

## Impact Assessment - First Stage

It is essential that all initiatives undergo a first stage impact assessment to identify relevance to equalities and the Welsh language as well as an evaluation of how the proposal has taken into account the sustainable development principle (the five ways of working); an incorrect assessment could ultimately be open to legal challenge.

The first stage is to carry out a short assessment to help determine the need to undertake a more in-depth analysis (the second stage).

Relevance will depend not only on the number of people/service users affected, but also the significance of the effect on them.

When completing the first step you must have regard to the following:

- Does the initiative relate to an area where important equality issues have been, or are likely to be, raised? (For example, funding for services to assist people who are victims of rape/sexual violence or individuals with particular care need; disabled people's access to public transport; the gender pay gap; racist or homophobic bullying in schools)
- Is there a significant potential for reducing inequalities, or improving outcomes? (For example, increasing recruitment opportunities for disabled people).
- Does the initiative relate to instances where opportunities to use the Welsh language are likely to be affected or where the language is likely to be treated less favourably? (For example, increase the number of Welsh speakers moving from/to a certain area; closing specific Welsh language services or put those services at risk services;
- Does the initiative relate to the improvement of economic, social, environmental and cultural well-being? To what extent does the initiative prevent things getting worse? (For example, funding for services to assist in cultural well-being; changes in policies that promote independence and/or assist carers)

### 1. Provide a description and summary of the initiative.

Identify which service area and directorate has responsibility for the initiative.

### 2. Identify who will be affected by the initiative.

If you answer **Yes** to service users, staff or wider community continue with the first stage of the assessment

If you answer **No** to service users, staff or wider community or **Yes** to 'Internal administrative process only', go to **Question 5 – sustainable development principle**.

### 3. Using relevant and appropriate information and data that is available to you think about what impact there could be on people who share protected characteristics; whether they are service users, staff or the wider community.

Some things to consider include:

- transport issues
- accessibility
- customer service
- cultural sensitivity
- financial implications
- loss of jobs

Definitions of impacts (either positive or negative):

- High – likely to be highly affected by the initiative
- Medium - likely to be affected in some way
- Low - likely to be affected by the initiative in a small way
- Don't know - the potential impact is unknown

You **must** provide reasons, and indicate what evidence you used, in coming to your decision.

4. Using relevant and appropriate information and data that is available, think about what impact there could be on opportunities to use the Welsh language and in treating the language no less favourably than English.

Definitions of impacts are the same as in **Question 3**.

The classification 'Don't Know' should be categorised as 'High Impact' in both questions 3 & 4.

5. Consider how the initiative has embraced the sustainable development principle in accordance with the Section 7c of the Well-being of Future Generations Act 2015.

Give details of the initiative in relation to the 5 ways of working:

- **Long term** - how the initiative supports the long term well-being of people
- **Integration** - how the initiative impacts upon our wellbeing objectives
- **Involvement** - how people have been involved in developing the initiative
- **Collaboration** - how we have worked with other services/organisations to find shared sustainable solutions;
- **Prevention** - how the initiative will prevent problems occurring or getting worse

6. The most appropriate statement must be selected (and the relevant box ticked) based on the first stage of the assessment and an explanation of how you have arrived at this decision must be given.

In addition a summary of the how the initiative has embraced the sustainable development principle must also be included.

Where the first stage of the assessment indicates that a more in-depth analysis is required the second stage of the assessment will need to be completed and this will need to be started immediately.

A first stage assessment must be included as a background paper for all Cabinet/Cabinet Board/ Scrutiny Committee Reports.

Where the first stage assessment is completed by an accountable manager it must be signed off by a Head of Service/Director.

## Impact Assessment - First Stage

### 1. Details of the initiative

<b>Initiative description and summary:</b> Adult Services Debt Management and Recovery Policy
<b>Service Area:</b> Adult Services
<b>Directorate:</b> Social Services, Health & Housing

### 2. Does the initiative affect:

	Yes	No
Service users	X	
Staff		X
Wider community	X	
Internal administrative process only		X

### 3. Does the initiative impact on people because of their:

	Yes	No	None/ Negligible	Don't Know	Impact H/M/L	Reasons for your decision (including evidence)/How might it impact?
Age	X				H	By definition, the provision of social care is to meet a need which is age and/or disability related. As such, where debts have been accrued it is these groups which are most likely to be impacted by this policy. The stress of having debt can have an impact on someone particularly due to their age / disability (especially for those with mental health issues), etc. The policy can help alleviate this by providing clarity of process and helping to identify non-payment and its causes at an earlier stage.
Disability	X				H	

Gender Reassignment		X			L	It is unlikely that a debt will have been accrued solely due to a person's gender identity, and it is unlikely that personal circumstances relating to a person's gender identity will have an impact on how debt recovery is sought. The policy takes account of the need to investigate reasons as to why payments have not been made. Furthermore, under the Council's Residential and Non-Residential Care Charging Policy, people will only be required to pay what they can afford in accordance with regulations under the Social Service and Well-being (Wales) Act 2014.
Marriage/Civil Partnership	X				M	There may be instances where debt relating to a service user's care package has been deliberately accrued by a partner or family member of the service user. The policy takes account of the need to investigate reasons as to why payments have not been made, which may include safeguarding of a service user relating to their own family members. Furthermore, under the Council's Residential and Non-Residential Care Charging Policy, people will only be required to pay what they can afford in accordance with regulations under the Social Service and Well-being (Wales) Act 2014.
Pregnancy/Maternity	X				M	It is theoretically possible that an individual service user's financial circumstances will have changed due to pregnancy. The policy takes account of the need to investigate reasons as to why payments have not been made. Furthermore, under the Council's Residential and Non-Residential Care Charging Policy, people will only be required to pay what they can afford in accordance with regulations under the Social Service and Well-being (Wales) Act 2014.
Race		X			L	Access to social care and support is unlikely to be solely due to a person's race. The policy takes account of the need to investigate reasons as to why payments have

						not been made. Furthermore, under the Council's Residential and Non-Residential Care Charging Policy, people will only be required to pay what they can afford in accordance with regulations under the Social Service and Well-being (Wales) Act 2014.
Religion/Belief		X			L	Access to social care and support is unlikely to be solely due to a person's religion/belief. The policy takes account of the need to investigate reasons as to why payments have not been made. Furthermore, under the Council's Residential and Non-Residential Care Charging Policy, people will only be required to pay what they can afford in accordance with regulations under the Social Service and Well-being (Wales) Act 2014.
Sex		X			L	Access to care and support is unlikely to be solely due to a person's sex, and it is unlikely that personal circumstances relating to a person's sex will have an impact on how debt has arisen and how debt recovery is sought. However, the policy takes account of the need to investigate reasons as to why payments have not been made. Furthermore, under the Council's Residential and Non-Residential Care Charging Policy, people will only be required to pay what they can afford in accordance with regulations under the Social Service and Well-being (Wales) Act 2014.
Sexual orientation		X			L	Access to care and support is unlikely to be solely due to a person's sexual orientation, and it is unlikely that personal circumstances relating to a person's sexual orientation will have an impact on how debt has arisen and how debt recovery is sought. However, the policy takes account of the need to investigate reasons as to why payments have not been made. Furthermore, under the Council's Residential and Non-Residential Care Charging Policy, people will only be required to pay what

						they can afford in accordance with regulations under the Social Service and Well-being (Wales) Act 2014.
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**4. Does the initiative impact on:**

	Yes	No	None/ Negligible	Don't know	Impact H/M/L	Reasons for your decision (including evidence used) / How might it impact?
People's opportunities to use the Welsh language		X			L	The Council will continue to offer services in Welsh and English. Where the recovery of debt is sought, the medium of Welsh or English will be used as appropriate to the individual(s) concerned.
Treating the Welsh language no less favourably than English		X			L	

**5. Does the initiative impact on biodiversity:**

	Yes	No	None/ Negligible	Don't know	Impact H/M/L	Reasons for your decision (including evidence) / How might it impact?
To maintain and enhance biodiversity		X			L	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,		X			L	

such as air quality, flood alleviation, etc.						
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**6. Does the initiative embrace the sustainable development principle (5 ways of working):**

	Yes	No	Details
<b>Long term</b> - how the initiative supports the long term well-being of people	X		This policy aims to promote 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. It provides a framework for the investigation of reason(s) why a debt has accrued and to seek recovery where applicable/possible. Prudent management of Council funds and greater financial stability will help the long term sustainability of services which can lead to improved wellbeing of more citizens.
<b>Integration</b> - how the initiative impacts upon our wellbeing objectives	X		This policy aims to seek the repayment of debts accrued by service users who have been assessed as able to pay for services but have refused to do so. Reclaiming outstanding monies will help towards the long term sustainability of adult services, which will help the Directorate and the Council to meet its objective of providing care and support services which improve the well-being of adults living in the county borough.
<b>Involvement</b> - how people have been involved in developing the initiative	X		Various staff representatives have been involved in the development of the policy, including managers, Finance and Legal.
<b>Collaboration</b> - how we have worked with other services/organisations to find shared sustainable solutions	X		Development and implementation of the policy has and will require collaborative work between Social Services, Finance and Legal Services.
<b>Prevention</b> - how the initiative will	X		The policy provides a framework for the investigation of reason(s) why a



prevent problems occurring or getting worse			debt has accrued and to seek recovery where applicable/possible. By dealing more promptly with individual situations it is expected that the reduction or prevention of adult social care debt will be improved.
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**7. Declaration - based on above assessment (tick as appropriate):**

A full impact assessment (second stage) <b>is not</b> required	
Reasons for this conclusion	

A full impact assessment (second stage) <b>is</b> required	X
Reasons for this conclusion	
The policy seeks to prevent debt from arising in the first place, reduce its occurrence and recover monies wherever possible. By definition this will mean dealing with people who may be vulnerable. Whilst it is not anticipated that the policy will have an adverse effect, it is judged only right and proper to conduct a full impact assessment.	

	Name	Position	Signature	Date
Completed by	Andrew Potts	Commissioning Officer		2 <sup>nd</sup> August 2019
Signed off by	Angela Thomas	Head of Service/Director		