

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	Chele Zandra Howard	PO Commissioning	06.10.20

1. Details of the initiative

	Title of the Initiative: Implementation of service provision measures in response to COVID-19
1a	Service Area: Adult Services
1b	Directorate: Social Services Health and Housing
1c	Summary of the initiative: Measures that have been assessed as needing to be implemented in response to the 'local lockdown', increased rates of community transmission and guidance from WG and PHW, which have an impact on normal service provision
1d	Who will be directly affected by this initiative? <ul style="list-style-type: none">• People that live in care homes within the Neath Port Talbot unitary area• People that receive day services or have a direct payment for day services• People that live in supported living schemes in the Neath Port Talbot unitary area• People that have respite in Trem-y-Mor
1e	When and how were people consulted?

	No consultation has taken place due to the emergency nature of these measures.
1f	What were the outcomes of the consultation?

2. Evidence

What evidence was used in assessing the initiative?
<ul style="list-style-type: none"> • Local COVID-19 transmission rates • PHW guidance on infection control • WG COVID-19 guidance • PHW information on COVID-19 outbreaks in services • TTP information on numbers of staff or service users tested positive within a service or required to isolate as a result of contact tracing • Information on care assessments of people in receipt of impacted services

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><u>Care Homes</u></p> <p>Restrictions on in-door care home visits may have a negative impact on a person's wellbeing. There is a local restriction on all people receiving in-door visits and as such this does not lead to discrimination based on age – however it is acknowledged that there could be additional impacts on a person's wellbeing due to their age.</p> <p>There is a need to carefully balance the impact on a person's wellbeing and human rights with the risks of COVID-19 transmission, in particular the known additional risks of people in the higher age category and in care homes.</p> <p>Although restrictions on indoor visits will have a negative impact on people due to their age, the current risks associated with the current community transmission rates of COVID-19 outweigh these negative impacts.</p> <p>The decision to restrict in-door care home visits will be reviewed weekly and a risk assessment tool is being developed. Care homes have been asked to ensure that people can receive in-door visits in situations such as end of life care. Outdoor visits are able to take place if the care home assesses this to be safe.</p> <p>We have asked all care homes to undertake a risk assessment on enabling outdoor visits and visits in exceptional circumstances to help reduce the risk of COVID-19 transmission.</p> <p>There is regular correspondence between care homes and Environmental Health with regards to their infection control measures and the Council supplies care homes with PPE.</p> <p>Officers receive daily information on the numbers of staff or service users that have tested positive, which helps inform an understanding of risks associated with community transmission in the services.</p>
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			<p>A regional bid for grant funding has been made to purchase iPad for the care homes to enable residents to keep in touch with their friends and family.</p> <p>Care homes have processes in place to support residents keep in touch with friends and family.</p> <p><u>Day services, Direct Payments and Supported Living</u> People receiving these services are across the spectrum of age groups and will not experience a more negative impact due to their age.</p>
Disability		x	<p><u>Care Homes</u> By the nature of care homes, people will have a disability or old age frailty. There is a local restriction on all people receiving in-door visits and as such this does not lead to discrimination based on disability – however it is acknowledged that there could be additional impacts on a person’s wellbeing due to their disability.</p> <p>There is a need to carefully balance the impact on a person’s wellbeing and human rights with the risks of COVID-19 transmission, in particular the known additional risks of people with certain medical needs or disabilities and in care homes.</p> <p>Although restrictions on indoor visits will have a negative impact on people due to their disability, the current risks associated with the current community transmission rates of COVID-19 outweigh these negative impacts.</p> <p>The decision to restrict in-door care home visits will be reviewed weekly and a risk assessment tool is being developed. Care homes have been asked to ensure that people can receive in-door visits in situations such as end of life care. Outdoor visits are able to take place if the care home assesses this to be safe.</p>

			<p>We have asked all care homes to undertake a risk assessment on enabling outdoor visits and visits in exceptional circumstances to help reduce the risk of COVID-19 transmission.</p> <p>There is regular correspondence between care homes and Environmental Health with regards to their infection control measures and the Council supplies care homes with PPE.</p> <p>A regional bid for grant funding has been made to purchase iPads for the care homes to enable residents to keep in touch with their friends and family.</p> <p>Care homes have processes in place to support residents keep in touch with friends and family.</p> <p>Officers receive daily information on the numbers of staff or service users that have tested positive, which helps inform an understanding of risks associated with community transmission.</p> <p><u>Supported Living</u></p> <p>By the nature of the services all people residing in a supported living scheme will have a disability. Although restrictions on indoor visits applies equally to all people in Neath Port Talbot, a person's disability may result in this having more of a negative impact.</p> <p>There is a need to carefully balance the impact on a person's wellbeing and human rights with the risks of COVID-19 transmission, in particular the known additional risks of people with certain medical needs or disabilities and when people are in contact with other people.</p>
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			<p>Although restrictions on indoor visits will have a negative impact on people due to their disability, the current risks associated with the current community transmission rates of COVID-19 outweigh these negative impacts.</p> <p>Where it is assessed that a person residing in a Supported Living Scheme needs to continue with their usual indoor visitation due to the overwhelming negative impact it would have on their wellbeing, this will be facilitated. In these situations, the support provider will be required to develop a dynamic risk assessment that takes into account how to minimise the risk of COVID-19 entering the Supported Living Scheme.</p> <p>Outdoor visits can continue to take place and service providers have been asked to develop risk assessments to reduce the risk of COVID-19 transmission.</p> <p>A workshop with service providers, Public Health Wales and Environmental Health has been arranged to help support providers understand how they can improve their infection control plans.</p> <p>PPE is supplied to providers.</p> <p>Service Providers are supporting residents to facilitate contact with family and friends through other means, such as Skype, etc. Welsh Government made funding available at the beginning of the pandemic for support providers to purchase IT equipment, etc., to help ensure that people in supported living could keep connections with other people when in lockdown.</p> <p>Officers receive daily information on the numbers of staff or service users that have tested positive, which helps inform an understanding of risks associated with community transmission.</p>
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			<p>In-door visitation will be reviewed in light of any changes to the local lockdown resections.</p> <p><u>Day Services and Trem-y-Mor Respite</u></p> <p>By the nature of the services all people receiving a day service/respice will have a disability.</p> <p>In order to ensure that people attending day services/respice are able to socially distance, there is a need to limit the number of people within a service. This means that some people will not receive their normal level of day service/respice, which will result in this measure having a negative impact on a person due to their disability. For some people an assessment may determine that they are not able to currently receive a day service/respice. This will result in the measure having a negative impact on a person due to their disability.</p> <p>It is also acknowledged that day services are can be a form of respice for families that provide unpaid care to someone with a disability. Respite and day services are important in helping unpaid carers maintain their caring roles and any reductions/removal in service could lead to carer breakdown. Carer breakdown may have a negative impact on someone with a disability as they may need to be moved into a placement, which would result in a change to their usual care and family life.</p> <p>There is a need to carefully balance the impact on a person’s wellbeing and human rights with the risks of COVID-19 transmission, in particular the known additional risks of people with certain medical needs or disabilities and when people are in contact with other people.</p> <p>Although reductions in day services/respice will have a negative impact on people due to their disability, the current risks associated with the current community transmission rates of COVID-19 outweigh these negative impacts.</p>
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			<p>For some people an assessment may determine that they are not able to currently receive a day service/respice, although this will have a negative impact on the person due to their disability, the current risks associated with the current community transmission rates of COVID-19 outweigh these negative impacts.</p> <p>People that have capacity to make decisions around attending day services will be free to make a determination whether they wish to continue attending day services. We have issued a letter to people reminding them to think carefully about the risks of attending a day service. However in reality, a large number of people receiving a day service will be assessed as not having sufficient mental capacity to make this decision.</p> <p>Where a person does not have capacity, a Best Interest Decision will be undertaken to determine whether it is in a person's best interest to continue receiving a day service/respice and if so what level of service they can receive. This decision making process takes into account factors such as:</p> <ul style="list-style-type: none">• the potential risks associated with the current COVID-19 infection rates;• individual personal factors that may place a person at risk of developing more serious symptoms if they come into contact with the COVID-19 virus;• the impact of not receiving a service on their wellbeing;• the impact on the carer and potential of carer breakdown;• the reasonable measures that can be implemented by the service to reduce the likelihood of transmission in the service and the impact on a person's health and wellbeing if they are unable to receive a service. <p>The decision as to whether attending a day service/respice continues to be in a person's best interest will be continually reviewed in line with changes to community transmission rates and a person individual needs.</p> <p>Regular contact will be made with those that experience a reduction or temporary suspension of services to assess how they are managing with the situation.</p>
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			<p>The council has worked with providers to ensure that infection control measures are in place, however it is acknowledged that it is not possible to ensure that a day service/respice is completely risk free with regards to COVID-19 transmission. However at this point in time it has been assessed that the risks of shutting day services for all people outweighs the risks of COVID-19 transmission.</p> <p>There will be regular reviews of the COVID-19 community transmission rates in order to assess whether the risks of continuing to provide day services outweighs the risks of closing day services. These assessments will also consider if it is possible to allow more people to attend day service/respice.</p> <p><u>Direct Payments</u></p> <p>There is no changes to direct payment provision so there is neutral impact. We have issued a letter to people reminding them to think carefully about the risks of attending a day service.</p>
Gender reassignment		x	
Marriage & civil partnership		x	
Pregnancy and maternity		x	
Race		x	
Religion or belief		x	
Sex		x	
Sexual orientation		x	

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

See above

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				N/A
To advance equality of opportunity between different groups				N/A
To foster good relations between different groups				N/A

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

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4. Community Cohesion/Social Exclusion/Poverty

	+	-	+/-	Why will it have this impact?
Community Cohesion		x		Restrictions on indoor visits and day services/respite will reduce a person’s ability to form and maintain social relationships. However the risks associated with COVID-19 community transmission rates outweighs this negative impact.
Social Exclusion		x		Restriction on indoor visits and day services/respite will reduce a person’s ability to form and maintain social relationships. However the risks associated with COVID-19 community transmission rates outweighs this negative impact.
Poverty			x	Not applicable

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

See 3a

5. Welsh

	+	-	+/-	Why will it have this effect?
What effect does the initiative have on: – people’s opportunities to use the Welsh language		x		Restrictions on social contact may reduce opportunities for someone to communicate in Welsh. However the risks associated with COVID-19 community transmission rates outweighs this negative impact.
– treating the Welsh and English languages equally		x		Restrictions on social contact may reduce opportunities for someone to communicate in Welsh. However the risks associated with COVID-19 community transmission rates outweighs this negative impact.

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

See 3a

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

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

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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	These are emergency measures in response to the COVID-19 pandemic and as such the 5 Ways of Working does not apply
ii. Prevention – preventing problems occurring or getting worse	These are emergency measures in response to the COVID-19 pandemic and as such the 5 Ways of Working does not apply
iii. Collaboration – working with other services internal or external	These are emergency measures in response to the COVID-19 pandemic and as such the 5 Ways of Working does not apply
iv. Involvement – involving people, ensuring they reflect the diversity of the population	These are emergency measures in response to the COVID-19 pandemic and as such the 5 Ways of Working does not apply

v. Integration – making connections to maximise contribution to:	These are emergency measures in response to the COVID-19 pandemic and as such the 5 Ways of Working does not apply
Council’s well-being objectives	
Other public bodies objectives	

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.

See 3a

9. Assessment Conclusions

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

	Conclusion
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Equalities	Although changes in service delivery will have a negative impact on people due to their disability and/or age, the current risks associated with the community transmission rates of COVID-19 outweigh these negative impacts.
Community Cohesion/ Social Exclusion/Poverty	Risks associated with COVID-19 community transmission rates outweighs this negative impact.
Welsh	Restrictions on social contact may reduce opportunities for someone to communicate in Welsh. However the risks associated with COVID-19 community transmission rates outweighs this negative impact.
Biodiversity	N/A
Well-being of Future Generations	These are emergency measures in response to the COVID-19 pandemic and as such the 5 Ways of Working does not apply

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 x
- **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

Risks associated with COVID-19 community transmission rates outweighs negative impacts identified in this assessment.

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?
The decision to restrict in-door care home visits will be reviewed weekly	Adult Services	Weekly	Proportionate response to COVID-19 risks
Care homes have been asked to ensure that people can receive in-door visits in situations such as end of life care. Outdoor visits are able to take place if the care home assesses this to be safe.	PO Commissioning	Ongoing	People will be able to visit in end of life situations and also be able to have outdoor visits where the care home assessed this to be safe.
risk assessment tool is being developed to identify weather restrictions on visits should be changed in light of COVID-19 community transmission rates and other factors	West Glamorgan Partnership	In progress	Development of tool

We have asked all care homes to undertake a risk assessment on enabling outdoor visits and visits in exceptional circumstances to help reduce the risk of COVID-19 transmission.	PO Commissioning	Ongoing	All care homes have risk assessments in place
There is regular correspondence between care homes and Environmental Health with regards to their infection control measures.	Environmental Health	Weekly or as required based on assessment of care home	Care homes understand and implement latest infection control requirements
Officers receive daily information on the numbers of staff or service users that have tested positive, which helps inform an understanding of risks associated with community transmission in a care setting.	PO Commissioning	Daily	Inform assessment to determine if changes to visitations should be implemented
Continue to review local community transmission rates, to help inform an understanding of risks	Adult Services		Inform assessment to determine if changes to visitations should be implemented
A regional bid for grant funding has been made to purchase iPads for care homes to enable residents to keep in touch with their friends and family.	West Glamorgan Partnership	In progress	Care homes are able to utilise technology to support residents to keep in touch with others
Ensure care homes and supported living providers implement processes to	PO Commissioning	Complete	Support providers have in place policies and processes

support residents to keep in touch with friends and family.			to support residents to keep in touch with families and friends
Identify those people residing in a Supported Living Scheme that need to continue with their usual visitation due to the overwhelming negative impact it would have on their wellbeing or health. Review this regularly in order to identify any one who's needs change.	PO for Integrated Community Services	Complete but also ongoing in line with any changes in a persons need	Proportionate response to COVID-19 risks
Where it is assessed that a person residing in a Supported Living Scheme needs to continue with their usual indoor visitation due to the overwhelming negative impact it would have on their wellbeing or health, this will be facilitated. In these situations, the support provider will be required to develop a dynamic risk assessment that takes into account how to minimise the risk of COVID-19 entering the Supported Living Scheme.	PO Commissioning	Continuing in line with anyone that is identified as having requiring a visit	Providers have dynamic risk assessments in place.
A workshop with service providers, Public Health Wales and Environmental Health has been arranged to help support providers understand how they can improve their infection control plans.	PO Commissioning	W/C 12 th October	Providers will understand latest advice on infection control, TTP and PPE and how this applies in their setting.

We have asked all supported living providers to undertake a risk assessment on enabling outdoor visits.	PO Commissioning	Complete	All providers have risk assessments in place
Best Interest Decisions will be undertaken to determine whether it is in a person's best interest to continue receiving a day service/respice, balancing assessed need for day service/respice with COVID-19 community transmission risks	PO for Integrated Community Services	Ongoing	Proportionate response to COVID-19 risks
Regularly review Best Interest Decisions in line with changes to COVID-19 community transmission rates and changes in a persons need	PO for Integrated Community Services	Ongoing	Proportionate response to COVID-19 risks
Issue a letter to people with capacity reminding them to think carefully about the risks of attending a day service.	PO Commissioning	9 th October	People can make informed decisions
Regular contact will be made with those that experience a reduction or temporary suspension of services to assess how they are managing with the situation.	PO for Integrated Community Services	Ongoing	Understand and respond to a person changes in need
The council has worked with providers to ensure that infection control measures are in place	PO for Integrated Community Services	Complete	Ensure that providers have infection control measures in place
There will be regular reviews of the COVID-19 community transmission rates in order to	Adult Services	Ongoing	Proportionate response to COVID-19 risks

assess whether the risks of continuing to provide day services outweighs the risks of closing day services. These assessments will also consider if it is possible to allow more people to attend day service/respice.			
Adult Services to issue service providers with PPE	PO Commissioning	Ongoing	Service providers have sufficient supplies of PPE to comply with PPE guidance

11. Sign off

	Name	Position	Signature	Date
Completed by	Chele Zandra Howard	PO Commissioning	C.Z.Howard	06.10.20
Signed off by	Angela Thomas	Head of Service/Director	A.Thomas	07.10.20