

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	Hayley Short	Commissioning Officer	29/10/2024

1. Details of the initiative

	Title of the Initiative: Neath Port Talbot Council Children and Young People Services Placement Commissioning Strategy 2024-2027.
1a	Service Area: Children & Young People Services
1b	Directorate: Social Services, Health & Housing
1c	Summary of the initiative: The Placement Commissioning Strategy 2024-2027 (Appendix 1) sets out Neath Port Talbot Council's ('the Council') plans to deliver on placement sufficiency for Children and Young People and Welsh Governments Eliminate Profit Agenda.
1d	Is this a 'strategic decision'? Yes
1e	Who will be directly affected by this initiative? People aged up to 18+ who currently need social care and support; those who need care and support in the future; and their families and carers; NPT Children's Services staff; private service providers; third sector service providers.

1f	When and how were people consulted? Children and Young people will be consulted as part of individual initiatives highlighted in the Placement Commissioning Strategy 2024-2027.
1g	What were the outcomes of the consultation? Children and Young people will be consulted as part of individual initiatives highlighted in the Placement Commissioning Strategy 2024-2027.

2. Evidence

What evidence was used in assessing the initiative?
<ul style="list-style-type: none"> • West Glamorgan Regional Partnership Area Plan 2023-2027 • West Glamorgan Regional Partnership Population Needs Assessment 2022-2027 • West Glamorgan Regional Partnership Social Care Market Stability Report 2022 • NPTCBC Corporate Plan 2024-2027 • NPTCBC Children & Young People Social Care Strategic Plan 2023-2026 • NPTCBC Adult and Children’s Social Care Market Stability Report 2022 • NPTCBC Public Participation Strategy 2023-2027 • Association of Directors of Social Services (ADSS) Cymru, Eliminating Profit from the Care of Children who are looked after. Contribution to the Regulatory Impact Assessment March 2024 <p data-bbox="192 1106 772 1145">Eliminating Profit RIA Final .docx</p>

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>Children and young people receiving care and support do so as a result of their age and circumstances.</p> <p>The strategy sets out plans to deliver on placement sufficiency for Children and Young People and Welsh Governments Eliminate Profit Agenda, which will have a positive impact to children and young people requiring services.</p> <p>There are no changes to the eligibility criteria for any of the services.</p> <p>Providers of various services, both commissioned and in-house, develop care and support plans in conjunction with children, young people and families. This plan is person-centred and will take into account any specific requirements resulting from children's, young persons and families' protected characteristics to ensure that there is equality of outcomes.</p> <p>Contracts with commissioned providers have clauses relating to ensuring compliance with the relevant equalities legislation.</p> <p>In-house and Commissioned providers are required to implement monitoring systems, which will also help to identify if any aspect of the service has led to unintended/unidentified negative impacts on children and young people with a protected characteristic.</p> <p>The various services have monitoring systems in place to ensure that staff are adequately trained and meet relevant standards (e.g. for administration of medication, manual handling). Further monitoring systems are in place to ensure that the services delivered are of a good quality and meet children and young people's personal outcomes. These monitoring systems will also enable the services to identify whether</p>

			<p>there are unintended consequences which may impact on children, young people and families with a protected characteristic.</p> <p>The services will continue to be monitored by the CCU (which includes receiving staff and service user feedback) and the Unit will also analyse any complaints and safeguarding referrals relating to the services. This will ensure that the Council can identify if there are any concerns about services, including any unintended/unidentified negative impacts on children, young people and families with a protected characteristic.</p> <p>Providers and in-house services are contractually required to implement monitoring systems, which will also help to identify if any aspect of the services has led to unintended/unidentified negative impacts on people with a protected characteristic.</p> <p>The Placement Commissioning Strategy will be monitored to understand if its impact has positively improved outcomes for children, young people and families requiring social care and support. This will also help to identify any unintended/unidentified negative impacts on children, young people and families with a protected characteristic.</p>
Disability	X		<p>Children, young people and families receiving a care and support service may have a disability.</p> <p>The strategy sets out plans to deliver on placement sufficiency for Children and Young People and Welsh Governments Eliminate Profit Agenda, which will have a positive impact to children and young people requiring services.</p> <p>There are no changes to the eligibility criteria for any of the services.</p> <p>Providers of various services, both commissioned and in-house, develop care and support plans in conjunction with children, young people and families. This plan is</p>

			<p>person-centred and will take into account any specific requirements resulting from children's, young persons and families' protected characteristics to ensure that there is equality of outcomes.</p> <p>Contracts with commissioned providers have clauses relating to ensuring compliance with the relevant equalities legislation.</p> <p>In-house and Commissioned providers are required to implement monitoring systems, which will also help to identify if any aspect of the service has led to unintended/unidentified negative impacts on children and young people with a protected characteristic.</p> <p>The various services have monitoring systems in place to ensure that staff are adequately trained and meet relevant standards (e.g. for administration of medication, manual handling). Further monitoring systems are in place to ensure that the services delivered are of a good quality and meet children and young people's personal outcomes. These monitoring systems will also enable the services to identify whether there are unintended consequences which may impact on children, young people and families with a protected characteristic.</p> <p>The services will continue to be monitored by the CCU (which includes receiving staff and service user feedback) and the Unit will also analyse any complaints and safeguarding referrals relating to the services. This will ensure that the Council can identify if there are any concerns about services, including any unintended/unidentified negative impacts on children, young people and families with a protected characteristic.</p> <p>Providers are contractually required to implement monitoring systems, which will also help to identify if any aspect of the services has led to unintended/unidentified negative impacts on people with a protected characteristic.</p>
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Gender reassignment	X		<p>The services are delivered across all genders and gender identities. Staff employed by the providers will be from across the spectrum of genders and gender identities</p> <p>The strategy sets out plans to deliver on placement sufficiency for Children and Young People and Welsh Governments Eliminate Profit Agenda, which will have a positive impact to children and young people requiring services.</p> <p>There are no changes to the eligibility criteria for any of the services.</p> <p>Providers of various services, both commissioned and in-house, develop care and support plans in conjunction with children, young people and families. This plan is person-centred and will take into account any specific requirements resulting from children's, young persons and families' protected characteristics to ensure that there is equality of outcomes.</p> <p>Contracts with commissioned providers have clauses relating to ensuring compliance with the relevant equalities legislation.</p> <p>In-house and Commissioned providers are required to implement monitoring systems, which will also help to identify if any aspect of the service has led to unintended/unidentified negative impacts on children and young people with a protected characteristic.</p> <p>The various services have monitoring systems in place to ensure that staff are adequately trained and meet relevant standards (e.g. for administration of medication,</p>

			<p>manual handling). Further monitoring systems are in place to ensure that the services delivered are of a good quality and meet children and young people’s personal outcomes. These monitoring systems will also enable the services to identify whether there are unintended consequences which may impact on children, young people and families with a protected characteristic.</p> <p>The services will continue to be monitored by the CCU (which includes receiving staff and service user feedback) and the Unit will also analyse any complaints and safeguarding referrals relating to the services. This will ensure that the Council can identify if there are any concerns about services, including any unintended/unidentified negative impacts on children, young people and families with a protected characteristic.</p> <p>Providers are contractually required to implement monitoring systems, which will also help to identify if any aspect of the services has led to unintended/unidentified negative impacts on people with a protected characteristic.</p> <p>The Placement Commissioning Strategy will be monitored to understand if its impact has positively improved outcomes for children, young people and families requiring social care and support. This will also help to identify any unintended/unidentified negative impacts on children, young people and families with a protected characteristic.</p>
Marriage & civil partnership	X		<p>Staff that deliver the service may be married or in a civil partnership.</p> <p>The Placement Commissioning Strategy should have a positive impact as it aims to offer children, young people and families more personalised and outcome-focused services, which can help alleviate the strain of informal caring relationships, such as husband/wife caring for their children.</p>

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Pregnancy and maternity		X	<p>It is possible that people receiving care and support will have a protected characteristic due to their pregnancy/maternity status.</p> <p>Employees of the Council or providers may have a protected characteristic due to their pregnancy/maternity status.</p> <p>There are contractual clauses within the commissioned provider contracts and the Council's employment contracts relating to compliance with employment law.</p> <p>Staff recruitment will be in line with HR policies, process and all relevant legislation.</p> <p>The Placement Commissioning Strategy will be monitored to understand if its impact has positively improved outcomes for children, young people and families requiring social care and support. This will also help to identify any unintended/unidentified negative impacts on people with a protected characteristic.</p>

Race	X		<p>The services are delivered across all ethnic groups. Employees of providers may have a protected characteristic due to their race.</p> <p>The strategy sets out plans to deliver on placement sufficiency for Children and Young People and Welsh Governments Eliminate Profit Agenda, which will have a positive impact to children and young people requiring services.</p> <p>There are no changes to the eligibility criteria for any of the services.</p> <p>Providers of various services, both commissioned and in-house, develop care and support plans in conjunction with children, young people and families. This plan is person-centred and will take into account any specific requirements resulting from children's, young persons and families' protected characteristics to ensure that there is equality of outcomes.</p> <p>Contracts with commissioned providers have clauses relating to ensuring compliance with the relevant equalities legislation.</p> <p>In-house and Commissioned providers are required to implement monitoring systems, which will also help to identify if any aspect of the service has led to unintended/unidentified negative impacts on children and young people with a protected characteristic.</p> <p>The various services have monitoring systems in place to ensure that staff are adequately trained and meet relevant standards (e.g. for administration of medication, manual handling). Further monitoring systems are in place to ensure that the services delivered are of a good quality and meet children and young people's personal outcomes. These monitoring systems will also enable the services to identify whether there are unintended consequences which may impact on children, young people and families with a protected characteristic.</p>
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Religion or belief	X		<p>The services are delivered to children, young people and families across all religions/beliefs. Employees of providers may have a protected characteristic due to their religion/belief.</p> <p>The strategy sets out plans to deliver on placement sufficiency for Children and Young People and Welsh Governments Eliminate Profit Agenda, which will have a positive impact to children and young people requiring services.</p> <p>There are no changes to the eligibility criteria for any of the services.</p> <p>Providers of various services, both commissioned and in-house, develop care and support plans in conjunction with children, young people and families. This plan is person-centred and will take into account any specific requirements resulting from</p>

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Sex	X		<p>Services are delivered across all genders. Employees of providers may have a protected characteristic due to their sex.</p> <p>The strategy sets out plans to deliver on placement sufficiency for Children and Young People and Welsh Governments Eliminate Profit Agenda, which will have a positive impact to children and young people requiring services.</p> <p>There are no changes to the eligibility criteria for any of the services.</p> <p>Providers of various services, both commissioned and in-house, develop care and support plans in conjunction with children, young people and families. This plan is person-centred and will take into account any specific requirements resulting from children's, young persons and families' protected characteristics to ensure that there is equality of outcomes.</p> <p>Contracts with commissioned providers have clauses relating to ensuring compliance with the relevant equalities legislation.</p> <p>In-house and Commissioned providers are required to implement monitoring systems, which will also help to identify if any aspect of the service has led to unintended/unidentified negative impacts on children and young people with a protected characteristic.</p> <p>The various services have monitoring systems in place to ensure that staff are adequately trained and meet relevant standards (e.g. for administration of medication, manual handling). Further monitoring systems are in place to ensure that the services delivered are of a good quality and meet children and young people's personal</p>

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Sexual orientation	X		<p>Services are delivered across all sexual orientations. Employees of providers may have a protected characteristic due to their sexual orientation.</p> <p>The Placement Commissioning strategy sets out plans to deliver on placement sufficiency for Children and Young People and Welsh Governments Eliminate Profit Agenda, which will have a positive impact to children and young people requiring services.</p> <p>There are no changes to the eligibility criteria for any of the services.</p>

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

- Monitoring of the Services by the CCU
- Monitoring of internal services by CYPS
- Analysis of any complaints and safeguarding referrals relating to the Services by the CCU
- Analysis of CIW Inspection Reports on Services by the CCU
- Analysis of Provider monitoring data by the CCU
- Monitoring of the Strategic Plan by the CCU
- Obtaining feedback from stakeholders
- Ongoing monitoring of the Placements Commissioning Plan 2024-2027

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			Prevention and early intervention services will support children, young people and families with care and support needs to remain safe in their own homes and communities.

To advance equality of opportunity between different groups	X			Enables children, young people and families with care and support needs to have equality of opportunity to remain living in their own homes and communities.
To foster good relations between different groups	X			Enables children, young people and families with care and support needs to remain in their local communities.

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

- Monitoring of the Services by the CCU
- Monitoring of internal services by CYPS
- Analysis of any complaints and safeguarding referrals relating to the Services.
- Analysis of CIW Inspection Reports on Services by the CCU
- Analysis of Provider monitoring data by the CCU
- Monitoring of the Strategic Plan by the CCU
- Obtaining feedback from stakeholders
- Ongoing monitoring of the Placements Commissioning Plan 2024-2027

4. Socio Economic Duty

Impact	Details of the impact/advantage/disadvantage
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Positive/Advantage	<p>Social care helps to support people that may be more likely to have a low socio-economic status to manage their health and wellbeing needs and enables children, young people and families to achieve their personal outcomes.</p> <p>Consideration of in-house services will create new employment opportunities within the Council, which will have a positive economic impact within Neath Port Talbot.</p>
Negative/Disadvantage	
Neutral	<p>Consideration of in-house services will create new employment opportunities within the Council, which will have a positive economic impact.</p> <p>For employees of the providers, their employment will continue.</p>

What action will be taken to reduce inequality of outcome

- Monitoring of the Services by the CCU
- Monitoring of internal services by CYPS
- Analysis of any complaints and safeguarding referrals relating to the Services.
- Analysis of CIW Inspection Reports on Services by the CCU
- Analysis of Provider monitoring data by the CCU
- Monitoring of the Strategic Plan by the CCU
- Obtaining feedback from stakeholders
- Ongoing monitoring of the Placements Commissioning Plan 2024-2027

5. Community Cohesion/Social Exclusion/Poverty

	+	-	+/-	Why will it have this impact?
Community Cohesion	X			Enables children and young people with care and support needs to remain with their families and/or in their local communities wherever possible.
Social Exclusion	X			Enables children and young people with care and support needs to remain with their families and/or in their local communities wherever possible.
Poverty	X			Consideration of in-house services will create new employment opportunities within the Council, which will have a positive economic impact. For employees of the providers, their employment will continue.

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

- Monitoring of the Services by the CCU
- Monitoring of internal services by CYPS
- Analysis of any complaints and safeguarding referrals relating to the Services.
- Analysis of CIW Inspection Reports on Services by the CCU
- Analysis of Provider monitoring data by the CCU
- Monitoring of the Strategic Plan by the CCU
- Obtaining feedback from stakeholders
- Ongoing monitoring of the Placements Commissioning Plan 2024-2027

6. Welsh

	+	-	+/-	Why will it have this effect?
What effect does the initiative have on: – people’s opportunities to use the Welsh language	X			There will continue to be a requirement for commissioned providers and in-house services to deliver services to the service users in their chosen first language. External providers are bound by employment legislation relating to the Welsh Language Staff recruitment into in-house services will be in line with HR policies, process and all relevant legislation.
– treating the Welsh and English languages equally	X			There will continue to be a requirement for commissioned providers and in-house services to deliver services to the service users in their chosen first language. External providers are bound by employment legislation relating to the Welsh Language Staff recruitment into in-house services will be in line with HR policies, process and all relevant legislation.

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

- Monitoring of the Services by the CCU
- Monitoring of internal services by CYPS
- Analysis of any complaints and safeguarding referrals relating to the Services.
- Analysis of CIW Inspection Reports on Services by the CCU
- Analysis of Provider monitoring data by the CCU
- Monitoring of the Strategic Plan by the CCU
- Obtaining feedback from stakeholders

- Ongoing monitoring of the Placements Commissioning Plan 2024-2027

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	N/A.
To promote the resilience of ecosystems, i.e. supporting protection of the wider environment, such as air quality, flood alleviation, etc.			X	N/A.

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

N/A.

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 services help to support children, young people and families with achievement of their long term health and wellbeing outcomes. These include services which play an essential part in supporting children, young people and families to live safely within their own homes and local communities.</p> <p>The Placement Commissioning Strategy outlines how we plan to ensure that there are sustainable services that are more responsive to children, young people’s and families’ individual needs.</p>
ii. Prevention – preventing problems occurring or getting worse	<p>The Placement Commissioning Strategy highlights the need to focus on care and support services that help to minimise or prevent the need for more complex/long-term services. These include services which promote the voice of the child, as well as services in the community e.g. foster care which will prevent the need for more institutionalised support such as a residential care home admission.</p>
iii. Collaboration – working with other services internal or external	<p>Involves working with in-house, private and third sector providers of various services. It also involves more personalised working with children, young people and families in the development of services to meet their care and support needs.</p>
iv. Involvement – involving people, ensuring they reflect the diversity of the population	<p>The Placement Commissioning Strategy supports a more person-centred approach to the delivery of care, which is more flexible to children, young people’s and families’ individual needs. Feedback from service users and providers (including staff) will be obtained as part of service evaluation.</p>

	Providers are asked to obtain service user feedback in order to inform the delivery and performance of services. Service user feedback is also gathered as part of contract monitoring.
v. Integration – making connections to maximise contribution to:	Is underpinned by the values and principles of the Social Services and Wellbeing Act 2014, by offering maximum voice and control to service users and by ensuring market stability.
Council’s well-being objectives	All of our children and young people have the best start in life, so they can be the best they can be.
Other public bodies objectives	The Placement Commissioning Strategy sets out how the Council and its partners can support children, young people and families resident in the county to live as safely and independently as possible with appropriate levels of social care and support. Create safe, confident and resilient communities, focusing on vulnerable children, young people and families.

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.

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| <ul style="list-style-type: none"> • Monitoring of the Services by the CCU • Monitoring of internal services by CYPS • Analysis of any complaints and safeguarding referrals relating to the Services. • Analysis of CIW Inspection Reports on Services by the CCU • Analysis of Provider monitoring data by the CCU • Monitoring of the Strategic Plan by the CCU • Obtaining feedback from stakeholders <p>Ongoing monitoring of the Placements Commissioning Plan 2024-2027</p> |
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10. Assessment Conclusions

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

	Conclusion
Equalities	The indication is that the Ongoing monitoring of the Placements Commissioning Plan 2024-2027 will have a positive impact, however systems will be in place that will allow officers to check that the Ongoing monitoring of the Placements Commissioning Plan 2024-2027 is having its intended outcomes and not resulting in any unintended negative consequences for children and young people with a protected characteristic.
Socio Economic Disadvantage	The indication is that the Ongoing monitoring of the Placements Commissioning Plan 2024-2027 will have a positive impact, however systems will be in place that will allow officers to check that the Ongoing monitoring of the Placements Commissioning Plan 2024-2027 is having its intended outcomes and not resulting in any unintended negative consequences for children, young people and families in regards to social economic disadvantages.
Community Cohesion/ Social Exclusion/Poverty	The indication is that the Ongoing monitoring of the Placements Commissioning Plan 2024-2027 will have a positive impact, however systems will be in place that will allow officers to check that the Ongoing monitoring of the Placements Commissioning Plan 2024-2027 is having its intended outcomes and not resulting in any unintended negative consequences for children, young people and families in regards to community cohesion, social exclusion and/or poverty.
Welsh	The indication is that the Ongoing monitoring of the Placements Commissioning Plan 2024-2027 will have a positive impact, however systems will be in place that will allow officers to check that the Ongoing monitoring of the Placements Commissioning Plan 2024-2027 is having its intended outcomes and not resulting in any unintended negative consequences for children, young people and families wishing to use the Welsh Language.
Biodiversity	Not applicable to the proposal under review.
Well-being of Future Generations	The indication is that the Ongoing monitoring of the Placements Commissioning Plan 2024-2027 will have a positive impact, however systems will be in place that will allow officers to check that the Ongoing monitoring of the Placements Commissioning Plan 2024-2027 is having its intended outcomes and not resulting in any unintended negative consequences against the aims of the well-being of future generations.

Overall Conclusion

Please indicate the conclusion reached:

- **Continue** - as planned as no problems and all opportunities have been maximised
- **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

- No negative impacts identified at this stage and the indication is that the impact will be positive.
- Processes are in place to monitor the impact for any unintended negative consequences.

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?
Monitoring of the Services by the Common Commissioning Unit	PO Commissioning	Annually	Monitoring reports
Monitoring of internal services by CYPS	PO CYPS	Annually	Internal reports
Analysis of any complaints and safeguarding referrals	PO Commissioning	Ongoing as they are received	Investigation reports and corrective action plans

relating to the Services by the Common Commissioning Unit			
Analysis of CIW Inspection Reports on Services by the Common Commissioning Unit	PO Commissioning	As they are published	Monitoring reports
Analysis of CIW Inspection Reports on Internal Services	PO CYPS	As they are published	Internal reports
Analysis of Provider monitoring data by the Common Commissioning Unit	PO Commissioning	Annually	Monitoring reports
Ensure contracts have clauses relating to compliance with relevant equalities legislation	PO Commissioning	Before service commences	Contract
Ensure contracts have clauses around Welsh Language	PO Commissioning	Before service commences	Contract
Providers to implement own monitoring systems	Provider	On commencement of service	Monitoring reports
Internal Services to implement Monitoring systems	PO CYPS	On commencement of service	Internal reports

12. Sign off

	Name	Position	Signature	Date
Completed by	Hayley Short	Principal Officer for Commissioning	H Short	29/10/2024
Signed off by	Keri Warren	Head of Service		