

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	Andrew Potts	Commissioning Officer	15 th May 2019

1. Details of the initiative

	Title of the Initiative: Adult Services Respite Allocation Policy
1a	Service Area: Adult Services
1b	Directorate: Social Services, Health & Housing
1c	Summary of the initiative: To set out eligibility criteria for assessing unpaid carers' need for respite services.
1d	Who will be directly affected by this initiative? Current and future service users and their unpaid carers.
1e	When and how were people consulted? Permission is being sought to carry out a 90 day consultation.
1f	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.

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 Adult Respite Services:

The Social Services Client Index shows that there are currently 196 people with an assessed need for general respite (typically older people accessing Plas Bryn Rhosyn or similar provision). The table below shows those people according to age group and the number of nights respite allocation in the year:

Age Group	Nights Allocated															Total
	7	14	16	20	21	24	26	28	36	37	42	48	56	58	78	
<20						1			1							2
30s									1							1
50s		1							2				1			4
60s									2				5			7
70s			8	1	1				19		5		9		1	44
80s	1	3	7			1	1	1	36	1	5	1	24			81
90s			7			1		1	32		2		11	1		55
100+			1										1			2
Total	1	4	23	1	1	3	1	2	93	1	12	1	51	1	1	196

It can be seen that people in their 80s are most likely users of this service (81 people), and that the most common allocation is for 36 nights (93 people).

Social Services data also shows that in the last year 175 people had an assessed need for general respite. During that period, those assessed received a total allocation amounting to over 5,500 nights per annum, while analysis shows that the number of nights actually used was just over 2,800. This means that uptake was approximately 51% of assessed entitlement.

In addition, 129 people had an assessed need for complex respite services (typically adults with learning disabilities accessing Trem Y Mor) in the last year. During that period, those assessed received a total allocation amounting to over 5,200 nights per annum, while analysis shows that the number of nights actually used was nearly 4,100. This means that uptake was approximately 79% of assessed entitlement.

	Nights Allocated										
	16	24	28	35	36	42	45	48	55	56	Total
No. of Clients	4	2	10	1	32	1	1	1	1	76	129

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>Data shows that a high number of people receiving general respite have a protected characteristic by virtue of their age.</p> <p>The allocation tool takes into account individual circumstances of the carer and the cared for person in order to ensure that respite services provide a needs-led, person centred response. Therefore the protected characteristics of those to whom the service is delivered and the needs of carers requiring respite are considered as part of the needs assessment process and catered for in the individual's bespoke support plan.</p>

			<p>This proposal better ensures that peoples protected characteristics are considered by removing the banding system and replacing this with a system which is more in line with the Social Services and Wellbeing (Wales) Act 2014 by looking at the individual circumstances of the carer and cared for person.</p>
Disability	X		<p>Data shows that people with complex needs due to their disability are likely to require respite.</p> <p>The allocation tool takes into account individual circumstances of the carer and the cared for person in order to ensure that respite services provide a needs-led, person centred response. Therefore the protected characteristics of those to whom the service is delivered and the needs of carers requiring respite are considered as part of the needs assessment process and catered for in the individual's bespoke support plan.</p> <p>This proposal better ensures that peoples protected characteristics are considered by removing the banding system and replacing this with a system which is more in line with the Social Services and Wellbeing (Wales) Act 2014 by looking at the individual circumstances of the carer and cared for person and how their respite needs can be best met.</p>
Gender reassignment	X		<p>Access to respite is unlikely to be solely due to a person's gender identity. However, personal circumstances relating to a person gender identity may have an impact on how respite is delivered or the level of respite required.</p> <p>The allocation tool takes into account individual circumstances of the carer and the cared for person in order to ensure that respite services provide a needs-led, person centred response. Therefore the protected characteristics of those to whom the service is delivered and the needs of carers requiring respite are considered as part of the needs assessment process and catered for in the individual's bespoke support plan.</p>

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Marriage & civil partnership	X		<p>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.</p> <p>The allocation tool takes into account individual circumstances of the carer and the cared for person in order to ensure that respite services provide a needs-led, person centred response. Therefore the protected characteristics of those to whom the service is delivered and the needs of carers requiring respite are considered as part of the needs assessment process and catered for in the individual's bespoke support plan.</p> <p>This proposal better ensures that peoples protected characteristics are considered by removing the banding system and replacing this with a system which is more in line with the Social Services and Wellbeing (Wales) Act 2014, by looking at the individual circumstances of the carer and cared for person and how their respite needs can be best met.</p>
Pregnancy and maternity	X		<p>It is possible that someone providing unpaid care may be, or become, pregnant which can cause difficulties in maintaining the caring role. It is also 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 respite needs.</p> <p>The allocation tool takes into account individual circumstances of the carer and the cared for person in order to ensure that respite services provide a needs-led, person centred response. Therefore the protected characteristics of those to whom the service is delivered and the needs of carers requiring respite are considered as part of the needs assessment process and catered for in the individual's bespoke support plan.</p>

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Race	X		<p>Access to respite is unlikely to be solely due to a person's race. However, personal circumstances relating to a person race may have an impact on how respite is delivered or the level of respite required.</p> <p>The allocation tool takes into account individual circumstances of the carer and the cared for person in order to ensure that respite services provide a needs-led, person centred response. Therefore the protected characteristics of those to whom the service is delivered and the needs of carers requiring respite are considered as part of the needs assessment process and catered for in the individual's bespoke support plan.</p> <p>This proposal better ensures that peoples protected characteristics are considered by removing the banding system and replacing this with a system which is more in line with the Social Services and Wellbeing (Wales) Act 2014, by looking at the individual circumstances of the carer and cared for person and how their respite needs can be best met.</p>
Religion or belief	X		<p>Access to respite 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 respite is delivered or the level of respite required.</p> <p>The allocation tool takes into account individual circumstances of the carer and the cared for person in order to ensure that respite services provide a needs-led, person centred response. Therefore the protected characteristics of those to whom the service is delivered and the needs of carers requiring respite are considered as part</p>

			<p>of the needs assessment process and catered for in the individual's bespoke support plan.</p> <p>This proposal better ensures that peoples protected characteristics are considered by removing the banding system and replacing this with a system which is more in line with the Social Services and Wellbeing (Wales) Act 2014, by looking at the individual circumstances of the carer and cared for person and how their respite needs can be best met.</p>
Sex	X		<p>Access to respite 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 respite is delivered or the level of respite required.</p> <p>The allocation tool takes into account individual circumstances of the carer and the cared for person in order to ensure that respite services provide a needs-led, person centred response. Therefore the protected characteristics of those to whom the service is delivered and the needs of carers requiring respite are considered as part of the needs assessment process and catered for in the individual's bespoke support plan.</p> <p>This proposal better ensures that peoples protected characteristics are considered by removing the banding system and replacing this with a system which is more in line with the Social Services and Wellbeing (Wales) Act 2014, by looking at the individual circumstances of the carer and cared for person and how their respite needs can be best met.</p> <p>Respite services provide needs-led, person centred support. Therefore the protected characteristics of those to whom the service is delivered and the needs of carers requiring respite are considered as part of the needs assessment process and catered for in the individual's bespoke support plan.</p>
Sexual orientation	X		<p>Access to respite 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 respite is delivered or the level of respite required.</p>

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

The policy's intention is to make access to respite services for unpaid carers to be as fair and equitable as possible for all those with an eligible assessed need. This proposal better ensures that peoples protected characteristics are considered by removing the banding system and replacing this with a system which is more in line with the Social Services and Wellbeing (Wales) Act 2014, by looking at the individual circumstances of the carer and cared for person and how their respite needs can be best met. As such it is not anticipated that this policy will have a negative impact based on a persons protected characteristic. However, the consultation period will enable respondents to highlight any unintended consequences of the policy that could lead to discrimination based on a person's protected characteristic.

The current banding system is not as person centred as this policy as the policy will ensure that people receive the level of respite required for their individual needs.

Furthermore, this policy enables the Council to make best use of its available resources, supporting the Council to be financially sustainable in order to meet the needs and demands of those requiring respite. If the commissioned services are not suitable due to a persons protected characteristic then a direct payment can be offered or where possible an alternative commissioned.

It is acknowledged that some people may receive a reduction in respite if this policy is implemented. Although the reduced allocation would continue to meet the persons need (as the allocation is based on a personalised assessment of a persons need), this may still potentially have a negative impact. To mitigate any potential negative impacts, the policy makes provision to implement a phased approach to any such reduction if required.

In light of the above this policy should overall have a positive impact.

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 provides a framework that helps to ensure a person's individual needs and circumstances are taken into account, rather than a person being allocated into a banding. This is a more equitable system, which supports the Council in meeting its PSED. This policy helps to ensure that carers have a life alongside caring, which supports the Council in meeting its PSED. Respite also enables the cared for person to have social opportunities.
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 potential impact of the proposed Policy on those with eligible care and support needs on PSED has been fully considered and it has been assessed that overall this policy will have a positive impact.

This policy supports carers wellbeing by enabling them to have a break from their caring role. Enabling carers to have a break from their caring role also supports the wellbeing of the cared for person as it helps to reduce carer breakdown, which can result in crisis and the cared for person requiring a long term placement outside of their home (e.g. residential care). Respite provision will help to ensure the Council meets its PSED.

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

4. Community Cohesion/Social Exclusion/Poverty

	+	-	+/-	Why will it have this impact?
Community Cohesion	X			<p>The Policy contributes to the overall aim to “Build Safe and Resilient Communities”, which by definition is intended to have a positive impact on community cohesion in general.</p> <p>Respite will support carers and the cared for to be active members of their communities and socialise with others by enabling them to have a life alongside caring. Therefore this policy will have a positive impact on community cohesion and social exclusion.</p> <p>Any charge for services will be in line with the Councils charging policy, which is compliant with legislation. As such, only those people who can afford to pay for a service will be expected to do so. Therefore, this policy will have a natural impact on poverty as it does not make provision for any changes to the charging of services.</p>
Social Exclusion	X			
Poverty			X	

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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.

As noted above the policy should have a positive or neutral impact. The consultation will enable people to highlight any unintended consequences of the policy that may have a negative impact.

5. 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.

The proposals in the Policy 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.

The Policy is written on the assumption that there will be no further financial or human resources available to Adult Services throughout the life of the Policy 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.

Contracts for commissioned services contain clauses to ensure the provider delivers services in line with the Welsh Language Act.

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	It is not expected that the policy will have any adverse effect on biodiversity or ecosystem resilience.

To promote the resilience of ecosystems, i.e. supporting protection of the wider environment, such as air quality, flood alleviation, etc.			X	
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What action will be taken to improve positive or mitigate negative impacts?

Not applicable.

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	This is one of a range of new policies being consulted on which aim to improve fairness of access to services, as well as 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	The aim of the draft Respite Allocation Policy is to help support unpaid carers to maintain their caring role. Provision of services to prevent carers from developing need for care and support themselves is a Directorate priority. Respite care is one intervention for carers that contributes to preventing, reducing or delaying the need for additional carers support. It also supports

	sustainability of the carer's ability to continue to care and as such helps to prevent crisis and carer breakdown, which can lead to the cared for person requiring statutory support.
iii. Collaboration – working with other services internal or external	The proposal enables us to make best use of our partnerships with those who are commissioned to provide respite services. The policy also enables us to explore alternatives to commissioned respite services when determining how to support a person's respite needs.
iv. Involvement – involving people, ensuring they reflect the diversity of the population	Various staff representatives have been involved in the development of the draft policy and allocation tool, including social workers and managers, Finance, Legal and Audit. The draft policy will be subject, with Members' approval, to a full 90 public consultation to gain public opinion and feedback.
v. Integration – making connections to maximise contribution to:	<p>The aim of the draft Respite Allocation Policy is to help support unpaid carers to maintain their caring role. Respite care is one intervention for carers that contributes to preventing, reducing or delaying the need for additional carers support. It also supports sustainability of the carer 's ability to continue to care and as such helps to prevent crisis and carer breakdown, which can lead to the cared for person requiring statutory support.</p> <p>The draft policy therefore contributes towards the objective of improving the well-being of adults who live in the county borough and to develop the economy.</p>
Council's well-being objectives	<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>
Other public bodies objectives	<p>Create safe, confident and resilient communities, focusing on vulnerable people.</p> <p>Encourage Ageing Well.</p>

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.

Ongoing consideration of equality impact will continue to be given as the Policy is implemented.

Any unintended/unforeseen negative impact on those in receipt of care and support services, identified as part of these processes, will be the subject of further impact assessment.

We will thereby ensure that any emerging unintended/unforeseen negative impact on those who are in receipt of services, which was not previously considered, is acknowledged and acted upon appropriately.

Any such further completed impact assessment will be brought to the attention of Members, as part of the ongoing annual review process recommended in the Policy, to ensure these inform decisions which have had due regard to the Council's legal obligations.

The outcome of any such assessment will be routinely included in the next annual progress report to Members, or reported on sooner if the assessment outcome is significant enough to justify doing so.

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

9. Assessment Conclusions

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

	Conclusion
Equalities	<p>The policy's intention is to make access to respite services for unpaid carers to be as fair and equitable as possible for all those with an eligible assessed need. This proposal better ensures that peoples protected characteristics are considered by removing the banding system and replacing this with a system which is more in line with the Social Services and Wellbeing (Wales) 2014 act, by looking at the individual circumstances of the carer and cared for person and how their respite needs can be best met. As such it is not anticipated that this policy will have a negative impact based on a persons protected characteristic. However, the consultation period will enable respondents to highlight any unintended consequences of the policy that could lead to discrimination based on a person's protected characteristic.</p> <p>The current banding system is not as person centred as this policy as the policy will ensure that people receive the level of respite required for their individual needs.</p> <p>Furthermore, this policy enables the Council to make best use of its available resources, supporting the Council to be financially sustainable in order to meet the needs and demands of those requiring respite. If the commissioned services are not suitable due to a person protected characteristic then a direct payment will be offered or an alternative commissioned.</p> <p>It is acknowledged that some people may receive a reduction in respite if this policy is implemented. Although the reduced allocation would continue to meet the persons need (as the allocation is based on a personalised assessment of a persons need), this may still potentially have a negative impact. To mitigate any potential negative impacts, the policy makes provision to implement a phased approach to any such reduction.</p> <p>In light of the above this policy should overall have a positive impact.</p>

<p>Community Cohesion/ Social Exclusion/Poverty</p>	<p>The potential impact of the proposed Policy on those with eligible care and support needs on PSED, given their various protected characteristics, has been fully considered and it has been assessed that overall this policy will have a positive impact.</p> <p>This policy supports carers wellbeing by enabling them to have a break from their caring role. Enabling carers to have a break from their caring role also supports the wellbeing of the cared for person as it helps to reduce carer breakdown, which can result in crisis and the cared for person requiring a long term placement outside of their home (e.g. residential care). Respite provision will help to ensure the Council meets its PSED.</p> <p>The consultation will enable people to highlight any unintended consequences of the policy that may have a negative impact on PSED.</p> <p>Respite will support carers and the cared for to be active members of their communities and socialise with others by enabling them to have a life alongside caring. Therefore this policy will have a positive impact on community cohesion and social exclusion.</p> <p>Any charge for services will be in line with the Council's charging policy, which is compliant with legislation. As such, only those people who can afford to pay for a service will be expected to do so. Therefore, this policy will have a natural impact on poverty as it does not make provision for any changes to the charging of services.</p>
<p>Welsh</p>	<p>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> <p>The proposals in the Policy 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 Policy is written on the assumption that there will be no further financial or human resources available to Adult Services throughout the life of the Policy and that therefore, sustaining the current</p>

	<p>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> <p>Contracts for commissioned services contain clauses to ensure the provider delivers services in line with the Welsh Language Act.</p>
Biodiversity	The draft policy has no impact on biodiversity.
Well-being of Future Generations	The draft policy contributes to the long term sustainability of service provision.

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

The purpose of the policy is to help protect the county's most vulnerable citizens, including unpaid carers. The policy's intention is to make access to respite services for unpaid carers to be as fair and equitable as possible for all those with an eligible assessed need. It was also ensure long term sustainability of services in line with the Well-being of Future Generations (Wales) Act 2015. With Members' permission, the draft will be subject of a 90 public consultation with a wide range of stakeholders. Should any negative impacts come to light these will be addressed and brought to Members' attention.

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?
Put robust digital systems in place to improve data collection against all protected characteristics.	Head of Adult Services	Annually from 2020	Improved equalities data collection systems are in place.
Undertake an analysis of a comprehensive equalities dataset and include this in annual monitoring reports to Members.	Commissioning Officer - Policy & Strategy	Ongoing	More robust equalities data is included in annual Adult Services monitoring reports.
Continue to promote opportunities for staff to use their Welsh language skills and make available training for those who wish to further develop their skills.	Head of Adult Services	Annually from 2020	There is at least no reduction in the number of staff able to deliver the Council's Adult Services, including Respite, through the medium of the Welsh language. Enable staff to attend Welsh language training.

As the Policy is implemented, complete further EIAs in respect of any emerging unintended/unforeseen impact and include them in annual monitoring reports to Members.	Commissioning Officer - Policy & Strategy	Annually from 2020	The overall impact of the Policy on all those receiving care and support from Adult Services remains positive.
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11. Sign off

	Name	Position	Signature	Date
Completed by	Andrew Potts	Commissioning Officer		15 th May 2019
Signed off by	Angela Thomas	Head of Service/Director		