

Equality Impact Assessment (EIA) Report

This form should be completed for each Equality Impact Assessment on a new or existing function, a reduction or closure of service, any policy, procedure, strategy, plan or project which has been screened and found relevant to equality.

Please refer to the 'EIA Report Form Guidance' while completing this form. If you need further support please contact acesstoservices@swansea.gov.uk.

Where do you work?
Service Area: Western Bay – Community Services – Care Home Commissioning for Older People
Directorate: People/Social Services/Adult Services

(a) This EIA is being completed for a...

Service/ Function <input type="checkbox"/>	Policy/ Procedure <input type="checkbox"/>	Project <input type="checkbox"/>	Strategy <input checked="" type="checkbox"/>	Plan <input type="checkbox"/>	Proposal <input type="checkbox"/>
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(b) Please name and describe below...

Western Bay – Community Services – Care Home Commissioning for Older People

The four partners of the Western Bay Programme (City and County of Swansea, Neath Port Talbot County Borough Council, Bridgend County Borough Council and Abertawe Bro Morgannwg University Health Board), have worked together to develop the Western Bay Commissioning Strategy for Care Homes for Older People (aged 65 and over) to ensure a sustainable range of high quality care home placements are available to meet the needs of older people across the region. This commissioning strategy takes into account the change in demographics of the area e.g. the rise in an ageing population, the national and local context including legislation that must be adhered to and market characteristics of the Western Bay area particularly the services now accessible in the community to allow older people to live more independent, healthy lives in their own homes for longer. The strategy outlines the expectation that this will lead to more people with complex needs requiring care home placements for shorter periods. It is also the expectation that there will be an increase in people who have dementia and/or nursing care needs and a reduction in traditional residential care beds as people live more independent lives, in their own homes for longer.

(c) It was initially screened for relevance to Equality and Diversity on....08/01/2016

(d) It was found to be relevant to...

Children/young people (0-18)..... <input type="checkbox"/>	Religion or (non-)belief <input checked="" type="checkbox"/>
Any other age group (18+) <input checked="" type="checkbox"/>	Sex <input type="checkbox"/>
Disability <input checked="" type="checkbox"/>	Sexual orientation <input checked="" type="checkbox"/>
Gender reassignment <input type="checkbox"/>	Welsh language <input checked="" type="checkbox"/>
Marriage & civil partnership <input checked="" type="checkbox"/>	Poverty/social exclusion <input checked="" type="checkbox"/>
Pregnancy and maternity <input type="checkbox"/>	Carers (inc. young carers) <input checked="" type="checkbox"/>
Race <input checked="" type="checkbox"/>	Community cohesion <input checked="" type="checkbox"/>

(e) Lead Officer

Name: Jessica Fitzpatrick
Job title: Project Coordinator

(f) Approved by Head of Service

Name: Sara Harvey
Date: December 2016

Section 1 – Aims (See guidance):

Briefly describe the aims of the initiative:

What are the aims?

Following the signoff by all four partner organisations of the Western Bay collaborative “Delivering Improved Community Services” in 2013 and the identification of the strategic consequences for the care home sector in the intermediate tier business case in 2014, an urgent requirement was recognised to identify the role of a scalable, sustainable, and resilient care home sector. This model would need to be capable of providing high quality services for our most frail and vulnerable people. It was agreed that this would be developed on a regional basis building on collaboration that had already commenced.

A Western Bay Market Position Statement (MPS) to establish a baseline of the care home market across the region was concluded in May 2015 and its key messages highlighted the increasing ageing population, the increase of support in the community and its direct impact on older people living more independent lives for longer in their own homes. The conclusions of the Western Bay MPS have informed the development of the Western Bay Care Home Commissioning Strategy for Older People and the MPS’ conclusions directly correlate with the findings, the approach for the future and our commissioning intentions for this market and the people who use these services going forward.

The strategy’s objective is to deliver better access to care homes, improved choice for individuals with high quality and value for money care home services that are sustainable for our future population. The document outlines the shift in demographics across Western Bay, with an increase in the ageing population and how this, along with an increase in community services, will impact on our services and requirements from care home providers. Throughout the development process, colleagues from each local authority area, professional group and partners reported consistent market findings, issues and barriers across the board and these have been reflected throughout the document.

The key messages from the Care Home Commissioning Strategy outline:

- The fundamental objectives are to provide better access and improved choice for service users and families regarding care homes. These will be of consistent high quality providing value for money that is sustainable for our future population.
- Shift our care home market towards catering more appropriately for an ageing population and work with providers that have a flexible and innovative approach to meet the demand this shift will result in.
- Acknowledgement that residential beds will always be required, although with an increase in community support the increase in our ageing population will not result in an increase in residential beds. Due to this increase of community based services, it is anticipated that care homes will be required to provide more specialist, complex care for shorter periods of time for older people instead of an increase in traditional residential care that in isolation the increase in life expectancy would indicate.

Our three key commissioning priorities outlined in the strategy are to:

- Develop strong relationships with existing care home providers to support them to meet the changing needs of our population with consistent high quality services
- Work strategically with new care home providers to develop a sustainable range of care home facilities across the region
- Where care home services are not in line with our strategic approach and/or are not of adequate quality, we will seek to decommission these.

At present, in some areas across Western Bay, care home placements are provided and care homes are managed by the Local Authority area they are based in. The forward plan of continuing to provide this is dependent on the local agendas e.g. although Neath Port Talbot no longer own any residential care homes, Swansea still own, manage and run 6.

Who has responsibility?

Western Bay Care Home Commissioning Subgroup, Western Bay Community Services Planning and Delivery Board, Western Bay Programme Team, Western Bay Leadership Group and Western Bay Regional Partnership Board
Project Managers – Jessica Fitzpatrick (Project Coordinator), Western Bay
Community Services and Care Home Commissioning Project Lead – Vicky Warner, Nurse Director
Primary and Community Delivery Unit, ABMU
Project Sponsor – Alex Howells, Chief Operating Officer, ABMU
Cabinet Members in x3 Local Authority areas
Local Authority colleagues (in particular Social Services) including Contracting and Commissioning Officers, Residential Care, Day Care, Intermediate Care, Home Care
Health Board colleagues including Long Term Leads, Intermediate Care, etc.
Third Sector
Independent Providers
Welsh Government support for legislation
CSSIW

Who are the stakeholders?

The public/residents across Western Bay (e.g. service users, patients, carers, family members, people wanting information and advice on residential care services)
Social Services, Health Board and integrated staff working in CCoS, NPTCBC, BCBC and ABMU
General Practitioners
Mental Health Services
Third Sector providers of services including advocacy
Cabinet Members in each of the 3 LA's
Care providers encompassing both community and residential care
The public/residents outside Western Bay that live in residential homes across the Western Bay region, the public/residents' families and services that are provided to these people from their county of origin.

Section 2 - Information about Service Users (See guidance):

Please tick what information you know about your service users and provide details/evidence of how this information is collected.

Children/young people (0-18).....	<input type="checkbox"/>	Carers (inc. young carers)	<input checked="" type="checkbox"/>
Any other age group (18+)	<input checked="" type="checkbox"/>	Race	<input type="checkbox"/>
Disability	<input checked="" type="checkbox"/>	Religion or (non-)belief	<input type="checkbox"/>
Gender reassignment	<input type="checkbox"/>	Sex	<input type="checkbox"/>
Marriage & civil partnership.....	<input type="checkbox"/>	Sexual orientation.....	<input type="checkbox"/>
Pregnancy and maternity	<input type="checkbox"/>	Welsh language.....	<input type="checkbox"/>

What information do you know about your service users and how is this information collected?

Extensive service user information including information on protected characteristics is collected, on admission, by both independent and Local Authority owned care homes. Additionally extensive information has been gathered from each of the LA's and ABMU in relation to older people over the age of 65 who live in care homes in the Western Bay area and who receive Local Authority funding or Funded Nursing Care. This information is used to monitor and evaluate all aspects of the service and can be given in more detail if required.

(<http://www.daffodilcymru.org.uk/>) and displays the following:

Over the next 10 years (2015 – 2025) it is expected that the composition of the population across Wales will change:

- The total population of people over the age of 65 across Wales is expected to grow from 626,300 to 734,450; an **increase of 17%**
- More significantly, it is expected that the population of people over the age of 80 years to grow from 166,230 to 223,270; an **increase of 34%**
- Across Western Bay the total population of people over the age of 65 is expected to grow from 103,140 to 120,260; an **increase of 17%**
- Whilst the population of people over the age of 80 years will grow from 27,430 to 35,870; an **increase of 30%**
- At the same time, adults of working age (18 – 64) will increase only slightly from 319,720 to 320,070 which is an increase of less than 1%
- Over the next 15 years, the number of people over the age of 65 years with dementia is expected to grow by 51% from 42,322 to 64,087.
- Additionally over the next 10 years, the number of people over the age of 65 years receiving community based services is expected to rise from 8300 in 2015 to 10,548 in 2025 which is an increase of 27%.

This clearly highlights the need to tailor and revolutionise existing services across Western Bay to meet the needs of an increasing population of older people. Data is also being reviewed as part of the Population Assessment required by the Social Services & Wellbeing (Wales) Act which will include information on the aforementioned protected characteristics.

Any Actions Required?

- Due to the change in registration of residential beds, the CSSIW register care home beds as residential or nursing. They no longer use the registration category 'EMI' and further work is required to identify the number of dementia care beds available in care homes in Western Bay, and accurate vacancy reports. Work has commenced on this via the Health Board who have employed fixed term 'Dementia Coordinators' to assess the number of people identified as living with dementia by GPs compared to those living with dementia in care home placements.
- Data regarding self-funders whose contract is with an independent care home provider is not available but would be useful in the future – this would require direct contact with, in the main, independent providers which they are not legally obliged to provide the Local Authorities and/or Health Board with.
- In response to the Older People's Commissioner's report 'A Place to Call Home', the use of antipsychotics is currently being investigated to gain an understanding of the prevalence and use of this medication.
- Additionally in response to the Older People's Commissioner's report 'A Place to Call Home', a pilot project is underway to establish the importance of spirituality to older people moving to care homes from hospital. A further aspect of the pilot is to facilitate the linkages between communities and faith centres based in these communities and care homes in the areas they are based.
- Review data reflected in the Population Assessment as required by the Social Services & Wellbeing (Wales) Act to establish further knowledge on the characteristics of older people living in care homes.

Please consider the possible impact on the different protected characteristics. This could be based on service user information, data, consultation and research or professional experience (e.g. comments and complaints).

	Positive	Negative	Neutral	Needs further investigation
Children/young people (0-18)	→ <input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Any other age group (18+)	→ <input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Disability	→ <input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Gender reassignment	→ <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Marriage & civil partnership	→ <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Pregnancy and maternity	→ <input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Race	→ <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Religion or (non-)belief	→ <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Sex	→ <input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Sexual orientation	→ <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Welsh language	→ <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Carers (inc. young carers)	→ <input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Thinking about your answers above, please explain in detail why this is the case.

As mentioned in the previous sections, the strategy has been developed specifically as part of the Western Bay Community Services Programme and focuses on older people (aged 65 and over) and will therefore directly impact this group of people first and foremost. However, included in the strategy, is the increase of community services available to be delivered in each person's home, and therefore will have significant impact on carers as well as service users. Additionally, due to the focus of this piece of work we do not anticipate any positive or negative effects on children/young people or in relation to pregnancy/maternity.

Also, as the strategy outlines, the increase of services in the community aims to maintain individuals' independence for longer in the community, this should, in turn, have a direct positive effect on older people with disabilities and their carers.

Additional investigation is required for service users living in care homes in some situations in relation to the protected characteristics of gender reassignment, marriage/civil partnership and sexual orientation. Additional investigation on the impact of race, religion and the use of Welsh language is also necessary to be conducted. This can be done via the development of the regional Population Assessment required by the Social Services & Wellbeing (Wales) Act by April 2018.

What consultation and engagement has been undertaken (e.g. with the public and/or members of protected groups) to support your view? Please provide details below.

The public consultation started on May 6th for 90 days on the Western Bay Care Home Commissioning Strategy and will close on the 3rd August. This period enabled us to launch an e-survey on the Western Bay website linking with the four statutory organisations and Community Voluntary Councils to cascade it to their teams. Its publication on the Western Bay and partners internet sites also enabled members of the public to respond. The consultation has been appropriately publicised in order for anyone who wishes to have the opportunity to contribute – for example, the details have been included in the quarterly Western Bay newsletter and has been tweeted by the statutory organisations and CVCs. A consultation event was planned and took place on the 15th July. Attendees at the event included Local Authority and Health Board colleagues, representatives from the housing and training sector as well as care home providers, members of various older people's groups, volunteers and carers. Feedback via phone call and email directly to the Project Manager has also yielded comments and suggestions for amendments to the final document.

Indications from the feedback from the survey and event reflect a consistency with the conclusions made in the strategy, particularly the increase in community based services for people to live in their own homes for longer, the current limitations in capacity for people needing specialist care and the shortages of qualified staff that will be required to plug the current gap in nursing/specialist care. This reflects recognition that there is a shift occurring in the care home sector for older people.

Any actions required (to mitigate adverse impact or to address identified gaps in knowledge).

- Development of a robust 'customer feedback' mechanism that records and acts on service user and carer comments and a 'stakeholder feedback' mechanism to capture ideas from referrers, Health and Social Services staff as well as the third and independent sectors is in progress. This is being developed in partnership with embedding of the Western Bay Regional Quality Framework and will be reviewed to establish if it can include questions on protected characteristics.
- Data on the other protected characteristics needs to be collected and the effects of the changes on these groups needs to be assessed.
- Further investigation required on those protected characteristics identified in previous section.

Section 4 - Other Impacts:

Please consider how the initiative might address the following issues.

You could base this on service user information, data, consultation and research or professional experience (e.g. comments and complaints).

Foster good relations between different groups	Advance equality of opportunity between different groups
Elimination of discrimination, harassment and victimisation	Reduction of social exclusion and poverty

(Please see the specific Section 4 Guidance for definitions on the above)

Please explain any possible impact on each of the above.

What work have you already done to improve any of the above?

Foster good relations between different groups – Since the beginning of the service re-modelling initiated due to the significant investment received from Welsh Government for Intermediate Care nationally in April 2014, there has been an unified approach to providing care and support to the residents across the region by staff from the Health Board, Local Authorities via Social Services and the Third Sector.

This new approach has led to an improvement in relations between all the providers as they are located in the same place geographically and therefore able to communicate more easily. This is also true for professionals from these organisations and departments in relation to the care home sector where social services staff e.g. contracting officers (Local Authority) are based in the same building as the long term leads (Health Board).

This has been fed back informally across the Western Bay region and an independent longitudinal evaluation of Intermediate Care and its services of which residential reablement is a component of, is in the process of being developed with a report expected by the end of April 2016.

At a number of meetings, workshops and events a common message has been received from all professionals of similar issues and next steps required which have improved both understanding of the service across the region and improved working relationships. Additionally, by implementing the recommendations of the care home strategy it is hoped that this will result in improved relationships between independent providers, Health Board, Local Authorities, Third Sector and service users, carers and families when more appropriate services are available either in the community or from the residential care home sector.

Reduction of social exclusion – The Care Home strategy acknowledges the importance of the increase of community services across Western Bay and the outcomes this will have for our service users. We expect this activity to promote independence for older people thus enriching lives and promoting closer communities as people live in their own homes within their own communities for longer. If a residential placement is deemed appropriate, there is a focus on ensuring the care home is part of the community they are living in e.g. maintain links to family, friends, religious institutions, schools etc.

The requirement in the Social Services & Wellbeing (Wales) Act and in the Older People's Commissioner's report 'A Place to Call Home' clearly outlines the need for advocacy to be available to older people and specifically available to those living in care homes. The strategy acknowledges this requirement and will be included in the implementation plans for each Local Authority area once the strategy is consulted on and finalised.

The Western Bay Community Services project has brought together practitioners, managers and Third Sector providers and advocates at meetings and workshops whilst

developing this strategy in order to develop a shared understanding and collaborative approach to developing good practice.

Ongoing involvement and contribution from all stakeholders has been taken into account whilst developing the Western Bay Care Home Commissioning Strategy from the Local Authorities, Health Board and Third Sector all featuring as part of the membership of the Care Home Commissioning Task & Finish Group and Community Services Planning and Delivery Board that oversees the care homes work stream within Community Services.

Is the initiative likely to impact on Community Cohesion? Please provide details.

This Agreement is likely to have a positive effect on community cohesion as the strategy acknowledges the importance of care homes being part of the community. Further, the focus throughout the strategy of strengthening community services to enable older people (including those with dementia) to remain at home and participate within their own communities and remain independent for as long as is possible thus reducing the length of stay at care homes will, hopefully, also have a positive effect on community cohesion.

How will the initiative meet the needs of Welsh speakers and learners?

Implementation plans of the strategy will also be developed following final sign off after the public consultation is concluded (the date of which will depend on when the four partners confirm that the public consultation can proceed). These implementation plans will be delivered on a local basis by each of the 3 Local Authorities and ABMU Localities and will be developed with due regard to their local implementation of the Welsh Language Standards, including the 'Active Offer'.

Consideration in the future will need to be given to older people, particularly people with dementia, living in care homes whose first language is Welsh. Research has clearly indicated that a number of people living with dementia revert back to their first language which is particularly relevant for people in Wales.

Actions (to mitigate adverse impact or to address identified gaps in knowledge).

- Further work will be required to assess the number of older people in care homes across Western Bay whose preferred language of communication is Welsh. Further work will also be required to ascertain the number of carers that are able to communicate in Welsh and what training is available if this number is insufficient. This work is initially being undertaken on a wider basis as part of the Population Assessment required by the Social Services & Wellbeing (Wales) Act and will be reviewed once the current information available is extracted.

Section 5 - United Nations Convention on the Rights of the Child (UNCRC):

In this section, we need to consider whether the initiative has any direct or indirect impact on children. Many initiatives have an indirect impact on children and you will need to consider whether the impact is positive or negative in relation to both children's rights and their best interests

Please visit <http://staffnet/eia> to read the UNCRC guidance before completing this section.

Will the initiative have any impact (direct or indirect) on children and young people? If not, please briefly explain your answer and proceed to Section 6.

We would suggest the Western Bay Care Home Commissioning Strategy will not have any impact on children and young people as the service is specifically designed and delivered to provide services to older people aged 65 and over. In the situation where a child or young person was caring for an older person aged 65 or over, this initiative would have a positive effect on their caring responsibilities in providing support to the adult to ensure they are able to live a more independent life with improved wellbeing therefore requiring less support from their carer or having the opportunity to make an informed choice on residential care for an older person, rather than in a crisis.

Is the initiative designed / planned in the best interests of children and young people? Please explain your answer.

Best interests of the child (Article 3): The best interests of children must be the primary concern in making decisions that may affect them. All adults should do what is best for children. When adults make decisions, they should think about how their decisions will affect children. This particularly applies to budget, policy and law makers.

This initiative is specifically designed to improve the health and wellbeing of older people, particularly those living in residential homes, over the age of 65. However this could have a positive impact on children and young people if they are responsible for caring for an older person where community services are available to them to prevent a residential admission or where residential care is identified as suitable, improved choice and consistent quality will be available to older people and the decision will not have to be made in a crisis.

Actions (to mitigate adverse impact or to address identified gaps in knowledge).

N/A

Section 6 - Monitoring arrangements:

Please explain the arrangements in place (or those which will be put in place) to monitor this initiative:

Monitoring arrangements:

As the strategy is a long term (10 year) vision, the document will be formally reviewed every three years via the Western Bay Care Home Commissioning Subgroup. Additionally it will be monitored on a more regular basis at the Subgroup meetings. Further, the Care Homes Subgroup reports to the Western Bay Community Services Planning and Delivery Board, the Western Bay Leadership Group and the Western Bay Regional Partnership Board. The full Community Services Governance Structure can be provided if required.

Governance arrangements will be reviewed on an annual basis.

Actions: N/A

Section 7 – Outcomes:

Having completed sections 1-5, please indicate which of the outcomes listed below applies to your initiative (refer to the guidance for further information on this section).

Outcome 1: Continue the initiative – no concern



Outcome 2: Adjust the initiative – low level of concern



Outcome 3: Justify the initiative – moderate level of concern



Outcome 4: Stop and refer the initiative – high level of concern.



For outcome 3, please provide the justification below:

For outcome 4, detail the next steps / areas of concern below and refer to your Head of Service / Director for further advice:

N/A

Section 8 - Publication arrangements:

On completion, please follow this 3-step procedure:

1. Send this EIA report and action plan to the Access to Services Team for feedback and approval – accesstoservices@swansea.gov.uk
2. Make any necessary amendments/additions.
3. Provide the final version of this report to the team for publication, including email approval of the EIA from your Head of Service. The EIA will be published on the Council's website - this is a legal requirement.

Action Plan:

Objective - What are we going to do and why?	Who will be responsible for seeing it is done?	When will it be done by?	Outcome - How will we know we have achieved our objective?	Progress
Due to the change in registration of residential beds, the CSSIW register care home beds as residential or nursing. They no longer use the registration category 'EMI' and further work is required to identify the number of dementia care beds available in care homes in Western Bay, and accurate vacancy reports.	Liaise with Care Home Commissioning T&F Group collectively	Evaluation from Dementia Coordinators is expected in April 2016. Further work to be completed once awareness of the content of this report	Number of older people living with dementia in care homes across the Western Bay area will be available at a point in time.	Work has commenced on this via the Health Board who have employed fixed term 'Dementia Coordinators' to assess the number of people identified as living with dementia by GPs compared to those living with dementia in care home placements.
Data regarding self-funders whose contract is with an independent care home provider is not available but would be useful in the future – this would require direct contact with, in the main, independent providers which they are not legally obliged to provide the Local Authorities and/or Health Board with.	Liaise with Care Home Commissioning Subgroup	Investigate numbers during the public consultation	Number of people self-funding in the care homes across Western Bay region will be available and broken down by type of placement i.e. residential or nursing and number of self-funders living in care homes with dementia.	Not yet progressed
In response to the Older People's Commissioner's report 'A Place to Call Home', the use of	Medicines Management Team in the ABMU Health Board – Subgroup of	Ongoing until December 2016 due to the complexities of the data and analysis to be	Number of people taking antipsychotic medication living in care homes will be	Subgroup established with membership and Terms of Reference agreed. Discussion

antipsychotics is currently being investigated to gain an understanding of the prevalence and use of this medication.	the Care Homes Commissioning T&F Group.	completed	known at a point in time. Investigation will then be undertaken as to the reasoning behind prescription of the medicines.	and monitoring at monthly Care Homes T&F Group
Review data reflected in the Population Assessment as required by the Social Services & Wellbeing (Wales) Act to establish further knowledge on the characteristics of older people living in care homes.				
Additionally in response to the Older People's Commissioner's report 'A Place to Call Home', a pilot project is underway to establish the importance of spirituality to older people moving to care homes from hospital. A further aspect of the pilot is to facilitate the linkages between communities and faith centres based in these communities and care homes in the areas they are based.	Liaise with Care Home Commissioning Subgroup and ABMU Chaplaincy Team	Ongoing to March 2017 – reviewed on a monthly basis at Care Home Commissioning Subgroup meetings	We will have established the number of people spoken to and the number of people confirming that spirituality is important to them in the pilot area. We will also have feedback on the faith centres in the pilot area that link with care homes and feedback from residents as to if they have benefited.	Pilot project plan in place in selected area – awaiting ethics approval to progress.
Development of a robust 'customer feedback' mechanism that records and acts on service user and carer comments and a	Liaise with contracting officers across the Western Bay region via the Care Homes Commissioning Task &	Initially by May 2016 to establish whether existing mechanism in place	Robust customer feedback form will be produced and used during contract monitoring and on an	To be progressed once the strategy is in the consultation phase.

<p>'stakeholder feedback' mechanism to capture ideas from referrers, Health and Social Services staff as well as the third and independent sectors is in progress. This is being developed in partnership with embedding of the Western Bay Regional Quality Framework and will be reviewed to establish if it can include questions on protected characteristics.</p>	<p>Finish Group to establish existing feedback mechanisms.</p>		<p>ad hoc basis.</p>	
<p>Data on the other protected characteristics needs to be collected and the effects of the changes on these groups needs to be assessed. Further investigation required on those protected characteristics identified in previous section.</p>	<p>This will be investigated during the public consultation of the strategy.</p>	<p>Public consultation to commence as soon as x4 partnership organisations agree for it to go forward.</p>	<p>Awareness of the impact on protected characteristics of people living in care homes.</p>	<p>To be progressed when the public consultation is initiated.</p>
<p>Further work will be required to assess the number of older people in care homes across Western Bay whose preferred language of communication is Welsh. Further work will also be required to ascertain the number of carers that are able to communicate in</p>	<p>This will be investigated during the public consultation of the strategy and as part of the Population Assessment required by the Social Services & Wellbeing (Wales) Act.</p>	<p>Public consultation to commence as soon as x4 partnership organisations agree for it to go forward. The Population Assessment is required by April 2017.</p>	<p>The availability of the data to inform us of the number of people living in care homes that speak Welsh and the availability of the data of the number of carers that speak Welsh.</p>	<p>To be progressed when the public consultation is initiated and during the production of the Population Assessment.</p>

Welsh and what training is available if this number is insufficient. This work is initially being undertaken on a wider basis as part of the Population Assessment required by the Social Services & Wellbeing (Wales) Act and will be reviewed once the current information available is extracted.				
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*** Please remember to be 'SMART' when completing your action plan (Specific, Measurable, Attainable, Relevant, Timely).**