			
Address:			
		Postcode:	

Please indicate your interest in this strategy (please ✓):

I am a Service User	<input type="checkbox"/>	
I am related to a Service User	<input type="checkbox"/>	
I am a carer for a Service User	<input type="checkbox"/>	
I am a member of staff at a Service	<input type="checkbox"/>	

Other (please specify)	

Independent Living Hub

How much do you agree or disagree with the proposal to develop Bspoked into an Independent Living Hub? Please tick ✓ one box only:

Strongly agree	Tend to agree	Neither agree or disagree	Tend to disagree	Strongly disagree	Don't know
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Please give reasons for your answer or provide further comments in the box below:

Importance of approach

How much do you agree or disagree with the Independent Living approach? Please tick ✓ one box only:

Strongly agree	Tend to agree	Neither agree or disagree	Tend to disagree	Strongly disagree	Don't know
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Please give reasons for your answer or provide further comments or suggestions in the box below:

--

Independent Living Hub Impact

Do you think that the Independent Living Hub would have a positive or negative impact on you? Please tick ✓ one box only:

Positive	Negative	Don't know

Please give reasons for your answer or provide further comments or suggestions in the box below:

--

Gaps

Is there anything you feel we have missed that should be included in the Independent Living Hub?

Please provide further comments or suggestions in the box below:

--

Any other comments

Please provide further comments or suggestions in the box below:

About You

The Council operates equality policies that aim to ensure that everyone is treated fairly and equally. To make sure that people are not discriminated against when accessing our services we carry out monitoring and therefore would be grateful if you could answer the following questions. The information you provide is strictly confidential.

Age: (please ✓ one answer)

- | | | | |
|-----------------------------------|--------------------------------|--------------------------------|--|
| <input type="checkbox"/> Under 16 | <input type="checkbox"/> 30-39 | <input type="checkbox"/> 60-74 | <input type="checkbox"/> 86+ |
| <input type="checkbox"/> 16-24 | <input type="checkbox"/> 40-49 | <input type="checkbox"/> 75-85 | <input type="checkbox"/> Prefer not to say |
| <input type="checkbox"/> 25-29 | <input type="checkbox"/> 50-59 | | |

Welsh Language – are you: (please ✓ one answer)

- | | | |
|---|--|---|
| <input type="checkbox"/> Fluent speaker & writer | <input type="checkbox"/> Fluent speaker | <input type="checkbox"/> Learner |
| <input type="checkbox"/> Fairly fluent speaker & writer | <input type="checkbox"/> Fairly fluent speaker | <input type="checkbox"/> Little or no knowledge |

The Equality Act 2010 defines a person as disabled if they have a physical or mental impairment, which has a substantial and long term (i.e. has lasted or is expected to last at least 12 months) adverse effect on the person's ability to carry out normal day-to-day activities.

Do you consider yourself to have a disability? (please ✓ one answer)

- | | | |
|------------------------------|-----------------------------|--|
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> Prefer not to say |
|------------------------------|-----------------------------|--|

Ethnic origin: (please ✓ one answer)

- | | | |
|---|---|--|
| <input type="checkbox"/> White British | <input type="checkbox"/> Mixed: White & Asian | <input type="checkbox"/> Black: African |
| <input type="checkbox"/> White Irish | <input type="checkbox"/> Indian | <input type="checkbox"/> Black: Caribbean |
| <input type="checkbox"/> Mixed: White & Black Caribbean | <input type="checkbox"/> Bangladeshi | <input type="checkbox"/> Chinese |
| <input type="checkbox"/> Mixed: White & Black African | <input type="checkbox"/> Pakistani | <input type="checkbox"/> Prefer not to say |
| <input type="checkbox"/> Other (please specify): | <input type="text"/> | |

Sex (please ✓ one answer)

- | | | | |
|-------------------------------|---------------------------------|--------------------------------------|--|
| <input type="checkbox"/> Male | <input type="checkbox"/> Female | <input type="checkbox"/> Transgender | <input type="checkbox"/> Prefer not to |
|-------------------------------|---------------------------------|--------------------------------------|--|

say

Religion/Belief: *(please ✓ one answer)*

Christian Buddhist Hindu Jewish Muslim
 Sikh No religion Prefer not to say Any other religion

Any other religion *(please specify):*

Sexual Orientation *(please ✓ one answer)*

Heterosexual Lesbian Gay Bisexual Prefer not to say

Nationality *(please ✓ one answer)*

Welsh Scottish English British
 Irish Prefer not to say Other

Other *(please specify):* |

THANK YOU FOR YOUR TIME

END.

Mae'r dudalen hon yn fwriadol wag



**Easy Read Version
of
Neath Port Talbot Council's
Plan to create an Independent
Living Hub at B'spoked.**



What is an Independent Living Hub?



The Independent Living Hub will help people to learn skills so they can do as much as possible on their own or with less support from their carers or parents.



The plan is to create 2 new training flats where people can learn skills with help from the staff at Bspoked.



We will ask people who go to Bspoked to tell us what they think about the plan to create the Hub and what they think will help them to learn skills.



We will also ask staff who work at B'spoked what they think about the plan.



We would like to know what you think of the plan.

How to take part



There are different ways for you to tell us what you think.



You can attend one of our on-line events on 25th January 2022 at 14.00pm



You can Answer our online questionnaire
www.npt.gov.uk/haveyoursay

You can email us
bspokeenterprises@npt.gov.uk

Mae'r dudalen hon yn fwriadol wag



Cyngor Castell-nedd Port Talbot
Neath Port Talbot Council

NEATH PORT TALBOT COUNTY BOROUGH COUNCIL Social Care, Health & Well-being Cabinet Board

9th December 2021

**Report of the Head of Children and Young People Services –
K. Warren**

Matter for Decision

Wards Affected All Wards

**PROCUREMENT EXERCISE FOR THE PROVISION OF A
RESIDENTIAL SHORT BREAK SERVICE TO CHILDREN AND
YOUNG PEOPLE WITH DISABILITIES.**

Purpose of the Report

To obtain Member approval for the:

- Undertaking of a procurement exercise for the provision of a residential short break service to Children and Young People with disabilities (“the Service”).
- Head of Children and Young People Services to receive delegated authority to enter into a contract of up to 10 years for the delivery of the Service and the associated property lease with the winning bidder.

Executive Summary

Following a competitive procurement exercise, Neath Port Talbot Council (“the Council”) entered into a ten year contract with Action for

Children for the provision of residential short break services to Children and Young People with a disability.

The end date of the current contract is 31st July 2022, as such there is a need to re-procure this Service to ensure that appropriate arrangements are in place post July 2022.

Background

On the 15th July 2010, agreement was given for the re-provisioning of residential short breaks for Children and Young People with disabilities (Background Paper 1). This involved the development of a purpose built three bedroomed building within Neath Port Talbot and the procurement of a provider to deliver the required residential short breaks.

Subsequently, Action for Children were awarded a ten year contract to deliver the Service, which will expire on 31st July 2022. The Council own the purpose built property in which the Service is delivered and a lease was entered into with Action for Children for the term of the Service contract.

Commonly known as 'respite', the Service offers disabled children and young people with fun, enjoyable experiences away from home, whilst supporting them to learn and develop new skills to help them fulfil their potential. In addition, the Service also provides parent carers with regular opportunities to take breaks from their caring responsibilities.

In light of the upcoming end date for the current contract and lease, Officers have undertaken a review of the Service to inform the new contract. This review included engagement and consultation with key stakeholders, such as those that use the Service and their families.

In order to ensure the continuity of this essential Service by a suitably experienced and skilled provider, there is a need for the Council to undertake a procurement exercise to re-tender the Service. Providers wishing to be considered for this opportunity will be evaluated based

on their quality and cost, in order to identify which bidder will offer the most economically advantageous tender. The bidder offering the most economical advantageous tender will be awarded the contract to deliver the Service for a period of up to ten years.

The successful bidder will be required to enter into a new lease arrangement in order to enable the continued delivery of the Service from the current location for the term of the Service contract.

Financial Impacts

The current cost to the Council for the provision of the Service is £388,510.00 per annum.

It is not possible to indicate the financial impact of this proposal until the Service has been tendered and the Council has evaluated the bids. The procurement process will ensure that the Council contracts with a provider that is able to offer best value for money, taking into account both the quality and cost of the bidder's submissions.

Any additional costs will be sourced from the Children and Young Peoples base budget.

Integrated Impact Assessment

A first stage impact assessment has been undertaken to assist the Council in discharging its legislative duties (under the Equality Act 2010, the Welsh Language Standards (No.1) Regulations 2015, the Well-being of Future Generations (Wales) Act 2015 and the Environment (Wales) Act 2016). The first stage impact assessment has indicated that a more in-depth assessment was required.

An overview of the Integrated Impact Assessment has been included below in summary form only and it is essential that Members read the Integrated Impact Assessment, which is attached to the report at Appendix 1, for the purposes of the meeting.

Equalities - Children and Young People that use the Service have a

protected characteristic by virtue of their age and disability. This proposal will have a positive impact as it ensures the continuation of Services that will help children and young people develop skills that build upon their independence. The re-procurement of this Service will not make changes to the eligibility criteria or the Service provision.

Families of Children and Young people that use the Service have a protected characteristic by virtue of their age and/or marriage/civil partnership. This proposal will have a positive impact as it ensures the continuation of services that supports families to have respite from their caring role.

The proposal will have a neutral impact on those affected by this proposal that have other protected characteristics. This is because access to the Service is not based on other protected characteristics and this re-procurement does not make changes to the eligibility criteria. The service will be required to comply with relevant equalities legislation and regulations.

The Service is person-centred, so that any individualised needs of those that stay in the respite home and family members of those that attend the home will be met. This includes being responsive to any requirements that a person has by virtue of their protected characteristic(s). In addition the re-procurement of this Service is not to replace other respite options for disabled children and young people.

Socio-Economic Disadvantage - Will have a positive impact as the aim of the Service is to offer disabled Children and Young People with fun, enjoyable experiences away from home, which will support them to learn and develop new skills to help them fulfil their potential. In addition, the Service also provides parent carers with regular opportunities to take breaks from their caring responsibilities.

There is no charge for attending the Service, as such this Service is equitably available regardless of a person's socio-economic status.

The procurement of this Service will have a positive impact on both groups of people as it will enable the continuation of essential Services once the current contract ends. The Service supports families to have respite from their caring role and helps children and young people to develop skills that build upon their independence.

Community Cohesion/ Social Exclusion/Poverty - Will have a positive impact as the aim of the Service is to offer disabled Children and Young People with fun, enjoyable experiences away from home, which will support them to learn and develop new skills to help them fulfil their potential. In addition, the Service also provides parent carers with regular opportunities to take breaks from their caring responsibilities.

There is no charge for attending the Service so attending the Service will have no impact on a person income.

The procurement of this Service will have a positive impact on both groups of people, as it will enable the continuation of essential Services once the current contract ends. The Service supports families to have respite from their caring role and helps children and young people to develop skills that build upon their independence.

Welsh Language - Will have a neutral impact as the re-procurement will ensure that people are able to continue accessing the Service in their language of choice.

Biodiversity – Not applicable to this proposal.

Well-being of Future Generations - Will have a positive impact on meeting the five ways of working under the Well-being of Future Generation Act, as the undertaking of a procurement process will ensure the contention of Services that improve the well-being of adults, children and young people who live in the county borough.

Valleys Communities Impacts

The Service is located in a central Port Talbot location and is

available to all Children and Young People that have an assessed need for the Service. The Service is one of a range of different respite opportunities and considerations relating to valley communities will form part of the person centred and outcome focused assessment process.

Workforce Impacts

There are no workforce impacts on Council employees.

The Transfer of Undertakings (Protection of Employment) Regulations 2006 (“TUPE”) may apply to this contract between the current provider of the Service and the winning bidder. Any TUPE will be between the current and new provider and will not impact on the Council workforce.

Legal Impacts

The value of the contract is estimated to be in the region of £388,510.00 per annum, therefore with a contract a term of up to ten years, the contract value will exceed the threshold of £663,540 for the Light Touch Regime set out in the Public Contract Regulations 2015. In addition the Council must comply with its own Contract Procedure Rules which apply to the letting of contracts. Under the Public Contract Regulations 2015, the Council is obliged to act in an open fair and transparent manner, ensuring that contract opportunities for such social care services are advertised to reach a wide market in order to encourage competition and to ensure equal treatment of all bidders. As such, the Council is required to undertake a competitive procurement exercise for the Service in accordance with the Light Touch Regime under Public Contract Regulations 2015 and its Contract Procedure Rules. The tender process to be undertaken will comply with relevant legislative and procedural requirements.

Risk Management Impacts

The winning bidder will be required to submit a contract mobilisation plan to ensure a smooth transfer of the Service. The implementation of this mobilisation plan will be monitored by Officers within the Common Commissioning Unit.

Consultation

There is no requirement for external consultation on this item.

The Social Services and Wellbeing (Wales) Act 2014 places importance on Commissioners to promote co-production of service design with those that use services.

Commissioners have engaged with Children and Young People who use the current Service, their families and various professionals who are key stakeholders to this Service. Engagement activities included parent coffee mornings, feedback activities with Children and Young People, questionnaires and meeting based discussions.

The engagement feedback identified that Children, Young People and parent carers who use this Service consider it to be very effective in supporting Children and Young People to develop a range of skills and in supporting achievement of their personal outcomes. Many families described the Service as a 'lifeline' that supports them in their parent carer roles.

The engagement feedback has been used to inform the Service design and Service specification from July 2022. A short breaks outcomes framework has also been developed as a result of the engagement activities, which will be used as a tool to regularly evaluate the delivery of the Service based upon what Children, Young People and their families feel are important to them.

As part of the procurement evaluation, Commissioners will make arrangements to enable representation from those that use the Service.

Recommendations

Having had due regard to the integrated impact assessment it is recommended that agreement is given for:

- a) The undertaking of a procurement exercise to commission a residential short break Service to Children and Young People with a disability.
- b) Following the procurement process, for the Head Children and Young People Services to be granted delegated authority to enter into a contract with the bidder evaluated as offering the most economically advantageous tender (taking into account the quality and cost of the bids), for the provision of a residential short break service to Children and Young People with a disability.
- c) The Head of Children and Young People Services to be granted delegated authority to enter into a lease agreement with the winning bidder.

Reasons for Proposed Decision

To ensure that sufficient arrangements are in place to continue the delivery of a residential short break Service to Children and Young People with a disability post July 2022.

Implementation of Decision

The decision is proposed for implementation after the three day call in period

Appendices

Appendix 1: Integrated Impact Assessment

List of Background Papers

Re-provisioning of Residential Short Term Break Facilities for Disabled Children and Young People (15th July 2010):
[http://moderngov.npt.gov.uk/Data/Children,%20Young%20People%20and%20Education%20Cabinet%20Board/20100715/Agenda/\\$CYPEB-150710-REP-SS-JR.doc.pdf](http://moderngov.npt.gov.uk/Data/Children,%20Young%20People%20and%20Education%20Cabinet%20Board/20100715/Agenda/$CYPEB-150710-REP-SS-JR.doc.pdf)

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Mae'r dudalen hon yn fwriadol wag

Integrated Impact Assessment (IIA)

This Integrated Impact Assessment considers the duties and requirements of the following legislation in order to inform and ensure effective decision making and compliance:

- Equality Act 2010
- Welsh Language Standards (No.1) Regulations 2015
- Well-being of Future Generations (Wales) Act 2015
- Environment (Wales) Act 2016

Version Control

Version	Author	Job title	Date
Version 1	Chelé Zandra Howard	PO Commissioning	28/10/21

1. Details of the initiative

	Title of the Initiative: Procurement Exercise for the Provision of a Residential Short Break Services to Children and Young People with Disabilities.
1a	Service Area: Children and Young People
1b	Directorate: Social Services, Health and Housing
1c	Summary of the initiative: The procurement of a residential short break Service to Children and Young People with disabilities.
1d	Is this a 'strategic decision'? No
1e	Who will be directly affected by this initiative? <ul style="list-style-type: none">• Children and young people requiring assessed as requiring a Service• Families of children and young people assessed as requiring a Service

1f	<p>When and how were people consulted?</p> <p>The following engagement exercises were carried out in June/ July 2020 and October/ November 2021:</p> <ul style="list-style-type: none"> • Activity based engagement with children who use the service • Online and postal questionnaires to parent carers • Coffee morning with parent carers • Telephone conversations with parent carers • Meeting based discussions with Child Disability Social Work team and management • Online questionnaires with incumbent provider staff • Meeting based discussions with incumbent provider management • Online questionnaires with stakeholder organisations • Meeting based discussions with key stakeholder organisations
1g	<p>What were the outcomes of the consultation?</p> <ul style="list-style-type: none"> • Informed service model design (including core service requirements and optional extra service components) • Informed service specification (which details the service requirements) • Led to the creation of a short breaks outcomes framework which will be used to regularly evaluate service delivery based on what is important to children and their families • Provided a platform to encourage families to become more involved in co-producing services with the Council which will be further developed and embedded in the long term

2. Evidence

What evidence was used in assessing the initiative?

- Service specific data relating to the children and families using the current overnight short breaks service
- Service specific data relating to the staff who work in the current overnight short breaks service
- Client information on the Social Services database (relating to the children and their families who use the current overnight short breaks service)
- Information from the engagement and consultation activities
- Overnight short breaks service reports from the Incumbent Provider
- Information from the engagement and consultation

- Summary Statistics for South West Wales Region <https://gov.wales/sites/default/files/statistics-and-research/2020-05/summary-statistics-south-west-wales-region-2020-958.pdf>
- Daffodil data on older people <http://www.daffodilcymru.org.uk/>
- Stats Wales <https://statswales.gov.wales/Catalogue/Population-and-Migration/Population/Estimates/Local-Authority/populationestimates-by-localauthority-year> and <https://statswales.wales.gov.uk/Catalogue/Equality-and-Diversity/Sexual-Identity/SexualIdentity-by-Area-IdentityStatus>
- Western Bay Population Needs Assessment <http://www.westernbaypopulationassessment.org/en/home/#about>
- ONS data from 2011 <https://www.ons.gov.uk/census>
- Client information on the Social Services database

3. Equalities

a) How does the initiative impact on people who share a **protected characteristic**?

Protected Characteristic	+	-	+/-	Why will it have this impact?
Age	x			<p>The service is for children and young people with a disability that are assessed as benefiting from a residential respite service. As such those that attend will have a protected characteristic due to their age.</p> <p>The service also supports families of children, families will be across a range of ages.</p> <p>The service is person-centred so that any individualised needs of those that stay in the respite home and family members of those that attend the home will be met. This includes being responsive to any requirements that a person has by virtue of their protected characteristic(s). In addition the re-procurement of this service is not to replace other respite options for disabled children and young people.</p> <p>The tender process will ensure that a suitably experienced provider delivers the service (i.e. experienced is delivering services to children and young people with disabilities).</p>

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			<p>The provider will be contractually required to deliver a Service in accordance with relevant equalities legislation such as the Equalities Act 2010.</p> <p>All commissioned services have a complaints process and NPT CBCs contract monitoring team review complaints received by commissioned services, as well as their responses, as part of the monitoring process. The contract monitoring process also includes staff and service user feedback. This will allow the Council to pick up and address any issues relating to a person's experience. The provider will also be required to implement their own monitoring systems, which will also help to identify if any aspect of the service has led to unintended/unidentified negative impacts</p> <p>Regulation 25 of The Regulated Services (Service Providers and Responsible Individuals) (Wales) Regulations 2017 requires regulated service providers (which applies to this overnight short breaks service) to have regards to an individual's protected characteristics under the Equalities Act 2010. Compliance with these Regulations are monitored by Care Inspectorate Wales.</p> <p>The provider will be contractually required to deliver a Service in accordance with relevant equalities legislation such as the Equalities Act 2010</p> <p>All staff delivering the service will receive equality and diversity training.</p> <p>The procurement of this service will have a positive impact on both the children who use this service as well as their families as it will enable the continuation of an essential service which supports parent carers to have overnight short breaks from their caring role and helps children to develop skills that build upon their independence.</p>
Disability	x		<p>The service is for children and young people with a disability that are assessed as benefiting from a residential respite Service. As such those that attend will have a protected characteristic due to their disability.</p>

			<p>The disability status of families is unknown however respite supports carers to achieve their own wellbeing outcomes by offering them a break from their caring responsibilities.</p> <p>The Service is person-centred so that any individualised needs of those that stay in the respite home and family members of those that attend the home will be met. This includes being responsive to any requirements that a person has by virtue of their protected characteristic(s). In addition the re-procurement of this service is not to replace other respite options for disabled children and young people.</p> <p>The tender process will ensure that a suitably experienced provider delivers the service (i.e. experienced is delivering services to children and young people with disabilities)</p> <p>All commissioned services have a complaints process and NPT CBCs contract monitoring team review complaints received by commissioned services, as well as their responses, as part of the monitoring process. The contract monitoring process also includes staff and service user feedback. This will allow the Council to pick up and address any issues relating to a person's experience. The provider will also be required to implement their own monitoring systems, which will also help to identify if any aspect of the service has led to unintended/unidentified negative impacts</p> <p>Regulation 25 of The Regulated Services (Service Providers and Responsible Individuals) (Wales) Regulations 2017 requires regulated service providers (which applies to this overnight short breaks service) to have regards to an individual's protected characteristics under the Equalities Act 2010. Compliance with these Regulations are monitored by Care Inspectorate Wales.</p> <p>The provider will be contractually required to deliver a service in accordance with relevant equalities legislation such as the Equalities Act 2010</p> <p>All staff delivering the service will receive equality and diversity training.</p>
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Gender reassignment		x	<p>There is no available data however eligibility for the service will not change as a result of this tender.</p> <p>The service is person-centred so that any individualised needs of those that stay in the respite home and family members of those that attend the home will be met. This includes being responsive to any requirements that a person has by virtue of their protected characteristic(s). In addition the re-procurement of this service is not to replace other respite options for disabled children and young people.</p> <p>All commissioned services have a complaints process and NPT CBCs contract monitoring team review complaints received by commissioned services, as well as their responses, as part of the monitoring process. The contract monitoring process also includes staff and service user feedback. This will allow the Council to pick up and address any issues relating to a person's experience. The provider will also be required to implement their own monitoring systems, which will also help to identify if any aspect of the service has led to unintended/unidentified negative impacts</p> <p>Regulation 25 of The Regulated Services (Service Providers and Responsible Individuals) (Wales) Regulations 2017 requires regulated service providers (which applies to this overnight short breaks service) to have regards to an individual's protected characteristics under the Equalities Act 2010. Compliance with these Regulations are monitored by Care Inspectorate Wales.</p> <p>The provider will be contractually required to deliver a service in accordance with relevant equalities legislation such as the Equalities Act 2010</p>

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Marriage & civil partnership	x		<p>The age range for eligibility to attend means that marriage and civil partnership would not apply to those staying at the Care Home.</p> <p>Family members of the children and young people may be married/in a civil partnership. Respite supports carers to achieve their own wellbeing outcomes by offering them a break from their caring responsibilities.</p> <p>The service is person-centred so that any individualised needs of those that stay in the respite home and family members of those that attend the home will be met. This includes being responsive to any requirements that a person has by virtue of their protected characteristic. In addition the re-procurement of this service is not to replace other respite options for disabled children and young people.</p> <p>All commissioned services have a complaints process and NPT CBCs contract monitoring team review complaints received by commissioned services, as well as their responses, as part of the monitoring process. The contract monitoring process also includes staff and service user feedback. This will allow the Council to pick up and address any issues relating to a person's experience. The provider will also be required to implement their own monitoring systems, which will also help to identify if any aspect of the service has led to unintended/unidentified negative impacts</p> <p>Regulation 25 of The Regulated Services (Service Providers and Responsible Individuals) (Wales) Regulations 2017 requires regulated service providers (which</p>

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Pregnancy and maternity		x	<p>Data on this characteristic is unknown however eligibility for the service will not change as a result of this tender.</p> <p>The service is person-centred so that any individualised needs of those that stay in the respite home and family members of those that attend the home will be met. This includes being responsive to any requirements that a person has by virtue of their protected characteristic(s). In addition the re-procurement of this service is not to replace other respite options for disabled children and young people.</p> <p>All commissioned services have a complaints process and NPT CBCs contract monitoring team review complaints received by commissioned services, as well as their responses, as part of the monitoring process. The contract monitoring process also includes staff and service user feedback. This will allow the Council to pick up and address any issues relating to a person's experience. The provider will also be required to implement their own monitoring systems, which will also help to identify if any aspect of the service has led to unintended/unidentified negative impacts</p>

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Race		x	<p>Data on this characteristic is unknown however eligibility for the service will not change as a result of this tender.</p> <p>The service is person-centred so that any individualised needs of those that stay in the respite home and family members of those that attend the home will be met. This includes being responsive to any requirements that a person has by virtue of their protected characteristic(s). In addition the re-procurement of this service is not to replace other respite options for disabled children and young people.</p> <p>All commissioned services have a complaints process and NPT CBCs contract monitoring team review complaints received by commissioned services, as well as their responses, as part of the monitoring process. The contract monitoring process also includes staff and service user feedback. This will allow the Council to pick up and address any issues relating to a person's experience. The provider will also be</p>

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<p>Religion or belief</p>		<p>x</p>	<p>Data on this characteristic is unknown however eligibility for the service will not change as a result of this tender.</p> <p>The service is person-centred so that any individualised needs of those that stay in the respite home and family members of those that attend the home will be met. This includes being responsive to any requirements that a person has by virtue of their protected characteristic(s). In addition the re-procurement of this service is not to replace other respite options for disabled children and young people.</p> <p>All commissioned services have a complaints process and NPT CBCs contract monitoring team review complaints received by commissioned services, as well as</p>

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Sex		x	<p>Data does not indicate that this proposal will impact on people due to their sex.</p> <p>The service is person-centred so that any individualised needs of those that stay in the respite home and family members of those that attend the home will be met. This includes being responsive to any requirements that a person has by virtue of their protected characteristic(s). In addition the re-procurement of this service is not to replace other respite options for disabled children and young people.</p>

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Sexual orientation		x	<p>Data on this characteristic is unknown however eligibility for the service will not change as a result of this tender.</p> <p>The service is person-centred so that any individualised needs of those that stay in the respite home and family members of those that attend the home will be met. This includes being responsive to any requirements that a person has by virtue of their</p>

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What action will be taken to improve positive or mitigate negative impacts?

- The Service Provider will produce monthly performance reports which will include details of complaints/ issues which will be analysed by the Commissioning team.
- A monthly panel (consisting of a Commissioning Officer, Child Disability Team Manager and the Service Provider Manager) will meet to discuss referrals, service performance, outcome progression, complaints and service related issues.
- Commissioning team to monitor the service through the annual contract monitoring process to ensure compliance with relevant legislation and guidance.
- Commissioning team to monitor safeguarding referrals and complaints regarding the service.

b) How will the initiative assist or inhibit the ability to meet the **Public Sector Equality Duty**?

Public Sector Equality Duty (PSED)	+	-	+/-	Why will it have this impact?
To eliminate discrimination, harassment and victimisation	x			<p>The aim of the service is to offer disabled Children and Young People with fun, enjoyable experiences away from home, which will support them to learn and develop new skills to help them fulfil their potential. In addition, the service also provides parent carers with regular opportunities to take breaks from their caring responsibilities.</p> <p>The procurement of this service will have a positive impact on both the children who use this service as well as their families as it will enable the continuation of an essential service which supports parent carers to have overnight short breaks from their caring role and helps children to develop skills that build upon their independence.</p>
To advance equality of opportunity between different groups	x			

To foster good relations between different groups	x			
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What action will be taken to improve positive or mitigate negative impacts?

- The Service Provider will produce monthly performance reports which will include details of complaints/ issues which will be analysed by the Commissioning team.
- A monthly panel (consisting of a Commissioning Officer, Child Disability Team Manager and the Service Provider Manager) will meet to discuss referrals, service performance, outcome progression, complaints and service related issues.
- Commissioning team to monitor the service through the annual contract monitoring process.
- Commissioning team to monitor safeguarding referrals and complaints regarding the service.

4. Socio Economic Duty

Impact	Details of the impact/advantage/disadvantage
Positive/Advantage	<p>The aim of the service is to offer disabled children and young people with fun, enjoyable experiences away from home, which will support them to learn and develop new skills to help them fulfil their potential. In addition, the service also provides parent carers with regular opportunities to take breaks from their caring responsibilities.</p> <p>There is no charge for attending the service, as such this service is equitably available regardless of a person's socio-economic status.</p> <p>The procurement of this service will have a positive impact on both the children who use this service as well as their families as it will enable the continuation of an essential service which supports parent carers to have overnight short breaks from their caring role and helps children to develop skills that build upon their independence.</p>
Negative/Disadvantage	None identified

Neutral	None identified
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What action will be taken to reduce inequality of outcome

- The Service Provider will produce monthly performance reports which will include details of complaints/ issues which will be analysed by the Commissioning team.
- A monthly panel (consisting of a Commissioning Officer, Child Disability Team Manager and the Service Provider Manager) will meet to discuss referrals, service performance, outcome progression, complaints and service related issues.
- Commissioning team to monitor the service through the annual contract monitoring process.
- Commissioning team to monitor safeguarding referrals and complaints regarding the service.

5. Community Cohesion/Social Exclusion/Poverty

	+	-	+/-	Why will it have this impact?
Community Cohesion	x			<p>The procurement of this service will have a positive impact on both the children who use this service as well as their families as it will enable the continuation of an essential service which supports parent carers to have overnight short breaks from their caring role and helps children to develop skills that build upon their independence.</p> <p>The aim of the service is to offer disabled children and young people with fun, enjoyable experiences away from home, which will support them to learn and develop new skills to help them fulfil their potential, as well as developing friendship groups. In addition, the service also provides parent carers with regular opportunities to take breaks from their caring responsibilities, which will help them to remain active members of their community and maintain relationships.</p>

				There is no charge for attending the service so attending will have no impact on a person income. In addition, regular respite can help support parent carers to gain or retain employment.
Social Exclusion	x			
Poverty	x			

What action will be taken to improve positive or mitigate negative impacts?

- The Service Provider will produce monthly performance reports which will include details of complaints/ issues which will be analysed by the Commissioning team.
- A monthly panel (consisting of a Commissioning Officer, Child Disability Team Manager and the Service Provider Manager) will meet to discuss referrals, service performance, outcome progression, complaints and service related issues.
- Commissioning team to monitor the service through the annual contract monitoring process.
- Commissioning team to monitor safeguarding referrals and complaints regarding the service.

6. Welsh

	+	-	+/-	Why will it have this effect?
What effect does the initiative have on: – people's opportunities to use the Welsh language			x	The re-procurement will ensure that people will be able to continue accessing the Service in their language of choice
– treating the Welsh and English languages equally			x	The re-procurement will ensure that people will be able to continue accessing the Service in their language of choice

What action will be taken to improve positive or mitigate negative impacts?

- The Service Provider will produce monthly performance reports which will include details of complaints/ issues which will be analysed by the Commissioning team.
- A monthly panel (consisting of a Commissioning Officer, Child Disability Team Manager and the Service Provider Manager) will meet to discuss referrals, service performance, outcome progression, complaints and service related issues.
- Commissioning team to monitor the service through the annual contract monitoring process.
- Commissioning team to monitor safeguarding referrals and complaints regarding the service.

7. Biodiversity

How will the initiative assist or inhibit the ability to meet the **Biodiversity Duty**?

Biodiversity Duty	+	-	+/-	Why will it have this impact?
To maintain and enhance biodiversity			x	Not Applicable
To promote the resilience of ecosystems, i.e. supporting protection of the wider environment, such as air quality, flood alleviation, etc.			x	Not Applicable

What action will be taken to improve positive or mitigate negative impacts?

Not applicable

8. Well-being of Future Generations

How have the five ways of working been applied in the development of the initiative?

Ways of Working	Details
i. Long term – looking at least 10 years (and up to 25 years) ahead	<p>The aim of the service is to offer disabled children and young people with fun, enjoyable experiences away from home, which will support them to learn and develop new skills to help them fulfil their potential. In addition, the service also provides parent carers with regular opportunities to take breaks from their caring responsibilities. As such this will have a positive impact on people’s long term wellbeing.</p>
ii. Prevention – preventing problems occurring or getting worse	<p>The aim of the service is to offer disabled children and young people with fun, enjoyable experiences away from home, which will support them to learn and develop new skills to help them fulfil their potential. In addition, the service also provides parent carers with regular opportunities to take breaks from their caring responsibilities.</p> <p>As such a procurement process to ensure the continuation of the service will support families to have regular short breaks from their caring role which aims to support them to continue in their parent carer role in the long term.</p> <p>The continuation of the service will also help children and young people develop skills that build upon their independence and preventing the need to access more services in the long term.</p>

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iii. Collaboration – working with other services internal or external	This will involve working with a specialist organisation to deliver services that support the Council in meeting the needs of children and young people with disabilities, as well as their families.
iv. Involvement – involving people, ensuring they reflect the diversity of the population	Those that use services and their families have been involved in the service review and will be involved in the evaluation process.
v. Integration – making connections to maximise contribution to:	This services supports integration by affording children and young people with opportunities to learn and develop new skills and friendship groups away from their home. It also enables parent carers to have a break from their caring role, which supports integration with their wider communities.
Council's well-being objectives	Undertaking a procurement process to ensure the continuation of the service will improve the well-being of adults, children and young people who live in the county borough by ensuring the continuation of a service which will support families to access overnight short breaks from their caring role and to help children and young people develop skills that build upon their independence.
Other public bodies objectives	

9. Monitoring Arrangements

Provide information on the monitoring arrangements to:

Monitor the impact of the initiative on Equalities, Community Cohesion, the Welsh Measure, Biodiversity Duty and the Wellbeing Objectives.

- The Service Provider will produce monthly performance reports which will include details of complaints/ issues which will be analysed by the Commissioning team.
- A monthly panel (consisting of a Commissioning Officer, Child Disability Team Manager and the Service Provider Manager) will meet to discuss referrals, service performance, outcome progression, complaints and service related issues.
- Commissioning team to monitor the service through the annual contract monitoring process.
- Commissioning team to monitor safeguarding referrals and complaints regarding the service.

10. Assessment Conclusions

Please provide details of the conclusions reached in relation to each element of the assessment:

	Conclusion
Equalities	<p><u>Service Users</u> – will have a positive impact on those with a protected characteristic of age and disability as it ensures the continuation of services that will help children and young people develop skills that build upon their independence. The re-procurement of this service will not make changes to the eligibility criteria.</p> <p><u>Families of Service Users</u> – will have a positive impact on those with a protected characteristic of age and marriage/civil partnership as it ensures the continuation of a service that supports families to access overnight short breaks from their caring role.</p> <p><u>Both Groups</u> – will have a neutral impact on people with other protected characteristics as eligibility for the service is based on an assessment of need of children and young people with a disability. Access to the Service is not based on other protected characteristics and this re-procurement does not make changes to the eligibility criteria.</p> <p>The service is person-centred so that any individualised needs of those that use the service and their parent carers will be met. This includes being responsive to any requirements that a person has by virtue of their protected characteristic(s). In addition the re-procurement of this service is not to replace other short break service options available for disabled children and young people.</p> <p>Regulation 25 of The Regulated Services (Service Providers and Responsible Individuals) (Wales) Regulations 2017 requires regulated service providers (which applies to this overnight short breaks service) to have regards to an individual’s protected characteristics under the Equalities Act 2010. Compliance with these Regulations are monitored by Care Inspectorate Wales.</p> <p>The provider will be contractually required to deliver a service in accordance with relevant equalities legislation such as the Equalities Act 2010</p>

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	<p>All commissioned services have a complaints process and NPT CBCs contract monitoring team review complaints received by commissioned services, as well as their responses, as part of the monitoring process. The contract monitoring process also includes staff and service user feedback. This will allow the Council to pick up and address any issues relating to a person's experience.</p>
<p>Socio Economic Disadvantage</p>	<p><u>Both Groups</u> - Will have a positive impact as the aim of the service is to offer disabled children and young people with fun, enjoyable experiences away from home, which will support them to learn and develop new skills to help them fulfil their potential. In addition, the service also provides parent carers with regular opportunities to take breaks from their caring responsibilities.</p> <p>There is no charge for attending the Service, as such this Service is equitably available regardless of a person's socio-economic status.</p> <p>The procurement of this service will have a positive impact on both groups of people as it will enable the continuation of essential services once the current contract ends that supports families to have respite from their caring role and helps children and young people to develop skills that build upon their independence.</p>
<p>Community Cohesion/ Social Exclusion/Poverty</p>	<p><u>Both Groups</u> – Will have a positive impact as the aim of the service is to offer disabled children and young people with fun, enjoyable experiences away from home, which will support them to learn and develop new skills to help them fulfil their potential. In addition, the service also provides parent carers with regular opportunities to take breaks from their caring responsibilities.</p> <p>There is no charge for attending the Service so attending will have no impact on a person income.</p> <p>The procurement of this service will have a positive impact on both groups of people as it will enable the continuation of essential services once the current contract ends that supports families to have respite from their caring role and helps children and young people to develop skills that build upon their independence.</p>

Welsh	<u>Both Groups</u> – will have a neutral impact as the re-procurement will ensure that people will be able to continue accessing the service in their language of choice
Biodiversity	Not applicable to this proposal
Well-being of Future Generations	<u>Both Groups</u> - will have a positive impact on meeting the five ways of working under the Well-being of Future Generation Act as the undertaking of a procurement process will ensure the contention of services that improve the well-being of adults, children and young people who live in the county borough.

Overall Conclusion

Please indicate the conclusion reached:

- **Continue** - as planned as no problems and all opportunities have been maximised x
- **Make adjustments** - as potential problems/missed opportunities/negative impacts have been identified along with mitigating actions
- **Justification** - for continuing with the initiative even though there is a potential for negative impacts or missed opportunities
- **STOP** - redraft the initiative as actual or potential unlawful discrimination has been identified

Please provide details of the overall conclusion reached in relation to the initiative

The procurement of this service will have a positive impact as it will enable the continuation of essential services once the current contract ends that supports families to have respite from their caring role and helps children and young people to develop skills that build upon their independence.

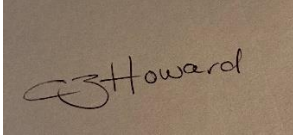
11. Actions

What actions are required in relation to obtaining further data/information, to reduce or remove negative impacts or improve positive impacts?

Action	Who will be responsible for seeing it is done?	When will it be done by?	How will we know we have achieved our objective?
Commissioning team to monitor the service through the yearly contract monitoring process	PO Commissioning	Within first 3 months of new contract and then annually, or as required.	Annual contract monitoring reports
Commissioning team to monitor safeguarding referrals and complaints regarding the service	PO Commissioning	As referrals are made to safeguarding	Additional monitoring visits to identify if changes have been implemented and sustained
Provider to produce monthly performance reports which will include details of complaints/ issues	The Provider	Monthly	Monthly reports
Monthly panel (consisting of a Commissioning Officer, Child Disability Team Manager and the Service Provider Manager) to discuss referrals, service performance, outcome progression, complaints and service related issues.	Child Disability Team Manager	Monthly	Monthly meetings
Children and Young People and their families that will receive a service to inform service specification	PO Commissioning	In line with procurement timeline	Contract will be shaped by feedback from those using the service
Children and Young People and their families that will receive a service to be invited	PO Commissioning	In line with procurement timeline	People will have had the opportunity to take part in the evaluation

to play a part in the tender evaluation			
The contract will have clauses relating to ensuring compliance with the relevant equalities legislation.	PO Commissioning	In line with procurement timeline	Contract includes required clauses
Procurement process to include questions regarding equalities legislation	PO Commissioning	In line with procurement timeline	Procurement questions to include relevant questions
The contract will obligate the provider to deliver the service in the residents chosen first language	PO Commissioning	In line with procurement timeline	Contract includes required clauses

12. Sign off

	Name	Position	Signature	Date
Completed by	Chelé Zandra Howard	PO Commissioning		29.10.21
Signed off by	Kerri Warren	Head of Service	K.Warren	29.10.21

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Mae'r dudalen hon yn fwiadol wag



Cyngor Castell-nedd Port Talbot
Neath Port Talbot Council

NEATH PORT TALBOT COUNTY BOROUGH COUNCIL Social Care, Health & Well-being Cabinet Board

9th December 2021

Report of the Head of Adult Services – A. Thomas

Matter for Decision

Wards Affected Dyffryn

COMMISSIONING OF CARE AND SUPPORT SERVICES IN A CORE AND CLUSTER SCHEME

Purpose of the Report

To obtain Member approval to undertake a procurement exercise for the provision of care and support within a Core and Cluster Scheme and for the Head of Adult Services to receive delegated authority to enter into a contract with the winning bidder.

Executive Summary

This report sets out a proposal to undertake a procurement exercise in order to appoint an experienced provider to deliver care and support services to a number of people with mental health and/or learning disability needs in a Core and Cluster Scheme.

Background

Neath Port Talbot Council (“the Council”) have identified that there are a number of people with a learning disability or mental ill health who are assessed as being eligible for statutory support and would benefit from the development of specially adapted accommodation due to their physical disability needs.

First Choice Housing Association (FCHA) are looking to develop a range of specialist accommodation in order to provide a wider range of housing options for people with a physical disability that have a learning disability and/or mental ill health.

The proposal is for the development of a bungalow that will provide shared living for two people, this would offer 24 hour support by on-site staff to people that have an assessed need for that level of support. A second development containing four self-contained flats would be created in close proximity, the people in these flats would receive targeted specialist domiciliary care, as well as having access to 'on-call' emergency support from the staff located in the bungalow. Further developments could be proposed as part of the Core and Cluster Scheme at a later date if there is an identified need.

If any necessary planning applications by FCHA for the development is agreed and the construction is taken forward, there would be a need for Officers to commission a suitably experienced provider to deliver the care and support to those that would move into the accommodation. As such, it is proposed that if the developments go ahead, Officers undertake a procurement exercise to commission a provider to deliver the required care and support to those housed in the Core and Cluster Scheme.

Providers wishing to be considered for this opportunity will be evaluated based on their quality and cost, in order to identify which bidder will offer the most economically advantageous tender. The bidder offering the most economical advantageous tender will be awarded the contract to deliver the care and support within the Core and Cluster Scheme for a period of up to ten years.

Financial Impacts

The budget for Mental Health and Learning Disabilities in the 2021-2022 financial year is £23,471,090.

It is not possible to indicate the financial impact of this proposal until the services have been tendered and the Council has evaluated the

bids. The procurement process will ensure that the Council contracts with a provider that is able to offer best value for money, taking into account both the quality and cost of the bidder's submissions.

Integrated Impact Assessment

A first stage impact assessment has been undertaken to assist the Council in discharging its legislative duties (under the Equality Act 2010, the Welsh Language Standards (No.1) Regulations 2015, the Well-being of Future Generations (Wales) Act 2015 and the Environment (Wales) Act 2016. The first stage impact assessment has indicated that a more in-depth assessment was required.

An overview of the Integrated Impact Assessment has been included below in summary form only and it is essential that Members read the Integrated Impact Assessment, which is attached to the report at Appendix 1 for the purposes of the meeting.

Equalities Impact - Overall there will be more positive or neutral impacts than negative. Any potential negative impacts can be mitigated.

The proposal will have a positive impact on people with a disability as the Service will be more personalised than traditional support models, such as care homes and will support people that move into the scheme to achieve greater levels of independence. The Service will increase the range of accommodation and support options for people with a disability.

As the accommodation is one bedroom it may mean that potentially the Service may no longer be suitable to meet a person's needs due to maternity if the accommodation is not big enough to accommodate babies/children. However, if the person continues to have eligible care and support needs that requires social services intervention, a new Service will be identified in partnership with the person that would better meet their needs. Moving from the scheme may be unsettling for

the person; however, this would be taken into account when supporting the person to move into a different service.

The proposal will have a neutral impact on people with other protected characteristics as eligibility to receive a Service is not based on other protected characteristic(s) and the Service will be person centred based on the person's care plan and as such will be responsive to any requirements that a person has by virtue of their protected characteristic(s).

The tender process will ensure that a suitably experienced provider delivers the Service (i.e. experienced in delivering Services to people with disabilities). The contract will have clauses relating to ensuring compliance with the relevant equalities legislation. In addition the procurement process includes questions regarding equalities legislation.

The service will be monitored by the Common Commissioning Unit and the Unit will also analyse any complaints and safeguarding referrals regarding the scheme to identify if there are any concerns regarding the Service having a negative impact on people with a protected characteristic. The provider will also be required to implement their own monitoring systems, which will also help to identify if any aspect of the service has led to unintended/unidentified negative impacts.

All staff delivering the Service will receive equality and diversity training.

Socio- Economic Impact - Will have a positive impact as people will be supported to access eligible benefits and also supported, where appropriate, to access education, employment or volunteering opportunities. In addition people will be supported to make healthy lifestyle choices, including nutrition, exercise and social activities. This will help improve their socio-economic status.

Community Cohesion/ Social Exclusion/Poverty Impact - Will have a positive impact as the community based nature of the Service will help people to access community services and be active members of their local community. In addition people will be supported to access eligible benefits and also supported, where appropriate, to access education, employment or volunteering opportunities.

Welsh Language Impact - Will have a positive impact as the contract will obligate the provider to deliver the service in the resident's chosen first language.

Biodiversity Impact - Not applicable for the proposal to commission a care and support service.

Well-being of Future Generations Impact - Will have a positive impact on the five ways of working under the Well-being of Future Generation Act as the undertaking of a procurement process will ensure the delivery of services that improve the well-being of adults who live in the county borough.

Valleys Communities Impacts

No implications.

Workforce Impacts

No implications.

Legal Impacts

It is anticipated that the contract value will exceed the threshold of £663,540 for the Light Touch Regime set out in the Public Contract Regulations 2015. In addition the Council must comply with its own Contract Procedure Rules which apply to the letting of contracts. Under the Public Contract Regulations 2015, the Council is obliged to act in an open fair and transparent manner, ensuring that contract opportunities for such social care services are advertised to reach a wide market in order to encourage competition and to ensure equal treatment of all bidders. As such, the Council is required to undertake

a competitive procurement exercise for the service in accordance with the Light Touch Regime under Public Contract Regulations 2015 and its Contract Procedure Rules. The tender process to be undertaken will comply with relevant legislative and procedural requirements.

Risk Management Impacts

The winning bidder will be required to submit a contract mobilisation plan to ensure a smooth transfer of the Service. The implementation of this mobilisation plan will be monitored by Officers within the Common Commissioning Unit.

In addition, Case Managers will put in place a progression plan to support people to develop new skills in readiness for the move and to help people transition into the scheme. As part of this plan the Council will commission some additional hours of support for the first few weeks (number of weeks will be dependent on the needs of the individual resident) to help ensure that they have all the support they need to settle into their new home.

Consultation

There is no requirement for external consultation on this item.

The Social Services and Wellbeing (Wales) Act 2014 places importance on commissioners promoting co-production of service design with those that use services. Commissioners will make arrangements to ensure that those who move into the Core and Cluster Scheme are able to influence the design of the Service and that those who may wish to be part of the procurement evaluation are able to do so.

Recommendations

Having had due regard to the integrated impact assessment, it is recommended that if FCHA are granted the relevant planning permissions and take forward the construction of the accommodation, agreement is given for:

- a. The undertaking of a procurement exercise to commission care and support services to people living in the Core and Cluster Scheme.
- b. Following the procurement process, for the Head Adult Services to be granted delegated authority to enter into a contract with the bidder evaluated as offering the most economically advantageous tender (taking into account the quality and cost of the bids), for the provision of care and support to people residing in the Core and Cluster Scheme.

Reasons for Proposed Decision

Undertaking a procurement exercise for the delivery of care and support services within the Core and Cluster Scheme will ensure that the Council is legally compliant when purchasing these Services. In addition, this will ensure that the Council is best placed to continue meeting the needs and demands of those that require these Services through the purchasing of high quality and financially sustainable Services.

Implementation of Decision

The decision is proposed for implementation after the three day call in period.

Appendices

Appendix 1: Integrated Impact Assessment

List of Background Papers

None.

Officer Contact

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Mae'r dudalen hon yn fwriadol wag

Integrated Impact Assessment (IIA)

This Integrated Impact Assessment considers the duties and requirements of the following legislation in order to inform and ensure effective decision making and compliance:

- Equality Act 2010
- Welsh Language Standards (No.1) Regulations 2015
- Well-being of Future Generations (Wales) Act 2015
- Environment (Wales) Act 2016

Version Control

Version	Author	Job title	Date
Version 1	Chelé Zandra Howard	PO Commissioning	03.11.21

1. Details of the initiative

	Title of the Initiative: Commissioning of Care and Support Services in a Core and Cluster Scheme
1a	Service Area: Adult Services
1b	Directorate: Social Services, Health and Housing
1c	Summary of the initiative: To obtain Member approval to undertake a procurement exercise for the provision of care and support within a Core and Cluster Scheme and for the Head of Adult Services to receive delegated authority to enter into a contract with the winning bidder.
1d	Is this a 'strategic decision'? No
1e	Who will be directly affected by this initiative? People with a learning disability or mental health need that are assessed as requiring specially adapted accommodation that also meets their physical disability needs.
1f	When and how were people consulted?

	Case managers will discuss the option to move into the scheme if it is identified that this scheme can meet their eligible social care needs. Those that are identified to move into the scheme will be invited to take part in the procurement evaluation will be supported to do so. In addition, discussions will take place with those identified to move into the scheme to understand what is important to them, this will directly inform the contract.
1g	What were the outcomes of the consultation? The service model will be designed around the feedback from discussions with those that are identified to move into the scheme. The care and support that will be delivered is in line with the persons individual care plan.

2. Evidence

What evidence was used in assessing the initiative?

Care plans, assessment documentation, discussions with people.

Data in relation to the people identified to move into the scheme has not been included in this IIA as it could identify personal information about the people

Social Services routinely collects data as part of the assessment/review process of individuals which is reported to Welsh Government.

The following summarises some of the information recorded about people with learning disabilities and mental health needs known to Social Services (note that not all data fields have been completed in all cases, and this relates to various services received):

	People with learning disabilities				People with learning disabilities		
Age group	Female	Male	Total	Ethnicity	Female	Male	Total
20s	33	66	99	CHINESE		2	2
30s	33	44	77	OTHER		1	1
40s	25	25	50	OTHER MIXED		1	1
50s	28	21	49	WELSH	16	17	33
60s	21	23	44	WHITE BRITISH	136	163	299
70s	15	13	28	WHITE OTHER	1	1	2
80s	3		3	Not stated	5	7	12
Total	158	192	350	Total	158	192	350

Based on recorded data, those aged in their 20s represent the largest age group for people with learning disabilities, while 55% are male.

For people with mental health needs, those in their 50s represent the largest age group, with almost two-thirds (62%) of the total being male.

	People with mental health needs				People with mental health needs		
Age group	Female	Male	Total	Ethnicity	Female	Male	Total
40s	2		2				
50s	3	8	11	WELSH	3	2	5
60s	2	6	8	WHITE BRITISH	6	10	16
70s	1	4	5	Not stated	2	6	8
80s	1		1				
Total	11	18	29	Total	11	18	29

To provide geographical context, the following shows the wards where the clients reside:

Ward	People with learning disabilities	Ward	People with learning disabilities
ABERAVON	8	GWYNFI	4
ALLTWEN	3	LOWER BRYNAMMAN	4
BAGLAN	17	MARGAM	3
BLAENGWRACH	3	NEATH EAST	28
BRITON FERRY EAST	15	NEATH NORTH	10
BRITON FERRY WEST	12	NEATH SOUTH	14
BRYN AND CWMAVON	14	ONLLWYN	6
BRYN-COCH NORTH	4	PONTARDAWE	17
BRYN-COCH SOUTH	15	PORT TALBOT	9
CADOXTON	4	RESOLVEN	2
CIMLA	6	RHOS	9
COEDFFRANC CENTRAL	14	SANDFIELDS EAST	19
COEDFFRANC NORTH	2	SANDFIELDS WEST	12
COEDFFRANC WEST	8	SEVEN SISTERS	3
CRYNANT	3	SWANSEA	9
CWMLLYNFELL	1	TAI-BACH	23
CYMMER	3	TONNA	6
DYFFRYN	9	TREBANOS	7
GLYNCORRWG	4	UNKNOWN OUTSIDE NEATH PORT TALBOT	1
GLYNNEATH	7	Not stated	2
GODRE'R GRAIG	3	Total	350
GWAUN-CAE-GURWEN	7		

Ward	People with mental health needs
ABERAVON	4
COEDFFRANC WEST	1
DYFFRYN	2
GWAUN-CAE-GURWEN	1
MARGAM	1
NEATH EAST	3
NEATH NORTH	2
PONTARDAWE	1
PORT TALBOT	1
RESOLVEN	2
SANFIELDS EAST	1
SANFIELDS WEST	6
TAI-BACH	2
TREBANOS	1
YSTALYFERA	1
Total	29

- Western Bay Population Needs Assessment <http://www.westernbaypopulationassessment.org/en/learning/>
- Summary Statistics for South West Wales Region <https://gov.wales/sites/default/files/statistics-and-research/2020-05/summary-statistics-south-west-wales-region-2020-958.pdf>
- Daffodil data <http://www.daffodilcymru.org.uk/>
- Stats Wales <https://statswales.gov.wales/Catalogue/Population-and-Migration/Population/Estimates/Local-Authority/populationestimates-by-localauthority-year> and <https://statswales.wales.gov.uk/Catalogue/Equality-and-Diversity/Sexual-Identity/SexualIdentity-by-Area-IdentityStatus>
- ONS data from 2011 <https://www.ons.gov.uk/census>

3. Equalities

a) How does the initiative impact on people who share a **protected characteristic**?

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Protected Characteristic	+	-	+/-	Why will it have this impact?
Age			x	<p>The service to be commissioned will be delivered to adults across the spectrum of ages. The care will be person centred based on the persons care plan and as such will be responsive to any requirements that a person has by virtue of their age. Although the people identified to move into the scheme are working age, their eligibility to receive a service is not based on their age and they will be able to continue to receive the service once they become non-working age, as long as the service is still suitable to meet their eligible needs.</p> <p>All the people identified for the service will have agreed to receive this service and will be involved in developing the service model and tender pack. Any person that would like to play a part of the evaluation will be able to do so. This will help ensure that if any unidentified and unintended negative impacts arise, they will be identified and officers will look at processes to try mitigate them.</p> <p>The tender process will ensure that a suitably experienced provider delivers the service (i.e. experienced is delivering services to people with disabilities). The contract will have clauses relating to ensuring compliance with the relevant equalities legislation. In addition the procurement process includes questions regarding equalities legislation.</p> <p>The service will be monitored by the Common Commissioning Unit (which includes receiving resident's feedback) and the Unit will also analyse any complaints and safeguarding referrals regarding the scheme to identify if there are any concerns regarding the service having a negative impact on people with a protected characteristic. The provider will also be required to implement their own monitoring systems, which will also help to identify if any aspect of the service has led to unintended/unidentified negative impacts</p>

				All staff delivering the service will receive equality and diversity training.
Disability	x			<p>The service to be commissioned will have a positive impact on people as the service will be more personalised than traditional support models such as care homes and will support those moving into the scheme to achieve greater levels of independence. The service will increase the range of accommodation and support options for people with a disability.</p> <p>All the people identified for the service will have agreed to receive this service and will be involved in developing the service model and tender pack. Any person that would like to play a part of the evaluation will be able to do so. This will help ensure that if any unidentified and unintended negative impacts arise, they will be identified and officers will look at processes to try mitigate them.</p> <p>Although all the people identified will have indicated that they would like to move, it is acknowledged that moving into a service can be difficult and cause some anxiety and that this may be intensified in people with a disability (for example somebody may have a diagnosis of anxiety and find the process of moving to be overwhelming, or somebody may have a learning difficulty/disability that means they find it hard to understand information, or somebody may have a neurological difficulty/disability that makes it harder for them to get used to new routines and people) . We will have in place a progression plan to support people to develop new skills in readiness for the move and to help people transition into the new scheme. In addition, we will commission some additional hours of support for the first few weeks (number of weeks will be dependent on the needs of the individual resident) to help ensure that they have all the support they need to settle into their new home.</p> <p>The tender process will ensure that a suitably experienced provider delivers the service (i.e. experienced is delivering services to people with disabilities). The contract will have clauses relating to ensuring compliance with the relevant</p>

			<p>equalities legislation. In addition the procurement process includes questions regarding equalities legislation.</p> <p>The service will be monitored by the Common Commissioning Unit and the Unit will also analyse any complaints and safeguarding referrals regarding the scheme to identify if there are any concerns regarding the service having a negative impact on people with a protected characteristic. The provider will also be required to implement their own monitoring systems, which will also help to identify if any aspect of the service has led to unintended/unidentified negative impacts</p> <p>All staff delivering the service will receive equality and diversity training.</p>
Gender reassignment		x	<p>The service to be commissioned will be delivered to adults across the spectrum of gender identities and/or gender transitioning. The care will be person centred based on the persons care plan and as such will be responsive to any requirements that a person has by virtue of their gender identity/ gender transition (for example they may need support in making and attending medical appointments or support with medication relating to the gender reassignment process, or they may also need help to identify and attend support/social groups relating to gender reassignment). Their eligibility to receive a service is not based on their gender identity and they would be able to continue to receive the service if their gender identity changed at a later date, as long as the service is still suitable to meet their eligible needs (i.e. a change of service would not be because of a change to their gender identity).</p> <p>All the people identified for the service will have agreed to receive this service and will be involved in developing the service model and tender pack. Any person that would like to play a part of the evaluation will be able to do so. This will help ensure that if any unidentified and unintended negative impacts arise, they will be identified and officers will look at processes to try mitigate them.</p> <p>The tender process will ensure that a suitably experienced provider delivers the service (i.e. experienced is delivering services to people with disabilities). The</p>

			<p>contract will have clauses relating to ensuring compliance with the relevant equalities legislation. In addition the procurement process includes questions regarding equalities legislation.</p> <p>The service will be monitored by the Common Commissioning Unit and the Unit will also analyse any complaints and safeguarding referrals regarding the scheme to identify if there are any concerns regarding the service having a negative impact on people with a protected characteristic. The provider will also be required to implement their own monitoring systems, which will also help to identify if any aspect of the service has led to unintended/unidentified negative impacts</p> <p>All staff delivering the service will receive equality and diversity training.</p>
<p>Marriage & civil partnership</p>		<p>x</p>	<p>The care will be person centred based on the persons care plan and as such will be responsive to any requirements that a person has by virtue of their marriage/civil partnership. Their eligibility to receive a service is not based on their marriage/civil partnership and they would be able to continue to receive if marriage/civil partnership status changed at a later date, as long as the service is still suitable to meet their eligible needs (i.e. a change of service would not be because of a change to their marriage/civil partnership status).</p> <p>All the people identified for the service will have agreed to receive this service and will be involved in developing the service model and tender pack. Any person that would like to play a part of the evaluation will be able to do so. This will help ensure that if any unidentified and unintended negative impacts arise, they will be identified and officers will look at processes to try mitigate them.</p> <p>The tender process will ensure that a suitably experienced provider delivers the service (i.e. experienced is delivering services to people with disabilities). The contract will have clauses relating to ensuring compliance with the relevant equalities legislation. In addition the procurement process includes questions regarding equalities legislation.</p>

			<p>The service will be monitored by the Common Commissioning Unit and the Unit will also analyse any complaints and safeguarding referrals regarding the scheme to identify if there are any concerns regarding the service having a negative impact on people with a protected characteristic. The provider will also be required to implement their own monitoring systems, which will also help to identify if any aspect of the service has led to unintended/unidentified negative impacts</p> <p>All staff delivering the service will receive equality and diversity training.</p>
<p>Pregnancy and maternity</p>		<p>x</p>	<p>None of the people identified currently have a protected characteristic by virtue of their pregnancy/maternity status. However it is possible that they may experience pregnancy/maternity at a later date.</p> <p>The accommodation will be one bedroom so potentially the service may no longer be suitable to meet the person's needs due to maternity if the accommodation is not big enough to accommodate babies/children. However, if the person continues to have eligible care and support needs that requires social services intervention, a new service will be identified in partnership with the person that would better meet their needs. Moving from the scheme may be unsettling for the person, however this would be taken into account when supporting the person to move into a different service.</p> <p>All the people identified for the service will have agreed to receive this service and will be involved in developing the service model and tender pack. Any person that would like to play a part of the evaluation will be able to do so. This will help ensure that if any unidentified and unintended negative impacts arise, they will be identified and officers will look at processes to try mitigate them.</p> <p>The tender process will ensure that a suitably experienced provider delivers the service (i.e. experienced is delivering services to people with disabilities). The contract will have clauses relating to ensuring compliance with the relevant</p>

			<p>equalities legislation. In addition the procurement process includes questions regarding equalities legislation.</p> <p>The service will be monitored by the Common Commissioning Unit and the Unit will also analyse any complaints and safeguarding referrals regarding the scheme to identify if there are any concerns regarding the service having a negative impact on people with a protected characteristic. The provider will also be required to implement their own monitoring systems, which will also help to identify if any aspect of the service has led to unintended/unidentified negative impacts</p> <p>All staff delivering the service will receive equality and diversity training.</p>
Race		x	<p>The care will be person centred based on the persons care plan and as such will be responsive to any requirements that a person has by virtue of their race (for example support to access social activities or groups). Their eligibility to receive a service is not based on their race.</p> <p>All the people identified for the service will have agreed to receive this service and will be involved in developing the service model and tender pack. Any person that would like to play a part of the evaluation will be able to do so. This will help ensure that if any unidentified and unintended negative impacts arise, they will be identified and officers will look at processes to try mitigate them.</p> <p>The tender process will ensure that a suitably experienced provider delivers the service (i.e. experienced is delivering services to people with disabilities). The contract will have clauses relating to ensuring compliance with the relevant equalities legislation. In addition the procurement process includes questions regarding equalities legislation.</p> <p>The service will be monitored by the Common Commissioning Unit and the Unit will also analyse any complaints and safeguarding referrals regarding the scheme to identify if there are any concerns regarding the service having a negative impact on</p>

			<p>people with a protected characteristic. The provider will also be required to implement their own monitoring systems, which will also help to identify if any aspect of the service has led to unintended/unidentified negative impacts</p> <p>All staff delivering the service will receive equality and diversity training.</p>
<p>Religion or belief</p>		<p>x</p>	<p>The care will be person centred based on the persons care plan and as such will be responsive to any requirements that a person has by virtue of their religion/belief (for example support accessing a place of worship, attending groups, managing a particular diet, etc.). Their eligibility to receive a service is not based on their religion/belief.</p> <p>All the people identified for the service will have agreed to receive this service and will be involved in developing the service model and tender pack. Any person that would like to play a part of the evaluation will be able to do so. This will help ensure that if any unidentified and unintended negative impacts arise, they will be identified and officers will look at processes to try mitigate them.</p> <p>The tender process will ensure that a suitably experienced provider delivers the service (i.e. experienced is delivering services to people with disabilities). The contract will have clauses relating to ensuring compliance with the relevant equalities legislation. In addition the procurement process includes questions regarding equalities legislation.</p> <p>The service will be monitored by the Common Commissioning Unit and the Unit will also analyse any complaints and safeguarding referrals regarding the scheme to identify if there are any concerns regarding the service having a negative impact on people with a protected characteristic. The provider will also be required to implement their own monitoring systems, which will also help to identify if any aspect of the service has led to unintended/unidentified negative impacts</p> <p>All staff delivering the service will receive equality and diversity training.</p>

Sex			x	<p>The service to be commissioned will be delivered to adults across the spectrum of sexes. The care will be person centred based on the persons care plan and as such will be responsive to any requirements that a person has by virtue of their sex. Their eligibility for the service is not based on their sex.</p> <p>All the people identified for the service will have agreed to receive this service and will be involved in developing the service model and tender pack. Any person that would like to play a part of the evaluation will be able to do so. This will help ensure that if any unidentified and unintended negative impacts arise, they will be identified and officers will look at processes to try mitigate them.</p> <p>The tender process will ensure that a suitably experienced provider delivers the service (i.e. experienced is delivering services to people with disabilities). The contract will have clauses relating to ensuring compliance with the relevant equalities legislation. In addition the procurement process includes questions regarding equalities legislation.</p> <p>The service will be monitored by the Common Commissioning Unit and the Unit will also analyse any complaints and safeguarding referrals regarding the scheme to identify if there are any concerns regarding the service having a negative impact on people with a protected characteristic. The provider will also be required to implement their own monitoring systems, which will also help to identify if any aspect of the service has led to unintended/unidentified negative impacts</p> <p>All staff delivering the service will receive equality and diversity training.</p>
Sexual orientation			x	<p>The care will be person centred based on the persons care plan and as such will be responsive to any requirements that a person has by virtue of their sexual orientation (for example support to access social activities or groups). Their eligibility to receive a service is not based on their sexual orientation.</p>

			<p>All the people identified for the service will have agreed to receive this service and will be involved in developing the service model and tender pack. Any person that would like to play a part of the evaluation will be able to do so. This will help ensure that if any unidentified and unintended negative impacts arise, they will be identified and officers will look at processes to try mitigate them.</p> <p>The tender process will ensure that a suitably experienced provider delivers the service (i.e. experienced is delivering services to people with disabilities). The contract will have clauses relating to ensuring compliance with the relevant equalities legislation. In addition the procurement process includes questions regarding equalities legislation.</p> <p>The service will be monitored by the Common Commissioning Unit and the Unit will also analyse any complaints and safeguarding referrals regarding the scheme to identify if there are any concerns regarding the service having a negative impact on people with a protected characteristic. The provider will also be required to implement their own monitoring systems, which will also help to identify if any aspect of the service has led to unintended/unidentified negative impacts</p> <p>All staff delivering the service will receive equality and diversity training.</p>
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<p>What action will be taken to improve positive or mitigate negative impacts?</p>
<ul style="list-style-type: none"> • Commissioning team to monitor the service through the yearly contract monitoring process to ensure compliance with relevant legislation and guidance • Commissioning team to monitor safeguarding referrals and complaints regarding the service • Implement transition plan for those moving into the service • Provider to implement monitoring systems

b) How will the initiative assist or inhibit the ability to meet the **Public Sector Equality Duty**?

Public Sector Equality Duty (PSED)	+	-	+/-	Why will it have this impact?
To eliminate discrimination, harassment and victimisation	x			Enables people with a disability to live independently in their own tenancies within the community. As such, people will not be discriminated against being able to have their own tenancy and home due to having a disability.
To advance equality of opportunity between different groups	x			People with a disability will have an equal opportunity to live in their own home within their community as those who do not have a disability.
To foster good relations between different groups	x			The community based nature of the service will help people to access community services and be active members of their local community.

What action will be taken to improve positive or mitigate negative impacts?
<ul style="list-style-type: none"> • Link in with non-statutory and third sector services to help connect people to their communities • Commissioning team to monitor the service through the yearly contract monitoring process to ensure compliance with relevant legislation and guidance • Commissioning team to monitor safeguarding referrals and complaints regarding the service • Implement transition plan for those moving into the service • Provider to implement monitoring systems

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4. Socio Economic Duty

Impact	Details of the impact/advantage/disadvantage
Positive/Advantage	Will have a positive impact as people will be supported to access eligible benefits and also supported, where appropriate, to access education, employment or volunteering opportunities. In addition people will be supported to make healthy lifestyle choices, including nutrition, exercise and social activities. This will help improve their socio-economic status.
Negative/Disadvantage	
Neutral	

What action will be taken to reduce inequality of outcome

- Link in with non-statutory and third sector services to help connect people to their communities
- Commissioning team to monitor the service through the yearly contract monitoring process to ensure compliance with relevant legislation and guidance
- Commissioning team to monitor safeguarding referrals and complaints regarding the service
- Provider to implement monitoring systems

5. Community Cohesion/Social Exclusion/Poverty

	+	-	+/-	Why will it have this impact?
Community Cohesion	x			The community based nature of the service will help people to access community services and be active members of their local community.

Social Exclusion	x			The community based nature of the service will help people to access community services and develop friendships groups.
Poverty	x			People will be supported to access eligible benefits and also supported, where appropriate, to access education, employment or volunteering opportunities.

What action will be taken to improve positive or mitigate negative impacts?

- Commissioning team to monitor the service through the yearly contract monitoring process to ensure compliance with relevant legislation and guidance
- Commissioning team to monitor safeguarding referrals and complaints regarding the service
- Provider to implement monitoring systems
- Link in with non-statutory and third sector services to help connect people to their communities

6. Welsh

	+	-	+/-	Why will it have this effect?
What effect does the initiative have on: – people's opportunities to use the Welsh language	x			The contract will obligate the provider to deliver the service in the residents chosen first language
– treating the Welsh and English languages equally	x			The contract will obligate the provider to deliver the service in the residents chosen first language

What action will be taken to improve positive or mitigate negative impacts?

- Commissioning team to monitor the service through the yearly contract monitoring process to ensure compliance with relevant legislation and guidance
- Commissioning team to monitor safeguarding referrals and complaints regarding the service
- Provider to implement monitoring systems

7. Biodiversity

How will the initiative assist or inhibit the ability to meet the **Biodiversity Duty**?

Biodiversity Duty	+	-	+/-	Why will it have this impact?
To maintain and enhance biodiversity			x	Not applicable for the proposal to commission a care and support service
To promote the resilience of ecosystems, i.e. supporting protection of the wider environment, such as air quality, flood alleviation, etc.			x	Not applicable for the proposal to commission a care and support service
What action will be taken to improve positive or mitigate negative impacts?				
Not applicable for the proposal to commission a care and support service				

8. Well-being of Future Generations

How have the five ways of working been applied in the development of the initiative?

Ways of Working	Details
i. Long term – looking at least 10 years (and up to 25 years) ahead	The service is more progressive and enabling than traditional care models. The service will be flexible and is designed to be future proof so that people can continue to live in the scheme as long as it meets their eligible care and support needs.
ii. Prevention – preventing problems occurring or getting worse	This is a more enabling service that will help people to build on and develop their independence and prevents the need for more institutionalised care models.
iii. Collaboration – working with other services internal or external	The service to be commissioned will work with the RSL and non-statutory services to deliver personalised care and support to the person. There will be clauses in the contract and requiring the provider to work in collaboration to deliver the overall service that the person receives.
iv. Involvement – involving people, ensuring they reflect the diversity of the population	The things that are important to the people identified to move into the scheme will influence the service specification and people will be invited to play a part in the evaluation process.
v. Integration – making connections to maximise contribution to:	The service is community based and people will be supported to become active members of their local communities.
Council's well-being objectives	To improve the well-being of all adults who live in the county borough.
Other public bodies objectives	

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9. Monitoring Arrangements

Provide information on the monitoring arrangements to:

Monitor the impact of the initiative on Equalities, Community Cohesion, the Welsh Measure, Biodiversity Duty and the Wellbeing Objectives.

The service will be monitored by the Common Commissioning Unit and the Unit will also analyse any complaints and safeguarding referrals regarding the scheme to identify if there are any concerns regarding the service having a negative impact on people with a protected characteristic. The provider will also be required to implement their own monitoring systems, which will also help to identify if any aspect of the service has led to unintended/unidentified negative impacts

10. Assessment Conclusions

Please provide details of the conclusions reached in relation to each element of the assessment:

	Conclusion
Equalities	<p>Overall there will be more positive or neutral impacts than negative. Any potential negative impacts can be mitigated.</p> <p>The proposal will have a positive impact on people with a disability as the service will be more personalised than traditional support models such as care homes and will support people that move into the scheme to achieve greater levels of independence. The service will increase the range of accommodation and support options for people with a disability.</p> <p>As the accommodation is one bedroom it may mean that potentially the service may no longer be suitable to meet a person's needs due to maternity if the accommodation is not big enough to accommodate babies/children. However, if the person continues to have eligible care and support needs that requires social services intervention, a new service will be identified in partnership with the person that would better meet their needs. Moving from the scheme may be unsettling for the person,</p>

	<p>however this would be taken into account when supporting the person to move into a different service.</p> <p>The proposal will have a neutral impact on people with other protected characteristics as eligibility to receive a service is not based on other protected characteristic(s) and the service will be person centred based on the persons care plan and as such will be responsive to any requirements that a person has by virtue of their protected characteristic(s).</p> <p>The tender process will ensure that a suitably experienced provider delivers the service (i.e. experienced is delivering services to people with disabilities). The contract will have clauses relating to ensuring compliance with the relevant equalities legislation. In addition the procurement process includes questions regarding equalities legislation.</p> <p>The service will be monitored by the Common Commissioning Unit and the Unit will also analyse any complaints and safeguarding referrals regarding the scheme to identify if there are any concerns regarding the service having a negative impact on people with a protected characteristic. The provider will also be required to implement their own monitoring systems, which will also help to identify if any aspect of the service has led to unintended/unidentified negative impacts</p> <p>All staff delivering the service will receive equality and diversity training.</p>
Socio Economic Disadvantage	<p>Will have a positive impact as people will be supported to access eligible benefits and also supported, where appropriate, to access education, employment or volunteering opportunities. In addition people will be supported to make healthy lifestyle choices, including nutrition, exercise and social activities. This will help improve their socio-economic status.</p>
Community Cohesion/ Social Exclusion/Poverty	<p>Will have a positive impact as the community based nature of the service will help people to access community services and be active members of their local community. In addition people will be supported to access eligible benefits and also supported, where appropriate, to access education, employment or volunteering opportunities.</p>
Welsh	<p>Will have a positive impact as the contract will obligate the provider to deliver the service in the residents chosen first language.</p>

Biodiversity	Not applicable for the proposal to commission a care and support service.
Well-being of Future Generations	Will have a positive impact on the five ways of working under the Well-being of Future Generation Act as the undertaking of a procurement process will ensure the delivery of services that improve the well-being of adults who live in the county borough.

Overall Conclusion

Please indicate the conclusion reached:

- **Continue** - as planned as no problems and all opportunities have been maximised x
- **Make adjustments** - as potential problems/missed opportunities/negative impacts have been identified along with mitigating actions
- **Justification** - for continuing with the initiative even though there is a potential for negative impacts or missed opportunities
- **STOP** - redraft the initiative as actual or potential unlawful discrimination has been identified

Please provide details of the overall conclusion reached in relation to the initiative

The service will support people with a disability to live more independently and integrate into their local community. The service is person centred so that each resident will receive support that takes into account their individual needs.

11. Actions

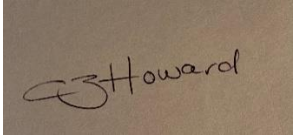
What actions are required in relation to obtaining further data/information, to reduce or remove negative impacts or improve positive impacts?

Action	Who will be responsible for seeing it is done?	When will it be done by?	How will we know we have achieved our objective?
Commissioning team to monitor the service through the yearly contract monitoring process to ensure compliance	PO Commissioning	Within first 3 months of service commencing and then annually. Additional monitoring if issues identified	Monitoring reports

with relevant legislation and guidance			
Commissioning team to monitor safeguarding referrals and complaints regarding the service	PO Commissioning	Annually	Monitoring reports
Implement transition plan for those moving into the service	PO for Complex Disability Community Mental Health	Throughout the period of transition into the scheme, exact timescales will be dependent on the persons individual needs	Resident's feedback via care plan reviews and residents sustained in their tenancy.
Provider to implement monitoring systems	Provider	Quarterly	Monitoring reports
Link in with non-statutory and third sector services to help connect people to their communities	PO for Complex Disability Community Mental Health	As part of developing care and support plan and at review	Referral into appropriate services
The flats will be one bedroom so potentially the service may no longer be suitable to meet the person's needs due to maternity if the flats were not big enough to accommodate babies/children. However, if the person continues to have eligible care and support needs that requires social services intervention, a new service will be identified in partnership with the person	PO for Complex Disability Community Mental Health	This is a future potential situation that could occur, at this point in time no further action required	People able to access services to meet their individual requirements.

that would better meet their needs. Moving from the scheme may be unsettling for the person, however this would be taken into account when supporting the person to move into a different service.			
People that are to receive a service to inform service specification	PO Commissioning	In line with procurement timeline	Contract will be shaped by feedback from those using the service
People that are to receive a service to be invited to play a part in the tender evaluation	PO Commissioning	In line with procurement timeline	People will have had the opportunity to take part in the evaluation
The contract will have clauses relating to ensuring compliance with the relevant equalities legislation.	PO Commissioning	In line with procurement timeline	Contract includes required clauses
Procurement process to include questions regarding equalities legislation	PO Commissioning	In line with procurement timeline	Procurement questions to include relevant questions
The contract will obligate the provider to deliver the service in the residents chosen first language	PO Commissioning	In line with procurement timeline	Contract includes required clauses
Link in with non-statutory and third sector services to help connect people to their communities	PO for Complex Disability Community Mental Health	As part of developing care and support plan and at review	Referral into appropriate services
All staff delivering the service will receive equality and diversity training.	Provider	As part of staff induction training	Training records

12. Sign off

	Name	Position	Signature	Date
Completed by	Chelé Zandra Howard	PO Commissioning		03/11/21
Signed off by	Angela Thomas	Head of Service/Director	A.Thomas	03/11/21

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Mae'r dudalen hon yn fwiadol wag



Cyngor Castell-nedd Port Talbot
Neath Port Talbot Council

NEATH PORT TALBOT COUNTY BOROUGH COUNCIL Social Care, Health & Well-being Cabinet Board

9th December 2021

Report of the Head of Adult Services – Ms A. Thomas

Matter for Decision

Wards Affected All Wards

IMPLEMENTATION OF A QUALITY ASSURANCE FRAMEWORK FOR THE PROVISION OF LEARNING DISABILITY AND MENTAL HEALTH SUPPORTED LIVING SERVICES IN NEATH PORT TALBOT

Purpose of the Report

To present Members with the draft Quality Assurance Framework (QAF) and the associated consultation report in order to request permission to implement the QAF.

Executive Summary

The Quality Assurance Framework (QAF) (Appendix 1) sets out the proposed criteria against which providers of Supported Living Schemes for adults with learning disabilities and/or mental health conditions in Neath Port Talbot will be assessed.

On 1st April 2021, Members agreed for Officers to undertake a 90 day public consultation on the proposed QAF (Background Paper 1). This public consultation is now completed and an evaluation of the responses (Appendix 2) has been used to further improve the QAF.

Subsequently QAF has been brought back to Members to approve its implementation.

Background

The provision of good quality and responsive adult social care support remains a priority of the Council. The Council also has a responsibility to ensure that public funds are spent efficiently and effectively.

The purpose of the QAF is to provide the Council and its partners with a methodology for assessing the quality of service provision against various criteria affecting the day to day life of those adults placed in Supported Living Schemes.

To further strengthen the impact of the QAF, Officers undertook a 90 day public consultation. The aim of this consultation was to:

- Make sure that all interested parties are aware of the Council's proposed QAF.
- Make sure that people have all the information they need to come to an informed opinion.
- Encourage people to give their views on the QAF.
- Make sure people know how to submit their views.
- Collect feedback and consider this before a final draft QAF is submitted for approval.

This consultation ran for the period 27th July 2021 to the 19th September 2021. The consultation documents included easy read versions in both English and Welsh (Background Papers 2-5).

An evaluation of the consultation responses has now taken place and the feedback incorporated into the final draft QAF. As such, the draft QAF has been brought back to Members for approval.

Financial Impacts

There are no financial impacts arising from this report. It is not expected that implementation will likely incur any additional

expenditure, nor will any additional income flows likely be received as a consequence.

Integrated Impact Assessment

An Impact Assessment was undertaken on 18.02.21 (Background Paper 6). This concluded that:

“Overall the QAF will have a neutral impact on protected characteristics. The purpose of the QAF is to set out the criteria against which providers of Supported Living Schemes for adults with learning disabilities and/or mental health conditions in Neath Port Talbot are assessed. Should any negative impacts come to light these will be addressed and brought to Members’ attention.”

In light of the consultation exercise and additional considerations placed on Local Authorities since the previous assessment, a new impact assessment was undertaken in order to assist the Council in discharging its legislative duties (under the Equality Act 2010, the Welsh Language Standards (No.1) Regulations 2015, the Well-being of Future Generations (Wales) Act 2015 and the Environment (Wales) Act 2016.

An overview of the Integrated Impact Assessment has been included below in summary form only and it is essential that Members read the Integrated Impact Assessment, which is attached to the report at Appendix 3, for the purposes of the meeting.

- Equality Impacts - Will have a positive impact on people with protected characteristic as the QAF will support the continuous improvement and best practice in Supported Living Schemes and help identify changes that would make it easier for providers to enable service users to achieve their personal outcomes. The consultation process did not indicate that any further action

needed to be undertaken to improve positive impacts or mitigate negative impacts.

- Socio-Economic Disadvantage Impacts - Will have a positive impact on mitigating socio-economic disadvantage as there are a number of themes that help positively improve socio-economic factors. The consultation process did not indicate that any further action needed to be undertaken to improve positive impacts or mitigate negative impacts.
- Community Cohesion/ Social Exclusion/Poverty Impacts - Will have a positive impact on community cohesion, social exclusion and poverty, as a number of themes that help positively impact on these areas. The consultation process did not indicate that any further action needed to be undertaken to improve positive impacts or mitigate negative impacts.
- Welsh Language Impacts - Neutral impact as will not have any impact on a person's ability to have a service in their language of choice. Contracts for commissioned services contain clauses to ensure the provider delivers services in line with the Welsh Language Act.
- Biodiversity Impacts – Not applicable
- Wellbeing of Future Generations Impacts - This will have a positive impact on meeting the five ways of working under the Well-being of Future Generation Act as a number of themes in the QAF help positively impact on these areas. The consultation process did not indicate that any further action needed to be undertaken to improve positive impacts or mitigate negative impacts.

Valleys Communities Impacts

Supported Living Schemes are located across Neath Port Talbot and there was no indication in the development of the QAF or the

consultation process that the proposed QAF would have a different or disproportionate impacts (weather that be positive or negative) on Valley Communities.

Workforce Impacts

The QAF will be undertaken by Contract Monitoring Officers, it is not anticipated that this work will have any workforce impacts on the relevant Officers, as this will replace the current system for monitoring Supported Living Schemes. In addition, the Monitoring Officers played a fundamental role in the development of the QAF.

Legal Impacts

The QAF has been developed in line with the Social Services and Well-being (Wales) Act 2014, Regulations and Codes of Practice that set out the Council's duty to assess an individual's need for care and support, as well as the Well-being of Future Generations Act (Wales) Act 2015 which includes responsibility for ensuring sustainability of services.

Risk Management Impacts

There are no risks associated with this item.

Consultation

This item has been subject to external consultation, the consultation report can be found at Appendix 2.

Feedback from this consultation process has directly influenced the draft QAF and the additional areas included as a result of the consultation have been highlighted in red on the QAF (Appendix 1).

Recommendations

Having had due regard to the integrated impact assessment and the consultation report, it is recommended that the Quality Assurance Framework, as set out in Appendix 1 is approved for use by Officers.

Reasons for Proposed Decision

To ensure sustainable and good quality Supported Living Schemes are available to meet the needs of adults in Neath Port Talbot with learning disabilities and mental health needs.

Implementation of Decision:

The decision is proposed for implementation after the three day call in period.

Appendices

Appendix 1: Quality Assurance Framework

Appendix 2: Consultation Report

Appendix 3: Integrated Impact Assessment

List of Background Papers

Background Paper 1: Cabinet Report of the 1st April 2021

<http://moderngov.npt.gov.uk/documents/s68660/Quality%20Assurance%20Framework%20for%20the%20Provision%20of%20Learning%20Disability%20and%20Mental%20Health%20Supported%20Liv.pdf>

Background Paper 2: Consultation Document (English)

Background Paper 3: Consultation Document (Welsh)

Background Paper 4: Consultation Document Easy Read (English)

Background Paper 5: Consultation Document Easy Read (Welsh)

Background Paper 6: First Stage Equality Impact Assessment dated 18.02.21

<http://moderngov.npt.gov.uk/documents/s68663/App%203%20-%20Quality%20Assurance%20Framework.pdf>

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Cyngor Castell-nedd Port Talbot
Neath Port Talbot Council

NEATH PORT TALBOT COUNTY BOROUGH COUNCIL

SOCIAL SERVICES, HEALTH AND HOUSING

**QUALITY ASSURANCE FRAMEWORK FOR THE PROVISION OF
LEARNING DISABILITY AND MENTAL HEALTH SUPPORTED LIVING
SERVICES IN THE NEATH PORT TALBOT UNITARY AUTHORITY AREA**

February 2020

Tudalen317

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2. Introduction and Background

Neath Port Talbot Council (“the Council”) is committed to working closely with service users, their families, service providers, partners and others to ensure services are of good quality and meet assessed needs. In line with the principles of the Social Services and Wellbeing (Wales) Act 2014 (“the Act”), the focus is on independence, choice and control.

This Quality Assurance Framework (QAF) is one way by which the Council can better understand the quality of services being delivered. The QAF will cover both Learning Disability and Mental Health services, including those services for people who may be considered as having complex needs.

It has been agreed as part of this work that the Council will formally review this QAF by **April 2022** at the latest, **and sooner if necessary**.

Note

It should be noted that the Council is continually looking to improve the way it reviews services, and may adjust this Framework in consultation with service providers and others.

3. Objectives and Key Principles

The objectives of the QAF are to:

- Benchmark services so that commissioners, service providers and others may better understand how well support is delivered relative to the outcomes agreed for service users
- Encourage continuous improvement and best practice in supported living services
- Help identify changes that would make it easier for providers to enable service users to achieve their personal outcomes

- Encourage more collaborative working with providers, service users, their family and others so a multi-faceted view of 'quality' may be obtained
- To have a clear sense of what quality means in practical terms in operational services

All current domains, sub-domains and measures can be found in Schedule 1 of this document.

4 Structure of the Quality Assurance Framework

The Framework consists of **five** overarching **Quality Domains**:

- A. Relationship, Engagement and Quality of Life;
- B. Health and Wellbeing;
- C. Leadership, Management and Staff;
- D. Care and Support Planning and Governance;
- E. The Environment, Health and Safety, and Safeguarding;

These are the high level themes which will be considered as part of the Council's monitoring work and will be used as a way of organising the **Sub-Domains**, or areas that may be considered during visits. These Sub-Domains are organised in the following way –

4.1 Relationship, Engagement and Quality of Life

- a) New Service Users and their close relatives are assisted with transition and resettlement
- b) Delivering support to meet the needs and wishes of Service Users
- c) The Provider helps ensure that Service Users have a rich and varied range of activities/interests and engage appropriately with friends, family members and the community at large
- d) There is a real sense of community in the scheme
- e) There is evidence that Service Users have a meaningful voice, choice and control over how the support service is delivered
- f) At all times personal identity is appropriately promoted and maintained in the scheme
- g) Dignity and respect is maintained at all times
- h) There is clear evidence that the views of Service Users, family members and others shape future provision and drive service improvement. A wide range of sources are used to strengthen the quality of the service

4.2 Health and Wellbeing

- a) A healthy lifestyle is always promoted within the scheme

- b) Service Users have access to a full range of healthcare services and the staff team appropriately engages with social care and health professionals when appropriate
- c) Good nutrition and hydration is maintained and service users share a positive dining experience. Service Users are appropriately supported according to best practice
- d) Medication is managed according to best practice
- e) When appropriate there is evidence to demonstrate that good moving and handling techniques are being practiced
- f) Service Users are supported and encouraged to have appropriate rest and sleep
- g) How well the service supports Service Users to meet the National Wellbeing Statement is understood by the Provider

4.3 Leadership, Management and Staff

- a) Good leadership and management is present which filters down to operational level
- b) There is a culture among management and staff that promotes service quality and continuous improvement
- c) There is an effective rota management process that allocates resources to maximise opportunities for everyone supported
- d) Staff induction and training meets the requirement of the contract and is specific to the needs of each person supported
- e) Supervision and appraisals
- f) Recruitment and selection meets the requirement of the contract and is specific to the needs of each person supported
- h) Staff feel well supported by management and terms of employment for staff are considered good by the sector

4.4 Care and Support Planning and Governance

- a) Care planning documentation is presented in line with best practice
- b) Support hours are well managed and the hours apportioned to each service user are clear
- c) **The provider structures a process that works well to maximise independence and includes other fundamentals under the Wellbeing Act such as maintaining appropriate choice and control**
- d) Behaviour Observation Charts or similar are used to good effect to manage behaviours

4.5 The Environment, Health and Safety and Safeguarding

- a) The property is maintained to a good standard
- b) The provider complies with the requirements of Health and Safety standards
- c) Service Users are supported to comply with the terms of their tenancy
- d) The Provider has policies and procedures for safeguarding Service Users in line with best practice

4.6 Cross Cutting Themes

Progression and Recovery Models

- The service delivered is strengthened to support Service Users in making positive life choices
- When appropriate, the progression or recovery model adopted works well and there is clear evidence of increasing independence towards more independent living

Complex Disability

- The service delivered is strengthened to support those Service Users who may be considered to have complex needs
- The Provider has systems and processes in place that monitors and reduces restrictive practice and there is clear evidence that this practice is working

Under these Sub-Domains are **Quality Measures** which are indicators against which the Council will measure service quality and performance. The Council's Contract Monitoring Officer will undertake an assessment using the criteria to judge whether each relevant Quality Measure has been fully, partially or not met by the provider.

The conclusion against each Quality Measure will form a report shared with the provider.

5. Monitoring Services

The Council's Social Services, Health and Housing Directorate is committed to working with Providers so we can offer the very best support for people with assessed social care needs in Neath Port Talbot. The Council has robust processes in place that help ensure providers are supported to continually improve the way they deliver care and support. These processes are multi-faceted and include a number of ways in which 'quality' can be benchmarked. This QAF will be used by the Council's Contract Monitoring Officers to gauge how well the provider delivers support commissioned by the Council.

It should be recognised that the QAF is only one of a number of ways in which the Council defines quality in services. Other ways include but may not be limited to –

- i) Care Inspectorate Wales (CIW) inspection reports (also compliance/enforcement notices and any other relevant information)
- ii) Safeguarding information
- iii) Information received from Social Services Care Managers
- iv) Complaints or other information received
- v) Information received from Swansea Bay University Health Board (SBUHB) nurse assessor teams (including outcomes from nurse assessor patient reviews), district nursing teams and end of life pathways coordinators
- vi) Information received from public health/environmental health departments
- vii) Information received via the Pan Wales Commissioning Network
- viii) Information on hospital conveyances received via SBUHB

These sources will help give an overall view on how well the provider is delivering supported living services in Neath Port Talbot.

Glossary of terms

COSHH – Control of Substances Hazardous to Health (and related Regulations)

National Wellbeing Statement - The statement describes the national well-being outcomes for people who need care and support and carers who need support. The statement builds on the definition of well-being in the Social Services and Well-being (Wales) Act 2014

POVA – Protection of Vulnerable Adults (and related Safeguarding Regulations)

Provider – An organisation commissioned to provide the service

Quality Domains – The main areas against which service quality will be measured

Quality Measures – Tools to help us measure the quality of service

SBUHB – Swansea Bay University Health Board – The organisation responsible for the provision of health care in the Neath Port Talbot and Swansea areas.

Scheme – The location where the service is delivered

Service – The care and support delivered by the Service Provider

Service Provider - (see Provider)

Service User – People who use or are affected by services

SMART – Specific Measurable Achievable Relevant Time-bound

Sub-Domains – A sub-division of a Quality Domain

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SCHEDULE 1 – THE NEATH PORT TALBOT COUNCIL LEARNING DISABILITY AND MENTAL HEALTH QUALITY ASSURANCE FRAMEWORK

QUALITY DOMAINS, SUB-DOMAINS AND MEASURES

The table below highlights the overarching quality domains for the Quality Assurance Framework (QAF) and the indicators linked to those domains. Each indicator below will have measures that will be used to help the provider achieve each indicator.

Neath Port Talbot County Borough Council, Supported Living Services

	A	B	C	D	E
Overarching themes:	Relationships, Engagement and Quality of Life	Health and Wellbeing	Leadership, Management and Staff	Care and Support Planning and Governance	The Environment, Health and Safety and Safeguarding
1	New Service Users and their close relatives are assisted with transition and resettlement	A healthy lifestyle is always promoted in the scheme	Good leadership and management is present which filters down to operational level	Care planning documentation is presented in line with best practice	The property is clean and maintained to a good standard
2	Delivering Support to meet the needs and wishes of Service Users	Service Users have access to the full range of healthcare services and the staff team appropriately engages with social care and health professionals	There is a culture among the management and staff that promotes quality and continuous improvement	Support hours are well managed and the hours apportioned to each Service User are clear	The Provider complies with the requirements of H&S standards

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		when appropriate			
3	The Provider helps ensure that Service Users have a rich and varied range of activities/interests and engage appropriately with friends, family members and the community at large	Good nutrition, hydration is maintained and service users share a positive dining experience. Service Users are appropriately supported according to best practice	There is an effective rota management process that allocates resources to maximise opportunities for everyone supported	The Provider structures a process that works well, in terms of care planning, to maximise independence	Service Users are supported to comply with the terms of their tenancy
4	There is a real sense of community in the scheme	Medication is managed according to best practice	Staff induction and training meets the requirement of the contract and is specific to the needs of each person supported	Behaviour Observation Charts or similar are used to good effect	The Provider has a policy and procedures for safeguarding Service Users in line with best practice
5	There is evidence that Service Users have a meaningful voice, choice and control over how the support service is delivered	When appropriate, there is evidence to demonstrate that good moving and handling	Supervision and appraisals		

		techniques are being practiced			
6	At all times, personal identity is appropriately promoted and maintained in the scheme	Service Users are supported and encouraged to have appropriate rest and sleep	Recruitment and selection meets the requirement of the contract and is specific to the needs of each person supported		
7	Dignity and respect is maintained at all times	How well the service supports Service Users to meet the National Wellbeing Statement is understood by the Provider	Staff feel well supported by management and terms of employment for staff are considered good by the sector		
8	There is clear evidence that the views of Service Users, family members and others shape future provision and drive service improvement. A wide range of sources are used to strengthen the quality of the service.				

Specialist					
Progression and Recovery Module	The service delivered is strengthened to support Service Users to make positive life choices			When required, the progression or recovery model adopted works well and there is clear evidence of increasing independence towards more independent living	
Complex Disability				The service delivered is strengthened to support those Service Users who may be considered to have complex needs	The Provider has systems and processes in place that monitors and reduces restrictive practice and there is clear evidence this is working.

SUPPORTED LIVING MONITORING TOOL – APRIL 2019

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Measure Number	Measure	Fully Met		Partially Met	Not Met	Comments/Suggested Improvements
	Domain A – Relationships, Engagement and Quality of Life					
1	New Service Users and their close relatives are assisted with transition and resettlement					
a	The Provider has transition plans in place, evidencing engagement with Service Users and families.					
b	There is evidence of inclusion with tenancy and household related tasks.					
2	Delivering support to the needs and wishes of Service Users					
a	The Provider supports Service Users with Independence, supporting with daily living tasks, tenancy and achieving long and short term personal goals.					
b	Where appropriate, the Provider fosters a culture of 'doing with' as opposed to 'doing for'					
c	The Provider is delivering support in a timely and proactive way.					
d	The Provider uses equipment/aids/ including specialist equipment when appropriate to do so.					

e	The Provider supports Service Users to manage money in accordance with best practice.					
3	The Provider helps ensure that Service Users have a rich and varied range of activities/interests and engage appropriately with friends, family members and the community at large.					
a	There is evidence to demonstrate that the Provider is appropriately supporting Service Users to engage with their network of friends, family members, staff and the community at large.					
b	When appropriate to do so, there is evidence that the Provider has encouraged Service Users, when appropriate, to seek voluntary or paid employment work					
c	There is evidence to demonstrate that the Provider supports Service Users to engage with the community.					
4	There is a real sense of community in the Scheme					
a	The Provider is ensuring that each Service User feels they belong in the Scheme					
5	There is evidence that Service Users have a meaningful voice, choice and control over how the support service is delivered					
a	Service Users are fully involved and informed about the choices that affect them both in and out of the home.					

b	If appropriate, the Provider has explained to the Service User or their family members the right to independent advocacy.					
c	There's evidence in each scheme that supports the view that the provider is clear on whether advocacy support would be required for each individual, and if so, what form would that take, and by whom. This should, as an example, take the form of an assessment.					
d	This is clearly written in the care planning documentation, including when, broadly, advocacy should be sought					
e	At times when it was reasonably required, there is evidence to demonstrate that advocacy has been used by the individual					
6	At all times, personal identity is appropriately promoted and maintained in the scheme					
a	The Provider ensures that Service Users are treated as unique Service Users which takes into account their values and cultures.					

b	Staff have good knowledge of Service Users; including likes and dislikes and personal interests.					
7	Dignity and Respect is maintained at all times					
a	Management and staff maintain professional boundaries with Service Users and are engaging with Service Users, friends, family members and others in the Scheme in a way that would be considered appropriate.					
b	At all times care and support is delivered in a way that is considered dignified and respectful					
c	Staff are observed engaging with Service Users in a respectful and dignified manner.					
8	There is clear evidence that the views of service users, family members and others shape future provision and drive service improvement. A wide range of sources are used to strengthen the quality of the service.					
	There is evidence to demonstrate that the Provider is <u>systematically</u> engaging with service users, their representatives, commissioners, staff					

	and others to shape service improvement.					
	There is evidence that service improvement has been made following feedback.					
Domain B – Health and Wellbeing						
1		A healthy lifestyle is always promoted in the scheme				
a	Service Users are supported with personal care if required and personal care is positively promoted within the Scheme.					
b	The Provider is adequately supporting or encouraging Service Users with cleanliness of personal living areas.					
c	The Provider supports Service Users to make healthy lifestyle choices.					
d	There is evidence to suggest that the Provider consults with relevant professionals with special dietary requirements when required (e.g. SALT team) in accordance with needs					
2		Service Users have access to the full range of healthcare services and the staff team appropriately engages with social care and health professionals when appropriate				

a	There is evidence in care planning documentation and elsewhere that the Provider is appropriately supporting or acting on behalf of Service Users so they are maintaining full access to the range of healthcare services including the GP and Dentist open to them.					
b	There is evidence to demonstrate that Staff are always proactive in seeking help when required, and there are clear procedures in place on what to do should the need arise.					
c	There is a hospital passport in place for Service Users to be able to supply any necessary information quickly to hospital staff.					
d	There is evidence to demonstrate that the Provider notifies the Council, Health or others should the needs of the Service User change.					
3		Good nutrition, hydration is maintained and service users share a positive dining experience in the Scheme. Service Users are appropriately supported according to best practice.				
a	The Provider appropriately supports Service Users to purchase food and drink in accordance with their preferences.					

b	Service Users are supported to prepare and serve their own meals, drinks and snacks or if appropriate, meals drinks and snacks are afforded to them as required so as to maintain their good nutrition and hydration.					
c	There is evidence that special dietary needs are appropriately supported in the Scheme and feature in care planning documentation.					
d	There is a sense of community when people get together around mealtimes and, where possible, tasks are shared.					
4		Medication is managed according to best practice				
a	Service Users are supported to take medication in accordance with best practice.					
b	Records such as MAR Charts are correctly completed and should there be errors, these are appropriately identified, followed up or reported as appropriate.					

c	Staff who support Service Users with medication are fully trained and the training is updated according to the contract.					
d	Medication is appropriately stored					
E	When appropriate, there is evidence to demonstrate that good moving and handling practices are being practiced.					
f	Service Users are supported and encouraged to have appropriate rest and sleep					
5		When appropriate there is evidence to demonstrate that good moving and handling practices are being practiced.				
a	When moving and handling is observed, the practice is undertaken in accordance with best practice					
b	When appropriate, moving and handling features in care planning documentation in a way consistent with best practice (e.g. detailed risk assessments in place).					

c	Staff are trained in a way consistent with contract, and should it be required this training in renewed at least every three years.					
6	Service Users are supported and encouraged to have appropriate rest and sleep					
a	There is evidence that the Provider encourages service users to have appropriate amounts of rest and sleep.					
b	Staff continue to encourage service users to do so in instances when appropriate rest and sleep doesn't happen.					
7	How well the service supports Service Users to meet the National Wellbeing Statement is understood by the provider					
	In the context of each Service User, staff, including managers and seniors understand the importance of leading a healthy, independent lifestyle and					

	their role in how they can achieve this.					
	Domain C – Leadership, Management and staff					
1	Good leadership and management is present which filters down to operational staff.					
a	Upper and middle management show appropriate support to operational (scheme) managers - this could be in the form of monthly team meetings, including appropriate agenda's and content and 1 to 1 sessions.					
b	Middle managers visit services regularly and offer appropriate 'hands on' guidance and support to scheme managers.					
2	There is a culture among the management and staff that promotes quality and continuous improvement					
	Systems and process from the top down focus on quality and continual improvement.					
	Regular quality reviews are in place for each Scheme which link to best practice.					

3		There is an effective rota management process that allocates resources to maximise opportunities for everyone supported.				
a	Sample rotas show that the Scheme is appropriately staffed.					
b	Efforts are made to keep use of agency staff to a minimum and agency staff used have appropriate training.					
c	There is evidence that staff are changed as little as possible					
d	Staff sickness is appropriately managed.					
4		Staff Induction and Training meets the requirement of the contract and is specific to the needs of each person supported				
a	New staff members complete an induction program within first three months of employment consistent with Regulations.					
b	The Provider has a systematic way of recording the training staff have					

	received and to forward plan training in accordance with the requirements of the service specification and to meet Service User need.					
c	Staff are being trained according to contract requirements and are being highlighted for refresher training as appropriate.					
d	There is evidence of face to face training in addition to online for Mandatory training including Safeguarding.					
e	The Provider shows evidence of supporting staff to achieve NVQ/QCF					
f	There is appropriate handover between shifts that is sufficiently robust to safeguard Service Users and Staff					
g	Staff and management have staff meetings at least once a month, and these are recorded/minuted.					
5		Supervision and Appraisals				

a	There is evidence that all staff have received a 1 to 1 supervision at least once every 3 months.					
b	There is documentary evidence on Service User staff files that the management team have monitored and assessed a member of staff's competency, knowledge and performance.					
c	There is written evidence that all staff have received an appraisal in the last 12 months, and appraisals identify the training required by staff for the coming 12 month period.					
6		Recruitment and Selection meets the requirement of the contract and is specific to the needs of each person supported				
a	There is clear governance from the top down on staff recruitment and there is evidence that good decisions have been made at interview or thereafter.					
b	Staff files contain information according to regulations.					
c	Recruitment of staff who do not satisfy policy standards are clearly risk					

	assessed and have transparent approval.					
d	Records demonstrate that the provider asks staff to self-declare convictions on a yearly basis and any appropriate disclosures are risk assessed and actions implemented appropriately.					
7	There is a culture among the management and staff that promotes quality and continuous improvement.					
a	There is a clear process in place which is being followed around how the provider benchmarks itself against standards.					
b	There is ample evidence that identified changes are followed through as service changes					
8	Staff feel well supported by management and terms of employment for staff are considered good by the sector					
a	From what is known about staff employment conditions, the package of support by management is considered good.					

b	Regular staff meetings and supported by appropriate 1 to 1 sessions.					
c	Staff feedback on the Provider is positive					
Domain D – Care and Support Planning and Governance						
1		Care planning documentation are presented in line with best practice				
a	There is an up to date Care Managers Care Plan present for each Service User.					
b	Care and Support documentation is correctly presented, structured and have been reviewed according to regulations.					
c	There are appropriate risk assessments in place and they are considered robust, detailed, completed according to best practice and regularly reviewed.					
d	Daily records are regularly completed and issues taken forward as part of the					

	review process. Incidents are identified and progressed.					
e	Care planning documentation is regularly audited and updated if/when the needs of the Service Users change.					
f	Records relating to consulting with professionals are clear, detailed and contain clear evidence of any decisions and/or actions made.					
2		Support hours are well managed and the hours apportioned to each Service User are clear				
a	The Provider has a clear view of the hours apportioned to each Service User, including shared hours.					
b	The Provider has records that are clear and able to identify delivery of hours and these are fed back to commissioners, as appropriate.					
c	The provider can demonstrate that commissioned hours have been delivered.					

3		<p>The provider structures a process that works well to maximise independence and includes other fundamentals under the Wellbeing Act such as maintaining appropriate choice and control</p>				
a	<p>Care planning documents include person-centred goals and planning relevant to the Service User</p>					
b	<p>There is sufficient evidence in the Service User’s daily activities/routines that supports the view that the provider delivers support that fosters :</p> <ul style="list-style-type: none"> • Optimal independence; • Greater choice; • Appropriate control; • Other rights embedded in the Act; <p>In accordance with the founding principles of the Act.</p>					
c						
4		<p>Behaviour Observation Charts or similar are used to good effect to manage behaviours.</p>				

	Domain E – Health and Safety, the Environment and Safeguarding					
1		The property is clean and maintained to a good standard				
a	The scheme is maintained to a clean standard.					
b	There is a schedule in place for cleaning the building, including communal areas and evidence that this is being followed.					
c	The Scheme internally and externally appears to be in a good state of repair.					
d	The scheme maintains the garden and outside areas to a sufficiently high standard.					
e	The property has/is: <ul style="list-style-type: none"> • Adequately lit; • Appropriately heated and ventilated; • Rooms are appropriate to the needs of Service Users; 					

	<ul style="list-style-type: none"> • Adequate security in place; • Suitably furnished and equipped; • Window restrictors and hot water temperature restrictors are in place 					
2	The provider complies with the requirements of H&S standards					
a	Staff are aware of their responsibility in maintaining a 'safe environment'.					
b	The Provider has a robust approach to the reporting, recording, investigating and planning to manage risk in order to reduce the reoccurrence of known risks.					
c	The Provider follows statutory guidance to ensure that all equipment and aids required for the safe delivery of support for service users is available and in good working order.					
d	There are no visible risks such as trailing leads or other hazards such as, for example, trip hazards visible in the scheme.					
e	There is an up to date risk assessment in place in the event of a fire, fire evacuation plans are in place and have					

	been tested and fire equipment such as fire extinguishers, fire doors etc. are serviced according to regulations.					
f	Contingency plans are in place in the event of for example, a fire, flood, or adverse weather.					
g	Health and Safety records including for example records around COSHH, environmental risk assessments and others are updated and in place.					
3	Service Users are supported to comply with the terms of their tenancy					
a	A signed copy of the tenancy agreement is on file and is considered appropriate for the individual.					
b	There is evidence that rent and / or service charges are paid (either directly by tenant or via Housing Benefit)					
c	Only when appropriate, there is evidence of independent living skills					

	being developed e.g. cooking, cleaning, washing					
d	There is evidence of liaising with Housing Officer / landlord in respect of anti-social behaviour / other breach of tenancy and there is evidence that the tenant is supported to report repairs.					
e	There is evidence that the monetary contributions tenants make to the running of the scheme, for example, for new furniture, maintenance etc. is well managed and periodically audited/reconciled to spend.					
4	The Provider implements a policy for Safeguarding individuals in line with best practice					
a	There is a POVA Log in place and being used.					
b	There is evidence that Staff are aware of their duties in reporting any concerns around safeguarding individuals					

c	There is evidence that staff are reporting instances of concerns around Safeguarding and forwarding Regulation 28 or 60 Notices, as required					
d	Incident and daily records bear out that all incidents that should have been reported under Safeguarding or under Regulation 28/60 are appropriately reported.					
e	There is a whistle-blowing policy in place which is kept updated in line with best practice.					
f	There is evidence that the whistleblowing policy forms a part of induction and staff are regularly reminded of the policy					
g	There is a clear process in place should a staff member wish to whistle-blow that would support the individual in the way that would be appropriate					
h	If it has been used, has the whistleblowing process worked well and if not, have lessons been learned					
i	It is believed that the schemes culture is healthy enough so as to not form a barrier to whistleblowing					

	Specialist					
Complex Disability	Positive Behaviour Support Plans are included, kept up to date and identify likely complex behaviours (triggers) and includes guidance on how to support complex behaviours.					
Progression	If appropriate, there is a care planning document which plans out the Service User's path to independence, including interim goals and timescales, and structured in SMART format.					

CONSULTATION REPORT

LEARNING DISABILITY AND MENTAL HEALTH QUALITY ASSURANCE FRAMEWORK FOR THE PROVISION OF SUPPORTED LIVING SERVICES IN THE NEATH PORT TALBOT UNITARY AUTHORITY AREA

1.0 Background

- 1.1 On the 1st April 2021 the Social Care, Health and Well-being Cabinet Board authorised officers to consult members of the public and other stakeholders for 90 days on the Learning Disability and Mental Health Quality Assurance Framework (QAF).
- 1.2 For some time the Social Services Health and Housing Directorate has been modernising its commissioned service models and how social care works on a practical level. This modernisation agenda includes how well commissioned services work in practice and how it meets the needs of those having support.
- 1.2 To strengthen a revised supported living service model, a Quality Assurance Framework (QAF) was developed that could help inform providers and others on how well modern service support meets the founding principles of the Social Services and Wellbeing (Wales) Act 2014 and the Regulation and Inspection of Social Care Wales Act (RISCA). The QAF serves to agree what is important in supported living and will be used by stakeholders as a way of benchmarking how well commissioned service providers deliver support in accordance what is considered best practice in Wales.
- 1.3 The aim of the QAF is to:
 - Benchmark services so that commissioners, service providers and other stakeholders can identify how well services meet the personal outcomes of those having support.
 - Encourage continuous improvement and alignment to best practice in supported living services
 - Help identify changes that would make it easier for providers to enable service users to achieve their personal outcomes
 - Encourage more collaborative working with providers, service users, their family and others so a multi-faceted view of 'quality' and what is important to those that require services may be obtained

- To have a clear sense of what ‘quality’ means in practical terms in operational services

1.4 The QAF went out for public 90 day consultation from the 27th of July 2021 and closed the 19th of September 2021

2.0 Introduction

2.1 A range of engagement and consultation activities have taken place to help inform the QAF, including -

- Online consultation via the Council’s public consultation page
- Direct engagement with service users, family members and service providers and their staff
- Formal written contact with stakeholders

3.0 Consultation Objectives

- To provide a mechanism for people to contribute their views
- To find out if people agree or disagree with the draft QAF and the reasons for this
- To provide a mechanism for people to make comments and suggested changes to the Framework
- To ensure that the consultation was available to as many stakeholders as possible
- To ensure that the consultation was available in a format so people could understand

4.0 Overarching public consultation – Methodology

4.1 To help ensure that the consultation was circulated as widely as possible, respondents could submit their views by four mechanisms:

- **Online** - a self-completion questionnaire was published on the Council’s website. Respondents were asked to indicate whether they were a service user, family member or staff member of a provider of a supported living scheme. The questionnaire went live from the 27th of July 2021.

- **Paper copies of Questionnaires on contact** - consultation packs were made available that could be posted on request. The questionnaire packs contained a hard copy of the online version and responses were entered into 'SNAP' (our online consultation software package) for analysis. The available packs contained the following documents –
 - a) Introductory letter in Welsh and English that introduces the QAF, what it does and how to offer feedback – three versions, one for Service Users, the second for family members and the third for service providers.
 - b) Welsh and English versions of the Draft consultation document including an 'easy read' version in both languages.
 - c) Welsh and English versions of the questionnaire itself so that respondents could complete and return

- **Electronic copies of Questionnaires on contact** - The email address ccu@npt.gov.uk was promoted for people who wanted to request electronic versions of the documents above and to respond via this mechanism.

- **Live engagement sessions** arranged via Microsoft Teams at set times so that those participating could engage directly with Council officers involved in drawing up the QAF, where discussion was encouraged and feedback was obtained. Three separate sessions were arranged, one for family members on the 27th of July 2021 at 11am, one for service users on the 27th of July 2021 at 2pm and one for staff of service providers on the 29th of July 2021 at 11am.

4.2 The consultation was promoted via –

- The Council website homepage – via the Council's public consultation page – Snap Surveys <https://wh.snapsurveys.com/s.asp?k=161961461251>
- The Council's newsletter - 'NPT News'
- Letters and emails directly to service providers and to family members whose details were kept with the appropriate social worker teams

- Letters and emails passed to service providers asking them to pass to service users and to help support them to give feedback.
- Tabled as an item at the relevant Provider Forums to encourage Providers to provide feedback and support service users to provide feedback

5.0 Overarching Public Consultation – Responses

A total of one completed questionnaire was received through the online portal (from a staff member of a service provider), no hard copy returns were received and two family members were engaged with as part of the live consultations. The live consultations were minuted. Also officers received one written letter of response from a member of the public.

6.0 How the respondents feel about the proposals

6.1 Family members – Live session arranged for the 27th of July 2011, 11am (two people attended, one person from two different families of service users)

Family members were very complimentary of the QAF, what it aims to do and felt the Framework was overwhelmingly a positive thing. As far as improvements, it was felt that advocacy should be expanded on in the document as everyone recognised that advocacy is crucial to people who may experience challenges communicating and/or may be complex. The other areas which it was felt could be expanded on was whistleblowing and property maintenance, where again it was acknowledged that getting these right will make a huge difference to people's lives.

6.2 The Staff Member – staff member had scheduled to attend the live event but given pressures couldn't make it on the day, so they gave online written feedback instead, below (point 6.3).

6.3 Online feedback stated that the staff member felt the QAF was good, understood the reason for having it and also felt it would, when used, help positively to raise quality in services. They were very complimentary of the work. The only feedback that was given was an observation that the QAF didn't always align with CIW statutory regulations.

Note – given the feedback we felt it important to engage directly with the staff member so a meeting was arranged. During the meeting

the staff member was again very complimentary but stated there were a few places where the QAF didn't align to Statutory Regulations. Officers fed back to the staff member that the QAF aligns to our Contract and not with Statutory Regulations so there may be occasions where the Council may want something over and above the Statutory Regulations in our service models. The staff member noted the distinction and understood the difference. The Council thanked the staff member for their feedback.

- 6.4 Written Feedback - One written feedback posted directly to the team that raised a number of valuable observations on the QAF and how it could potentially be improved. The feedback and Council response is highlighted in Section 7.3 of this report.

7.0 Council's response to the consultation

7.1 Online feedback – 1 respondent

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Comments or questions raised on SNAP Survey and formal responses		
To what extent do you agree or disagree with the draft QAF?		
Number	Comment:	Council response:
1	Strongly agree (100%)	No response required
Does the draft QAF cover the areas that are most important to service users and their families?		
2	Strongly agree (100%)	No response required
Are there any areas that the draft QAF does not cover that you think needs to be included?		
3	No (100%)	No response required
Are there any areas in the draft QAF that you feel should not be included? Please tick one box only		
4	No (100%)	No response required

Do you think that the draft QAF would have a positive or negative impact on service users?		
5	Positive (100%)	No response required
What impact do you think the draft QAF will have on providers of services?		
6	Positive (100%)	No response required
Do you think the draft QAF will help commissioners and providers understand the impact of services on service users?		
7	Yes (100%)	No response required
Do you think that the draft QAF will help us identify changes that would make it easier for providers to enable service users to achieve their personal outcomes?		
8	Yes (100%)	No response required
Do you think the draft QAF will help improve the quality of services?		
9	Yes (100%)	No response required
Do you think that the draft QAF will encourage more collaborative working with		

commissioners, providers, service users and families?		
10	Yes (100%)	No response required
What impact do you think the draft QAF will have on the Council's socio economic duty?		
11	Don't know (100%)	No response required
What changes to the draft QAF do you think can be made to further improve the Council's socio economic duty?		
12	Some of the items included are different to that of the RISCA Regulations we work in line with under CIW registration so i feel it would be good for all items to link in, as an example team meetings for staff being held monthly, RISCA regs state Bi-monthly.	The QAF is embedded in our Contract with our service providers and not RISCA, though it's recognised that RISCA features heavily in the Contract. For various reasons there will be occasions when our authority would wish to have in place standards that may be above the requirements of RISCA.
What impact do you think the draft QAF may have on people's ability to use the Welsh language?		
13	Don't know (100%)	No response required.
What impact do you think the draft QAF might have on people because of their protected characteristics of: *age *disability *gender reassignment *marriage and civil partnership *pregnancy and maternity *race *religion or belief *sex *sexual orientation		

14	Don't know (100%)	No response required
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Please note that equalities information was gathered but due to the low submission rate, it has not been included in this report as the respondents could be identifiable. Information from this has informed the updated Impact Assessment.

7.2 Live event – Family Members – 2 respondents

Does the draft Quality Framework cover the areas that are most important to service users and family members?		
1	The Framework looks detailed on paper but needs to be more detailed, and one of those most important areas is Advocacy	The following additional elements will feature in the final version of the Framework – A5 (c) to (e)
2	Whistleblowing needs to be encouraged and noted it was missing in the document.	The following additional elements will feature in the final version of the Framework - E4(e) to (i)
3	More around property maintenance should be included in the Framework	The following additional elements will feature in the final version of the Framework – E1(d), (e), E3 (e)
Is there anything not covered?		
4	The areas mentioned previously.	Council's response – as above.

Is there anything that you feel should not be included?		
5	Nothing, aside from the above the Framework looks comprehensive	Council's response – the Council welcomes the feedback
Do you think the Framework will have a positive or negative impact?		
6	It will be positive if the contents are followed through, often there is a lack of communication between some Organisations and the people on the ground. Some Organisations will have their own set of rules. I don't want another report that just sits on the shelf	Council's response – reports are used by the Council to work collaboratively to change services, and any recommendations from reports are always taken forward with the service provider.
Do you think that applying the Framework would help improve the quality of services?		
7	The response was 'yes' but noted they have been involved with the NPT Council for many years, they know who to go to but not everyone does and channels need to be open.	Council response – although not specific to this QAF and is a more general observation, officers will look at how to further strengthen co-production and communication. The directorate now has an engagement team
8	People who are nonverbal or have complex needs must not be forgotten.	Council's response – we are constantly reviewing how to improve consultation and communication with those that use services and may have barriers to engagement. The directorate now has an engagement team to support with engagement activities and strategies. Within the context of this exercise, Providers were asked to support service users and easy read versions were provided.
9	Emphasised no parent wants their child to be looked after, they want them to be healthy, wise and living in the community but unfortunately in these circumstances	Council's response – the purpose of this QAF is to strengthen monitoring arrangements to ensure we commission the best quality services

	they have to depend on the Council and other services to care for them but someone needs to take responsibility for ensuring they are receiving the right care	
Any other comments, suggestions or questions?		
10	None	No response required

7.3 Written response direct to Council officers – 1 respondent.

Feedback via letter – one respondent		
	Respondents Comment	Council's Response
1	<p>“merely having access to the full range of healthcare services..” it is not sufficient; for severely impaired service users, it may be necessary to ensure regular health checks are being undertaken with responsibility for initiating such important action clearly stipulated (Sub-domain 2a and 2b).</p> <p>Similarly records relating to professional consultations are kept (including, where possible, any resulting actions) and, where available, relevant correspondence maintained to provide a clear record for the individual. It</p>	<p>Thank you for feedback, the Council recognises an:</p> <p>Adjusted measure B2(a) New Measure D1(f)</p>

	is less than clear whether these important aspects are fully covered by Sub-Domain 2c	
2	Sub-Domain 3(b) does not really address the situation, referred to in general section 1.2 above, for those who are unable to prepare.....their own meals, or even snacks (as defined).	Thank you for feedback, the Council recognises a: New measure B3(b)
3	The express emphasis placed on “maximising independence” and actions that would help support “greater or optimum independence” Sub-Domain 3b whilst compatible with part of the Act’s requirement – seems to reflect little regard for other important elements of the Act’s fundamental duty to promote, and definition of, wellbeing – as briefly referred to in General section 1.1 of this note or the reality of the situation for some severely impaired service users.	Thank you for feedback, the Council recognises an: Domain D3 title changed D3(b) new measure
4		Thank you for feedback, the Council recognises that

	<p>Sub-Domain 1&2 attempt to address aspects of property environment such as cleanliness and visible risks/hazards. However these provisions do not appear to be as comprehensive as those contained in, for example, Regulation 44 of the Regulated Services (Service Providers and Responsible Individuals (Wales) Regulations 2017, as amended). An extract is attached for ease of reference. It is regrettable that these Sub-Domains do not, among other things, 1) ensure that premises is adequately lit, heated and ventilated, 2) look at issues of size and nature and suitability of room available for the service users use 3) consider security arrangements.</p>	<p>although the full requirement of Regulation 44 and similar regulations around 'cleanliness' and 'risks/hazards' would fall under Care Inspectorate Wales monitoring, the Council has considered the comment on its merit and has included further measures in a new measure E1(e) in the final document.</p>
5	<p>Learning disability service users, especially those with severe/profound intellectual impairments are among the most vulnerable in society. The qualitative standard adopted, in this context should, surely, be accorded no less a level of importance, and equate with that stipulated by Regulation 44 in its entirety.</p>	<p>Thank you for feedback, although the Council understands the view taken, we would wish to advise that Care Inspectorate Wales may review the provider against the full requirement of Regulation 44 and our Council is only one of a number of organisations that would have a view of standards delivered in supported living. The Council and CIW work extensively together to have a more rounded view of quality in schemes. The QAF is not intended to replace or duplicate the CIW</p>

		inspection of providers against the Regulations, including Regulation 44.
6	Sub-Domain 2c refers to provider compliance with Statutory Guidance. Is this intended to cover, among other things, Regulation 57 of the Regulated Services (Service Providers and Responsible Individuals) (Wales) Regulations 2017 as amended? If so, the quality measures within this sub-domain might usefully be expanded with specific standards on “required safe water temperatures, safe storage and preparation of food, fitting window restrictors” – given their importance	The Council values the feedback and acknowledges that some of the more significant areas of this regulation has now featured in a new measure in E1(e). We note however that some elements of the feedback would reasonably fall under the Council’s Environmental Health and would not consequently form a part of this Framework, though it’s right to say does form a part of the contract. The commissioning department have close links with the Environmental Health team in order to obtain a holistic view of quality.
7	It is noted that Sub-Domain 3a requires signed copy of the ‘tenancy agreement’ to be on file; but is silent about whether such document does/not reflect the reality of circumstances surrounding the severely impaired service user’s actual occupation.	Thank you for feedback, the Council recognises the feedback and we refer you to revised measure E3(a)
8	With regard to Sub-Domain 3c – I would respectfully refer to my comments in general section 1.2 above.	Thank you for feedback, the Council recognises the feedback and we refer you to a revised measure E3(c)
9	It is presently unclear whether the term ‘complex needs’ is intended to cover within the QAF’s cross cutting	The decision on whether a person could be regarded as ‘complex’ would be agreed on a case by case basis

	<p>theme (QAF pages 4,9 and 29) entitled 'Complex Disability'. It is noted that pages 4 & 9 contain a brief reference to strengthening the service for these with "complex needs" – but does not say how or what is covered by this term. Page 29 does refer to the development of a Positive Behaviour Support Plans and guidance on complex behaviours – if those are the parameters intended by the term.</p>	<p>with Care Management as the Council recognises that there is no hard and fast rule for defining 'complex'</p>
10	<p>It is not clear what, if any, is the minimum frequency with which NPT Contract Monitoring will visit supported living schemes – to review/ensure compliance with the final QAF adopted for this area of care and support provision. Without clarification of the matter, it is difficult to see how reliance can be placed on a future QAF being properly implemented and followed.</p>	<p>The Council's Contract Monitoring team aims to visit all supported living schemes at least yearly, or more often if able to do so. The team will also respond to issues and concerns as they arise and may include an additional visit(s) if warranted. The Council is mindful that it is one of a number of organisations or teams that visits schemes and monitors services and it should note that the team works closely with its own social worker teams, CIW, Health and others who visit schemes and would respond to issues raised as appropriate.</p>
11	<p>...it is curious there is no express provision in Section 5 for the feedback of any contract monitoring report to those service users/families directly interested in the contract monitoring review of a supported living scheme.</p> <p>This situation appears contrary to the 'spirit if not letter' of the Council's stated wish for more "collaborative</p>	<p>The Council recognises the important contribution service users and family members play in giving a view on standards of care and support in schemes, however this recognition does not diminish the reality that there are issues discussed in the work of monitoring schemes which would be considered commercially sensitive and may also be person identifiable to the</p>

	working” and should be properly addressed in the final QAF.	collective family members of those service users in a scheme. CIW reports are available for public view, which will help public understand a provider’s compliance with the Regulations.
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Integrated Impact Assessment (IIA)

This Integrated Impact Assessment considers the duties and requirements of the following legislation in order to inform and ensure effective decision making and compliance:

- Equality Act 2010
- Welsh Language Standards (No.1) Regulations 2015
- Well-being of Future Generations (Wales) Act 2015
- Environment (Wales) Act 2016

Version Control

Version	Author	Job title	Date
Version 2	Chelé Zandra Howard	PO Commissioning	27.10.21

1. Details of the initiative

	Title of the Initiative: Quality Assurance Framework for Learning Disability & Mental Health Supported Living Services
1a	Service Area: Adult Services
1b	Directorate: Social Services, Health and Housing
1c	Summary of the initiative: The Quality Assurance Framework (QAF) sets out the criteria against which providers of supported living schemes for adults with learning disabilities and/or mental health conditions in Neath Port Talbot are assessed.
1d	Is this a 'strategic decision'? No
1e	Who will be directly affected by this initiative? Adults with learning disabilities and/or mental health conditions whose assessed needs can be met by supported living.
1f	When and how were people consulted? A 90 day consultation took place between 27th of July 2021 and the 19th of September 2021. This consultation involved, general public, people that use supported living services, families of people that use supported living services and providers

	of supported living providers. Full details of the consultation strategy and the outcome of the consultation can be found in the accompanying consultation report at Appendix 2 of the Cabinet report to which this Impact Assessment relates (date of report 9 th December 2021)
1g	<p>What were the outcomes of the consultation?</p> <p>The consultation report sets out in detail the outcomes of the report. A number of changes were made to the QAF in response to feedback. Overall respondents were positive about the QAF and there was no indication that the QAF would have adverse impacts on people with protected characteristics or on other considerations covered by this impact assessment.</p>

2. Evidence

What evidence was used in assessing the initiative?

Social Services routinely collects data as part of the assessment/review process of individuals which is reported to Welsh Government.

There are currently (Budget Team figures as at October 2021) 12 adults with mental health needs in supported living placements commissioned by Neath Port Talbot Council, while this figure is 146 for adults with learning disabilities.

The following summarises some of the information recorded about people with learning disabilities and mental health needs known to Social Services (note that not all data fields have been completed in all cases, and this relates to various services received):

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	People with learning disabilities				People with learning disabilities		
Age group	Female	Male	Total	Ethnicity	Female	Male	Total
20s	33	66	99	CHINESE		2	2
30s	33	44	77	OTHER		1	1
40s	25	25	50	OTHER MIXED		1	1
50s	28	21	49	WELSH	16	17	33
60s	21	23	44	WHITE BRITISH	136	163	299
70s	15	13	28	WHITE OTHER	1	1	2
80s	3		3	Not stated	5	7	12
Total	158	192	350	Total	158	192	350

Based on recorded data, those aged in their 20s represent the largest age group for people with learning disabilities, while 55% are male.

For people with mental health needs, those in their 50s represent the largest age group, with almost two-thirds (62%) of the total being male.

	People with mental health needs				People with mental health needs		
Age group	Female	Male	Total	Ethnicity	Female	Male	Total
40s	2		2				
50s	3	8	11	WELSH	3	2	5
60s	2	6	8	WHITE BRITISH	6	10	16
70s	1	4	5	Not stated	2	6	8
80s	1		1				
Total	11	18	29	Total	11	18	29

To provide geographical context, the following shows the wards where the clients reside:

Ward	People with learning disabilities	Ward	People with learning disabilities
ABERAVON	8	GWYNFI	4
ALLTWEN	3	LOWER BRYNAMMAN	4
BAGLAN	17	MARGAM	3
BLAENGWRACH	3	NEATH EAST	28
BRITON FERRY EAST	15	NEATH NORTH	10
BRITON FERRY WEST	12	NEATH SOUTH	14
BRYN AND CWMAVON	14	ONLLWYN	6
BRYN-COCH NORTH	4	PONTARDAWE	17
BRYN-COCH SOUTH	15	PORT TALBOT	9
CADOXTON	4	RESOLVEN	2
CIMLA	6	RHOS	9
COEDFFRANC CENTRAL	14	SANDFIELDS EAST	19
COEDFFRANC NORTH	2	SANDFIELDS WEST	12
COEDFFRANC WEST	8	SEVEN SISTERS	3
CRYNANT	3	SWANSEA	9
CWMLLYNFELL	1	TAI-BACH	23
CYMMER	3	TONNA	6
DYFFRYN	9	TREBANOS	7
GLYNCORRWG	4	UNKNOWN OUTSIDE NEATH PORT TALBOT	1
GLYNNEATH	7	Not stated	2
GODRE'R GRAIG	3	Total	350
GWAUN-CAE-GURWEN	7		

Ward	People with mental health needs
ABERAVON	4
COEDFFRANC WEST	1
DYFFRYN	2
GWAUN-CAE-GURWEN	1
MARGAM	1
NEATH EAST	3
NEATH NORTH	2
PONTARDAWE	1
PORT TALBOT	1
RESOLVEN	2
SANFIELDS EAST	1
SANFIELDS WEST	6
TAI-BACH	2
TREBANOS	1
YSTALYFERA	1
Total	29

- Western Bay Population Needs Assessment <http://www.westernbaypopulationassessment.org/en/learning/>
- Summary Statistics for South West Wales Region <https://gov.wales/sites/default/files/statistics-and-research/2020-05/summary-statistics-south-west-wales-region-2020-958.pdf>
- Daffodil data <http://www.daffodilcymru.org.uk/>
- Stats Wales <https://statswales.gov.wales/Catalogue/Population-and-Migration/Population/Estimates/Local-Authority/populationestimates-by-localauthority-year> and <https://statswales.wales.gov.uk/Catalogue/Equality-and-Diversity/Sexual-Identity/SexualIdentity-by-Area-IdentityStatus>
- ONS data from 2011 <https://www.ons.gov.uk/census>
- Results from consultation process

3. Equalities

a) How does the initiative impact on people who share a **protected characteristic**?

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Protected Characteristic	+	-	+/-	Why will it have this impact?
Age	x			<p>Those aged in their 20s represent the largest age group for people with learning disabilities. For people with mental health needs, those in their 50s represent the largest age group.</p> <p>Access to support services is unlikely to be solely due to a person's age. However, personal circumstances relating to a person's age may have an impact on how support is delivered or the level/type of support required. The aim of the QAF is to promote good practice and good quality service provision via routine monitoring against various criteria and measures.</p> <p>The purpose of the QAF is to:</p> <ul style="list-style-type: none"> • Benchmark services so that commissioners, service providers and others may better understand how well support is delivered relative to the outcomes agreed for service users • Encourage continuous improvement and best practice in supported living services • Help identify changes that would make it easier for providers to enable service users to achieve their personal outcomes • Encourage more collaborative working with providers, service users, their family and others so a multi-faceted view of 'quality' may be obtained • To have a clear sense of what quality means in practical terms in operational services <p>As such it should have a positive impact on people with a protected characteristic</p>
Disability	x			<p>Supported living is directly related to a person's assessed care and support needs due to a learning disability and/or mental health condition. The aim of the QAF is to</p>

			<p>promote good practice and good quality service provision via routine monitoring against various criteria and measures.</p> <p>The purpose of the QAF is to:</p> <ul style="list-style-type: none"> • Benchmark services so that commissioners, service providers and others may better understand how well support is delivered relative to the outcomes agreed for service users • Encourage continuous improvement and best practice in supported living services • Help identify changes that would make it easier for providers to enable service users to achieve their personal outcomes • Encourage more collaborative working with providers, service users, their family and others so a multi-faceted view of 'quality' may be obtained • To have a clear sense of what quality means in practical terms in operational services <p>As such it should have a positive impact on people with a protected characteristic</p>
Gender reassignment	x		<p>Access to support services is unlikely to be solely due to a person's gender identity. However, personal circumstances relating to a person's gender identity may have an impact on how support is delivered or the level/type of support required. The aim of the QAF is to promote good practice and good quality service provision via routine monitoring against various criteria and measures.</p> <p>The purpose of the QAF is to:</p> <ul style="list-style-type: none"> • Benchmark services so that commissioners, service providers and others may better understand how well support is delivered relative to the outcomes agreed for service users • Encourage continuous improvement and best practice in supported living services • Help identify changes that would make it easier for providers to enable service users to achieve their personal outcomes

			<ul style="list-style-type: none"> • Encourage more collaborative working with providers, service users, their family and others so a multi-faceted view of 'quality' may be obtained • To have a clear sense of what quality means in practical terms in operational services <p>As such it should have a positive impact on people with a protected characteristic</p>
Marriage & civil partnership	x		<p>It is possible that the cared for person may already be or get married, which would need to be taken into account when determining how to best meet any support needs. The aim of the QAF is to promote good practice and good quality service provision via routine monitoring against various criteria and measures.</p> <p>The purpose of the QAF is to:</p> <ul style="list-style-type: none"> • Benchmark services so that commissioners, service providers and others may better understand how well support is delivered relative to the outcomes agreed for service users • Encourage continuous improvement and best practice in supported living services • Help identify changes that would make it easier for providers to enable service users to achieve their personal outcomes • Encourage more collaborative working with providers, service users, their family and others so a multi-faceted view of 'quality' may be obtained • To have a clear sense of what quality means in practical terms in operational services <p>As such it should have a positive impact on people with a protected characteristic</p>
Pregnancy and maternity	x		<p>It is possible that the cared for person may become pregnant or have a young child, which would need to be taken into account when determining how to best meet any support needs. The aim of the QAF is to promote good practice and good quality service provision via routine monitoring against various criteria and measures.</p>

			<p>The purpose of the QAF is to:</p> <ul style="list-style-type: none"> • Benchmark services so that commissioners, service providers and others may better understand how well support is delivered relative to the outcomes agreed for service users • Encourage continuous improvement and best practice in supported living services • Help identify changes that would make it easier for providers to enable service users to achieve their personal outcomes • Encourage more collaborative working with providers, service users, their family and others so a multi-faceted view of 'quality' may be obtained • To have a clear sense of what quality means in practical terms in operational services <p>As such it should have a positive impact on people with a protected characteristic</p>
Race	x		<p>Access to support is unlikely to be solely due to a person's race. However, personal circumstances relating to a person's race may have an impact on how support is delivered or the level/type of support required. The aim of the QAF is to promote good practice and good quality service provision via routine monitoring against various criteria and measures.</p> <p>The purpose of the QAF is to:</p> <ul style="list-style-type: none"> • Benchmark services so that commissioners, service providers and others may better understand how well support is delivered relative to the outcomes agreed for service users • Encourage continuous improvement and best practice in supported living services • Help identify changes that would make it easier for providers to enable service users to achieve their personal outcomes • Encourage more collaborative working with providers, service users, their family and others so a multi-faceted view of 'quality' may be obtained

			<ul style="list-style-type: none"> To have a clear sense of what quality means in practical terms in operational services <p>As such it should have a positive impact on people with a protected characteristic</p>
Religion or belief	x		<p>Access to support is unlikely to be solely due to a person's religion or belief. However, personal circumstances relating to a person's religion or belief may have an impact on how support is delivered or the level/type of support required. The aim of the QAF is to promote good practice and good quality service provision via routine monitoring against various criteria and measures.</p> <p>The purpose of the QAF is to:</p> <ul style="list-style-type: none"> Benchmark services so that commissioners, service providers and others may better understand how well support is delivered relative to the outcomes agreed for service users Encourage continuous improvement and best practice in supported living services Help identify changes that would make it easier for providers to enable service users to achieve their personal outcomes Encourage more collaborative working with providers, service users, their family and others so a multi-faceted view of 'quality' may be obtained To have a clear sense of what quality means in practical terms in operational services <p>As such it should have a positive impact on people with a protected characteristic</p>
Sex	x		<p>Males represent the largest group for people with learning disabilities and mental ill health.</p> <p>Access to support is unlikely to be solely due to a person's sex. However, personal circumstances relating to a person's sex may have an impact on how support is delivered or the level/type of support required. The aim of the QAF is to promote</p>

			<p>good practice and good quality service provision via routine monitoring against various criteria and measures.</p> <p>The purpose of the QAF is to:</p> <ul style="list-style-type: none"> • Benchmark services so that commissioners, service providers and others may better understand how well support is delivered relative to the outcomes agreed for service users • Encourage continuous improvement and best practice in supported living services • Help identify changes that would make it easier for providers to enable service users to achieve their personal outcomes • Encourage more collaborative working with providers, service users, their family and others so a multi-faceted view of 'quality' may be obtained • To have a clear sense of what quality means in practical terms in operational services <p>As such it should have a positive impact on people with a protected characteristic</p>
Sexual orientation	x		<p>Access to support is unlikely to be solely due to a person's sexual orientation. However, personal circumstances relating to a person's sexual orientation may have an impact on how support is delivered or the level/type of support required. The aim of the QAF is to promote good practice and good quality service provision via routine monitoring against various criteria and measures.</p> <p>The purpose of the QAF is to:</p> <ul style="list-style-type: none"> • Benchmark services so that commissioners, service providers and others may better understand how well support is delivered relative to the outcomes agreed for service users • Encourage continuous improvement and best practice in supported living services • Help identify changes that would make it easier for providers to enable service users to achieve their personal outcomes

			<ul style="list-style-type: none"> • Encourage more collaborative working with providers, service users, their family and others so a multi-faceted view of 'quality' may be obtained • To have a clear sense of what quality means in practical terms in operational services <p>As such it should have a positive impact on people with a protected characteristic</p>
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What action will be taken to improve positive or mitigate negative impacts?
<p>The consultation process did not indicate that any further action needed to be undertaken to improve positive impacts or mitigate negative impacts.</p> <p>If on implementation of the QAF it is identified that there are opportunities to improve positive impacts or mitigate negative impacts then the QAF will be reviewed.</p>

b) How will the initiative assist or inhibit the ability to meet the **Public Sector Equality Duty**?

Public Sector Equality Duty (PSED)	+	-	+/-	Why will it have this impact?
To eliminate discrimination, harassment and victimisation	x			<p>One purpose of the QAF is to help identify changes that would make it easier for providers to enable service users to achieve and maintain greater independence and their individual outcomes. Supported living schemes are community based services that seek to improve people's independence as far as possible.</p> <p>A number themes and indicators within the tool supports PSRD, such as:</p>

				<ul style="list-style-type: none"> • There is evidence to demonstrate that the Provider is appropriately supporting Service Users to engage with their network of friends, family members, staff and the community at large. • When appropriate to do so, there is evidence that the Provider has encouraged Service Users, when appropriate, to seek voluntary or paid employment work • There is evidence to demonstrate that the Provider supports Service Users to engage with the community. <p>Therefore, the QAF will contribute positively towards the Council's PSED.</p>
To advance equality of opportunity between different groups	x			
To foster good relations between different groups	x			

What action will be taken to improve positive or mitigate negative impacts?

The consultation process did not indicate that any further action needed to be undertaken to improve positive impacts or mitigate negative impacts.

If on implementation of the QAF it is identified that there are opportunities to improve positive impacts or mitigate negative impacts then the QAF will be reviewed.

4. Socio Economic Duty

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Impact	Details of the impact/advantage/disadvantage
Positive/Advantage	<p>One purpose of the QAF is to help identify changes that would make it easier for providers to enable service users to achieve and maintain greater independence and their individual outcomes. Supported living schemes are community based services that seek to improve people's independence as far as possible.</p> <p>A number themes and indicators within the tool supports mitigation of socio-economic disadvantage such as:</p> <ul style="list-style-type: none"> • A healthy lifestyle is always promoted in the scheme • Service Users have access to the full range of healthcare services and the staff team appropriately engages with social care and health professionals when appropriate • The Provider helps ensure that Service Users have a rich and varied range of activities/interests and engage appropriately with friends, family members and the community at large • When appropriate to do so, there is evidence that the Provider has encouraged Service Users, when appropriate, to seek voluntary or paid employment work
Negative/Disadvantage	No negative impacts identified
Neutral	No neutral impacts identified

What action will be taken to reduce inequality of outcome

The consultation process did not indicate that any further action needed to be undertaken to improve positive impacts or mitigate negative impacts.

If on implementation of the QAF it is identified that there are opportunities to improve positive impacts or mitigate negative impacts then the QAF will be reviewed

5. Community Cohesion/Social Exclusion/Poverty

	+	-	+/-	Why will it have this impact?
Community Cohesion	x			<p>Supported living schemes are typically community based, therefore this type of support contributes to community cohesion, reduce social exclusion and reduce poverty</p> <p>A number themes and indicators within the tool supports this area, such as</p> <ul style="list-style-type: none"> • There is evidence to demonstrate that the Provider is appropriately supporting Service Users to engage with their network of friends, family members, staff and the community at large. • When appropriate to do so, there is evidence that the Provider has encouraged Service Users, when appropriate, to seek voluntary or paid employment work • There is evidence to demonstrate that the Provider supports Service Users to engage with the community.
Social Exclusion	x			
Poverty	x			

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What action will be taken to improve positive or mitigate negative impacts?

The consultation process did not indicate that any further action needed to be undertaken to improve positive impacts or mitigate negative impacts.

If on implementation for the QAF it is identified that there are opportunities to improve positive impacts or mitigate negative impacts then the QAF will be reviewed

6. Welsh

	+	-	+/-	Why will it have this effect?
What effect does the initiative have on: – people's opportunities to use the Welsh language			x	Will not have any impact on a person's ability to have a service in their language of choice. Contracts for commissioned services contain clauses to ensure the provider delivers services in line with the Welsh Language Act.
– treating the Welsh and English languages equally			x	Will not have any impact on a person's ability to have a service in their language of choice. Contracts for commissioned services contain clauses to ensure the provider delivers services in line with the Welsh Language Act.

What action will be taken to improve positive or mitigate negative impacts?

The consultation process did not indicate that any further action needed to be undertaken to improve positive impacts or mitigate negative impacts.

If on implementation for the QAF it is identified that there are opportunities to improve positive impacts or mitigate negative impacts then the QAF will be reviewed

7. Biodiversity

How will the initiative assist or inhibit the ability to meet the **Biodiversity Duty**?

Biodiversity Duty	+	-	+/-	Why will it have this impact?
To maintain and enhance biodiversity			x	Not applicable
To promote the resilience of ecosystems, i.e. supporting protection of the wider environment, such as air quality, flood alleviation, etc.			x	Not applicable
What action will be taken to improve positive or mitigate negative impacts?				
Not applicable				

8. Well-being of Future Generations

How have the five ways of working been applied in the development of the initiative?

Ways of Working	Details
i. Long term – looking at least 10 years (and up to 25 years) ahead	<p>This will help the long term wellbeing of people with learning disabilities and/or a mental health condition.</p> <p>A number of themes support this such as:</p> <ul style="list-style-type: none"> The Provider supports Service Users to make healthy lifestyle choices.

	<ul style="list-style-type: none"> The Provider supports Service Users with Independence, supporting with daily living tasks, tenancy and achieving long and short term personal goals.
ii. Prevention – preventing problems occurring or getting worse	<p>The QAF will provide a mechanism for monitoring the quality of service delivery in supported living schemes, and help to drive service improvements.</p> <p>A number of themes support this such as:</p> <ul style="list-style-type: none"> The Provider supports Service Users to make healthy lifestyle choices. There is evidence in care planning documentation and elsewhere that the Provider is appropriately supporting Service Users to maintain full access to the range of healthcare services including the GP and Dentist.
iii. Collaboration – working with other services internal or external	<p>The QAF will allow Social Services, Health and service providers to work together to ensure quality of service delivery is maintained/improved. The draft has been developed in partnership with SB UHB and providers of services</p> <p>There are a number of themes that support this such as:</p> <ul style="list-style-type: none"> There is evidence to suggest that the Provider consults with relevant professionals with special dietary requirements when required (e.g. SALT team) in accordance with needs There is evidence in care planning documentation and elsewhere that the Provider is appropriately supporting Service Users to maintain full access to the range of healthcare services including the GP and Dentist.
iv. Involvement – involving people, ensuring they reflect the diversity of the population	<p>This has been subject to a full 90 day consultation and feedback from this consultation has directly influenced the QAF, examples of additional measures added as a result of consultation include:</p> <ul style="list-style-type: none"> There's evidence in each scheme that supports the view that the provider is clear on whether advocacy support would be required for each individual, and if so, what form would that take, and by whom. This should, as an example, take the form of an assessment. The scheme maintains the garden and outside areas to a sufficiently high standard. A signed copy of the tenancy agreement is on file and is considered appropriate for the individual. <p>There are a number of themes that support this such as:</p>

	<ul style="list-style-type: none"> • There is evidence to demonstrate that the provider is systematically engaging with service users, their representatives, commissioners, staff and others to shape service improvement. • There is evidence that service improvement has been made following feedback
v. Integration – making connections to maximise contribution to:	<p>The QAF contributes towards the objective of improving the wellbeing of adults who live in the county borough.</p> <p>One of the objectives of this QAF is to:</p> <ul style="list-style-type: none"> • Encourage more collaborative working with providers, service users, their family and others so a multi-faceted view of ‘quality’ may be obtained
Council’s well-being objectives	<p>To improve the wellbeing of all adults who live in the county borough.</p> <p>There are a number of themes that support this such as:</p> <ul style="list-style-type: none"> • The Provider supports Service Users with Independence, supporting with daily living tasks, tenancy and achieving long and short term personal goals.
Other public bodies objectives	<p>Create safe, confident and resilient communities, focusing on vulnerable people. Encouraging Ageing Well.</p> <p>There are a number of themes that support this such as:</p> <ul style="list-style-type: none"> • There is evidence to demonstrate that the Provider supports Service Users to engage with the community.

9. Monitoring Arrangements

Provide information on the monitoring arrangements to:

Monitor the impact of the initiative on Equalities, Community Cohesion, the Welsh Measure, Biodiversity Duty and the Wellbeing Objectives.

If on implementation for the QAF it is identified that there are opportunities to improve positive impacts or mitigate negative impacts then the QAF will be reviewed

10. Assessment Conclusions

Please provide details of the conclusions reached in relation to each element of the assessment:

	Conclusion
Equalities	<p>Will have a positive impact on people with protected characteristic as the QAF will support the continuous improvement and best practice in supported living services and help identify changes that would make it easier for providers to enable service users to achieve their personal outcomes.</p> <p>The consultation process did not indicate that any further action needed to be undertaken to improve positive impacts or mitigate negative impacts.</p>
Socio Economic Disadvantage	<p>Will have a positive impact on mitigating socio-economic disadvantage as there are a number of themes that help positively improve socio-economic factors.</p> <p>The consultation process did not indicate that any further action needed to be undertaken to improve positive impacts or mitigate negative impacts.</p>
Community Cohesion/ Social Exclusion/Poverty	<p>Will have a positive impact on community cohesion, social exclusion and poverty as a number of themes that help positively impact on these areas.</p> <p>The consultation process did not indicate that any further action needed to be undertaken to improve positive impacts or mitigate negative impacts.</p>
Welsh	<p>Neutral impact as will not have any impact on a person's ability to have a service in their language of choice. Contracts for commissioned services contain clauses to ensure the provider delivers services in line with the Welsh Language Act.</p>
Biodiversity	<p>Not applicable</p>
Well-being of Future Generations	<p>This will have a positive impact on meeting the five ways of working under the Well-being of Future Generation Act as a number of themes that help positively impact on these areas.</p> <p>The consultation process did not indicate that any further action needed to be undertaken to improve positive impacts or mitigate negative impacts.</p>

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Overall Conclusion

Please indicate the conclusion reached:

- **Continue** - as planned as no problems and all opportunities have been maximised x
- **Make adjustments** - as potential problems/missed opportunities/negative impacts have been identified along with mitigating actions
- **Justification** - for continuing with the initiative even though there is a potential for negative impacts or missed opportunities
- **STOP** - redraft the initiative as actual or potential unlawful discrimination has been identified

Please provide details of the overall conclusion reached in relation to the initiative

The purpose of the QAF is to set out the criteria against which providers of supported living schemes for adults with learning disabilities and/or mental health conditions in Neath Port Talbot are assessed.

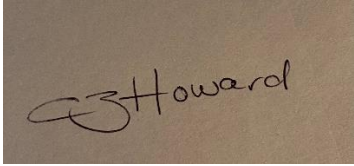
Feedback from the 90 day consultation has directly influenced the final version and this consultation did not indicate that any further action needed to be undertaken to improve positive impacts or mitigate negative impacts.

11. Actions

What actions are required in relation to obtaining further data/information, to reduce or remove negative impacts or improve positive impacts?

Action	Who will be responsible for seeing it is done?	When will it be done by?	How will we know we have achieved our objective?
As the QAF is implemented, complete further IIAs in respect of any emerging unintended/unforeseen impact and include them in annual monitoring reports to Members.	Andrew Budden	As required but at least annually	The overall impact of the strategy and action plan on all those unpaid carers receiving support remains positive

12. Sign off

	Name	Position	Signature	Date
Completed by	Chelé Zandra Howard	PO Commissioning		27.10.21
Signed off by	Angela Thomas	Head of Service	A.Thomas	27.10.21

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Social Care, Health and Wellbeing Cabinet Board

Immediately following Scrutiny Committees starting at 2pm

Meeting Date	Agenda Item	Type	Contact Officer
9 December	Quarter 2 2021/22 Quarterly Performance Report	Monitor	Shaun Davies
	Procurement of a Core and Cluster service	Decision	Chele Howard
	Procurement of residential respite for children and young people	Decision	Chele Howard
	Implementation of a Quality Framework for Monitoring Supported Living Services	Decision	Chele Howard
	Development of Independent Living Hub at Bspoked (Out to Consultation)	Decision	Sue Bradshaw/ Chele Howard
	Joint Inspection of Child Protection Arrangements (JICPA): Final Letter and Action Plan	Information	Andrew Jarrett/ Andrew Thomas Keri Warren/Chris Millis
	Lettings Policy Report	Decision	Robert Davies/ Angela Thomas

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Meeting Date	Agenda Item	Type	Contact Officer
20 th January 2022	Carers Partnership Annual Report	Monitor	Johanna Hall-Davies (johannad@nptcvs.org.uk)
	Removal of Means Tests for DFG Report	Decision	Robert Davies/ Angela Thoms
	Corporate Safeguarding Group Bi-annual report	Information	Chris Frey Davies
	Remodelling of Adult Social Care (Info following Consultation) (Moved from December meeting)	Information (confirmed by Angela Thomas in PO mtg on 13 July)	Angela Thomas

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3rd March	Quarter 3 2021/22 Quarterly Performance Report	Monitor	Shaun Davies
	Consultation on the Housing Support Strategy		Chele Howard
	Liberty Protection Safeguards Report	Information	Angela Thomas/ Chris Frey Davies

Mae'r dudalen hon yn fwiadol wag