# **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	Andrew Potts	Commissioning Officer	7 <sup>th</sup> August 2019

#### 1. Details of the initiative

	Title of the Initiative: Fairness of Service Provision Policy
1a	Service Area: Adult Services
1b	Directorate: Social Services, Health & Housing
1c	<b>Summary of the initiative:</b> When undertaking an assessment or reassessment of individuals' needs, the Council will take into account the social care resources available to it when considering how to meet those needs.
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? A 90 day consultation was conducted consisting of: letters to over 1,800 clients who could be affected by the policy; the policy, easy read and consultation feedback documents (in English and Welsh) distributed across day and respite services, civic centres and partner organisations; all documents available via the

	Council's website (in English and Welsh); consultation events held at Trem Y Mor Day Service and Bspoked Enterprises on 22 <sup>nd</sup> May 2019; press release; Council social media (Facebook / Twitter); briefings of staff at team meetings.
1f	What were the outcomes of the consultation? See Appendix 4.

### 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 Services:

Age group	Female	Male	Total
<20	1	16	17
20s	45	71	116
30s	49	33	82
40s	59	39	98
50s	94	67	161
60s	124	113	237
70s	404	186	590
80s	953	315	1268
90+	428	127	555
Total	2157	967	3124

		Age Group								
Ethnicity	<20	<b>20</b> s	30s	40s	50s	60s	70s	80s	90+	Total
BANGLADESHI						1				1
BLACK AFRICAN								1		1
BLACK CARIBBEAN							1			1
CHINESE								1		1
INDIAN							1			1
OTHER			1		2	1		2	4	10
OTHER ASIAN								2		2
OTHER BLACK					1	1	3	2	1	8
OTHER MIXED		1								1
PAKISTANI								1		1
WELSH	2	17	9	11	34	79	201	455	220	1028
WHITE BRITISH	15	95	62	78	95	130	278	567	256	1576
WHITE IRISH						2	1	7	2	12
WHITE OTHER			1			1		3	1	6
WHITE/SCOTTISH							2			2
NOT STATED		3	9	9	29	22	103	227	71	473
<b>Grand Total</b>	17	116	82	98	161	237	590	1268	555	3124

		Age Group									
Marital Status	<20	<b>20</b> s	<b>30</b> s	40s	50s	60s	70s	80s	90+	Total	
DIVORCED				7	16	45	46	45	6	165	
MARRIED			4	8	49	71	197	339	75	743	
NOT DISCLOSED					1	3				4	
PARTNERS			1	2	2	6	6	5	1	23	
SEPARATED				5	6	7	10	6	1	35	
SINGLE	4	76	71	68	66	61	54	48	17	465	
WIDOWED				1	2	30	200	686	391	1310	
NOT STATED	13	40	6	7	19	14	77	139	64	379	
<b>Grand Total</b>	17	116	82	98	161	237	590	1268	555	3124	

		Age Group								
<b>Disability Group</b>	<20	<b>20</b> s	30s	40s	50s	60s	<b>70</b> s	80s	90+	Total
DEMENTIA						1	1	7	2	11
ELDERLY					1	2	47	87	37	174
LEARN.DIFF.	8	86	45	47	30	23	9	3	1	252
MENTAL			1	5	8	5	5	4		28
OTHER VULN.						1	1	1	1	4
PHYSICAL	3	18	24	24	46	85	149	304	214	867
NOT STATED	6	12	12	22	76	120	378	862	300	1788
<b>Grand Total</b>	17	116	82	98	161	237	590	1268	555	3124

The following information was obtained from responses to the public consultation:

### **About the respondents**

Of the 9 responses:

- 2 (25%) stated that they are service users
- 3 (38%) stated that they are a carer for a service user
- 4 (50%) stated that they are a member of staff at a service

(NB. for this question respondents were asked to select all of the categories that applied to them, some selected more than one answer; therefore the percentages in brackets total more than 100%).

### Age

Age range (years)	Number	% of respondents
16 - 24	-	-
25 – 29	2	25%
30 - 39	1	13%
40 - 49	-	-
50 – 59	1	13%
60 – 74	2	25%
75 – 85	-	-
Prefer not to say	2	25%
Total	8	100%

#### Gender

4 (50%) respondents were female, 2 (25%) male and 2 (25%) preferred not to say.

### **Nationality**

3 (38%) respondents described their nationality as Welsh, 2 (25%) as British, 1 (13%) as English and 2 (25%) preferred not to say.

### **Ethnic origin**

5 (63%) respondents described their ethnicity as White British, 1 (13%) as Indian and 2 (25%) preferred not to say.

#### **Sexual orientation**

5 (71%) respondents described themselves as heterosexual, and 2 (29%) preferred not to say.

### Disability

3 (38%) respondents reported having a disability with 3 (38%) stating that they did not have a disability and 2 (25%) preferring not to say.

## Welsh Language

5 (63%) respondents reported having little or no knowledge of the Welsh language, while 3 (38%) reported as being Welsh learners.

#### Religion

2 (29%) respondents reported as being Christian, 1, (14%) stated any other religion, 1 (14%) preferred not to say and 3 (43%) respondents reported as having no religion/beliefs.

The consultation did not highlight that the proposals would lead to discrimination based on a person's protected characteristics.

The outcome of the policy is to ensure that our limited resources are directed to those whose needs can only be met through social services interventions. This policy ensures sustainability, transparency and equitability. As such, the benefits of implementing the policy outweigh any perceived negative impact such as reduction in choice and control.

# 3. Equalities

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

Protected Characteristic	+	-	+/-	Why will it have this impact?
				Data shows that a high number of people receiving adult services care and support have a protected characteristic by virtue of their age.
				Adult 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 care and support are considered as part of the needs assessment process and catered for in the individual's bespoke care and support plan.
				When commissioning services, the Council will make a determination as to what interventions can best meet the person's identified assessed needs and agreed desired outcomes in a way that is equitable and sustainable, whilst offering maximum choice and control possible in regards to the care they receive.
Age			X	Assessment of need will take into account various protected characteristics including age and disability.
				Although the policy will mainly effect people with a disability or age related frailty, there is no evidence that the policy would lead to discrimination. Some people may feel that there is a reduction in choice as the council will need to take into account if their needs can be met in a more cost effective way. However, all people will be offered a choice from a range of interventions including Direct Payments. In addition, people will be able to contribute to a more expensive provision, which gives more choice to those that wish and can use their own resources.
				Those people with more limited resources may not benefit from this element of the proposal and there may be a perception that they have less choice and control or

		see a negative impact to their finances. However, people will only be required to contribute towards the cost of meeting their eligible care needs what they are assessed as being able to as this policy does not change the Council's Fairer Charging Policy and all people will be able to contribute to their assessment and have a choice of interventions that can meet their identified eligible needs.  This policy will not change the council's obligations to ensure people's eligible needs
		are met. The Council is not, however, bound to meet a need in the way preferred by an individual, particularly where the cost of that preferred way is higher than other reasonable ways.
		Some people may see a change to services following a review and this may be perceived by those receiving services and their family/carers as having a negative impact. However, any change will be planned with the person. Changes are not necessarily as a result of this policy as reviews take place to assess changes in need. All people will continue to receive services that meet eligible needs and be given choice, and their views and individual circumstances will be taken account of when determining the options available to the person/family/carer to meet their eligible needs.
		Data shows that a high number of people receiving adult services care and support have a protected characteristic by virtue of their disability.
Disability	x	Adult 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 care and support are considered as part of the needs assessment process and catered for in the individual's bespoke care and support plan.
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	Access to adult services is unlikely to be solely due to a person's gender identity. However, personal circumstances relating to a person's gender identity may have an impact on how services are delivered.
	Adult 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 care and support are considered as part of the needs assessment process and catered for in the individual's bespoke care and support plan.
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			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.
			Adult 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 care and support are considered as part of the needs assessment process and catered for in the individual's bespoke care and support plan.
Marriage & civil partnership	X	When commissioning services, the Council will make a determination as to what interventions can best meet the person's identified assessed needs and agreed desired outcomes in a way that is equitable and sustainable, whilst offering maximum choice and control in regards to the care they receive.	
			Eligibility criteria when undertaking an assessment or reassessment of a person's care and support needs take into account individual circumstances of the carer and the cared for person in order to ensure that 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, where applicable, are considered as

part of the needs assessment process and catered for in the individual's bespoke care and support plan.

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Pregnancy and maternity	X	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 care and support needs.  Adult 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 care and support are considered as part of the needs assessment process and catered for in the individual's bespoke care and support plan.  Eligibility criteria when undertaking an assessment or reassessment of a person's care and support needs take into account individual circumstances of the carer and the cared for person in order to ensure that 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, where applicable, are considered as part of the needs assessment process and catered for in the individual's bespoke care and support plan.  When commissioning services, the Council will make a determination as to what interventions can best meet the person's identified assessed needs and agreed desired outcomes in a way that is equitable and sustainable, whilst offering maximum choice and control in regards to the care they receive.  Eligibility criteria when undertaking an assessment or reassessment of a person's care and support needs take into account individual circumstances of the carer and the cared for person in order to ensure that 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, where applicable, are considered as part of the needs assessment process and catered for in the individual's bespoke care and support plan.
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Race	x	Access to adult services care and support is unlikely to be solely due to a person's race. However, personal circumstances relating to a person's race may have an impact on how services are delivered.

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		Access to adult services care and support is unlikely to be solely due to a person's religion or belief. However, personal circumstances relating to a person's religion or belief may have an impact on how services are delivered.
Religion or belief	x	Adult 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 care and support are considered as part of the needs assessment process and catered for in the individual's bespoke care and support plan.
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		given choice, and their views and individual circumstances will be taken account of when determining the options available to the person/family/carer to meet their eligible needs.
		Access to adult services care and support is unlikely to be solely due to a person's sex. However, personal circumstances relating to a person's sex may have an impact on how services are delivered
		Adult 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 care and support are considered as part of the needs assessment process and catered for in the individual's bespoke care and support plan.
		When commissioning services, the Council will make a determination as to what interventions can best meet the person's identified assessed needs and agreed desired outcomes in a way that is equitable and sustainable, whilst offering maximum choice and control in regards to the care they receive.
Sex	X	Eligibility criteria when undertaking an assessment or reassessment of a person's care and support needs take into account individual circumstances of the carer and the cared for person in order to ensure that 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, where applicable, are considered as part of the needs assessment process and catered for in the individual's bespoke care and support plan.
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Sexual orientation	<b>)</b>	Access to adult services care and support is unlikely to be solely due to a person's sexual orientation. However, personal circumstances relating to a person's sexual orientation may have an impact on how services are delivered.  Adult 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 care and support are considered as part of the needs assessment process and catered for in the individual's bespoke care and support plan.

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This policy will not change the council's obligations to ensure people's eligible needs are met. The Council is not, however, bound to meet a need in the way preferred by

í	an individual,	particularly	where th	e cost	of that	preferred	way is	s higher	than	other
r	reasonable wa	ays.								

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

The policy's intention is to take the Council's resources into account when assessing an individual's care and support needs to ensure services are provided on a fair and equitable basis as far as possible for all those with an eligible assessed need.

In each case where there is an assessed eligible need, the individual will be offered a care and support package or offered Direct Payments if eligible of a similar amount to be able to meet that need. Social care and support will continue to be met but anything over and above this would be expected to be funded by the individual.

All protected characteristics will be considered in line with the Social Services and Wellbeing (Wales) Act 2014, by looking at the individual circumstances of the individual - and carer(s) where applicable - and how their care and support 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.

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 care and support. If the commissioned services are not suitable due to a persons protected characteristic then a direct payment can be offered where eligible or where possible an alternative commissioned.

It is acknowledged that some people may receive a change in service provision if this policy is implemented. Although the provision would continue to meet the person's needs as identified through an individual personalised assessment, an individual may perceive this as having a negative impact.

However, it should also be acknowledged that the level of care and support being received by an individual may increase. In all cases the person will be offered a care and support package proportionate to their individual needs.

By taking account of all available resources it is expected that care and support will continue to be available to a greater number of the most vulnerable citizens.

In light of the above this policy should overall have a neutral 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	This policy supports the council in taking forward its statutory duties with regards to adult social services, which further it in discharging its Public Sector duties.
To advance equality of opportunity between different groups			X	addit social services, which further it in discharging its r ubile occior daties.
To foster good relations between different groups			Х	

# 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 neutral impact.

This policy supports provision of care and support tailored to meet individual's assessed needs.

### 4. Community Cohesion/Social Exclusion/Poverty

	+	-	+/-	Why will it have this impact?					
Community Cohesion			Х	The Policy may affect those without sufficient financial resources of their own, who may have less choice and control over the care package they receive than someone who is more financially able.					
Social Exclusion			X						
Poverty			Х	However, we will be ensuring that service users maximise their income by promoting the uptake of benefits to which they are entitled, including Attendance Allowance, mobility element of Disability Living Allowance / Personal Independence Payments, etc.					
				It must be emphasised that any services received will meet the eligible assessed needs of, and agreed desired outcomes for, the individual and that the individual will have choice in regards to those services that are in line with what the Council has					

agreed can meet the person's needs, whilst taking into account the Council's available resources

This policy does not change the Council's Fairer Charging Policy. As such, people will only be required to contribute what they are assessed as being able to afford in regards to having their eligible needs met. All people will be offered a service that meets eligible needs.

Overall this policy should have a neutral impact as it will support the Council in ensuring that they are financially sustainable in order to be able to continue meeting ongoing demand for services, including community based services.

### 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 neutral impact.

People will be supported to maximise their income, and all people will continue to have their needs met and have a choice in how their needs will be met

#### 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	
To promote the resilience of ecosystems, i.e. supporting protection of the wider environment, such as air quality, flood alleviation, etc.			X	It is not expected that the policy will have any adverse effect on biodiversity or ecosystem resilience.

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?

W	ays 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 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	Tailoring services to individual's needs will help improve independence and prevent or reduce the need for more complex care.
iii.	Collaboration – working with other services internal or external	The proposal enables us to make best use of our partnerships with those who are commissioned to provide services. The policy also enables us to explore alternatives to commissioned services when determining how to support a person's assessed 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, including social workers and managers, Finance, Legal and Audit.  The draft policy was subject of a full 90 day public consultation to gain stakeholder opinion and feedback.
v.	Integration – making connections to maximise contribution to:	The aim of the Fairness of Service Provision Policy is to meet individual's assessed needs either through a directly commissioned care package or via the use of Direct Payments. By requesting service users to pay for any care and support they want over and above that which meets their identified need, or is in excess of the reasonable cost of meeting their needs, the Policy contributes towards the objective of improving the well-being of adults who live in the county borough, and the long term sustainability of services.
1	ouncil's well-being ojectives	To improve the well-being of all adults who live in the county borough.  To develop the economy and the environment so that the well-being of people can be improved.

Other public bodies objectives	Create safe, confident and resilient communities, focusing on vulnerable people. Encourage Ageing Well.	
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### 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. This will be monitored through the complaints process, information from social worker reviews and contract monitoring.

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 to understand opportunity to mitigate wherever possible.

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 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.

### 9. Assessment Conclusions

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

	Conclusion
Equalities	The policy's intention is to make access to services to be as fair and equitable as possible for all those with an eligible assessed need. The policy ensures that people's protected characteristics are considered in line with the Social Services and Wellbeing (Wales) 2014 act, by looking at the individual circumstances of the individual – and carer(s) where applicable - and how their needs can be best met. As such it is not anticipated that this policy will have a negative impact based on a person's protected characteristics.
	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 care and support. If the commissioned services are not suitable due to a person's protected characteristic then a direct payment will be offered, where eligible, or an alternative commissioned.
	It is acknowledged that some people may receive a change in service provision if this policy is implemented. Although the provision would continue to meet the person's needs as identified through an individual personalised assessment, an individual may perceive this as having a negative impact.
	However, it should also be acknowledged that the level of care and support being received by an individual may increase.
	In all cases the person will be offered a care and support package proportionate to their individual needs.
	By taking account of resources it is expected that care and support will continue to be available to a greater number of the most vulnerable citizens.
	When commissioning services, the Council will make a determination as to what interventions can best meet the person's identified assessed needs and agreed desired outcomes in a way that is

equitable and sustainable, whilst offering maximum choice and control possible in regards to the care they receive.

The assessment of need will take into account various protected characteristics including age and disability.

Although the policy will mainly effect people with a disability or age related frailty, there is no evidence that the policy would lead to discrimination. Some people may feel that there is a reduction in choice as the council will need to take into account if their needs can be met in a more cost effective way. However, all people will be offered a choice from a range of interventions including Direct Payments. In addition, people will be able to contribute to a more expensive provision, which gives more choice to those that wish and can use their own resources.

Those people with more limited resources may not benefit from this element of the proposal and there may be a perception that they have less choice and control or see a negative impact to their finances. However, people will only be required to contribute what they are assessed as being able to as this policy does not change the Council's Fairer Charging Policy and all people will be able to contribute to their assessment and have a choice of interventions that can meet their identified eligible needs.

There is no discrimination on the grounds of a persons protected characteristics in terms of age and disability because this policy does not treat people with a protected characteristic less favourably than those with a protected characteristic. Rather, it ensures equitability and transparency between all people requiring intervention from Adult Social Services.

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

# Community Cohesion/ Social Exclusion/Poverty

The Policy may affect those without sufficient financial resources of their own, who may have less choice and control over the care package they receive than someone who is more financially able.

However, we will be ensuring that service users maximise their income by promoting the uptake of benefits to which they are entitled, including Attendance Allowance, mobility element of Disability Living Allowance / Personal Independence Payments, etc.

It must be emphasised that any services received will meet the eligible assessed needs of, and agreed desired outcomes for, the individual and that the individual will have choice in regards to those services that are in line with what the Council has agreed can meet the person's needs, whilst taking into account the Council's available resources

This policy does not change the Council's Fairer Charging Policy. As such, people will only be required to contribute what they are assessed as being able to afford in regards to having their eligible needs met. All people will be offered a service that meets eligible needs.

Overall this policy should have a neutral impact as it will support the Council in ensuring that they are financially sustainable in order to be able to continue meeting ongoing demand for services, including community based services.

#### Welsh

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

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.

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	$\boxtimes$
•	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 services for individuals 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.

This is one of a range of new policies 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 to meet the outcomes of a growing population with adult social care needs.

### 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.
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 through the medium of the Welsh language.  Enable staff to attend Welsh language training.
As the Policy is implemented, complete further IIAs 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.

# 11. Sign off

	Name	Position	Signature	Date
Completed by	Andrew Potts	Commissioning Officer		7 <sup>th</sup> August 2019
Signed off by	Angela Thomas	Head of Service/Director		