### **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 polices 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 Wellbeing 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 Lease of 5-6 London Road, Neath to the Office of the Police and Crime Commissioner –
	continued on next page

Initiative description and summary: Delegated authority is sought to the Head of Property and Regeneration to enter into negotiations for a new lease for the continued usage of the above property to deliver substance misuse services. Such a decision, as an internal function would not ordinarily require an IIA. However given the ongoing issues surrounding SB, linked to substance misuse in Neath Town Centre, it has been determined as being appropriate to undertake the assessment, on the basis of the provision of a substance misuse facility in respect of service users and the wider community. The decision sought is for delegated authority to the Head of Property & Regeneration to negotiate a lease but this IIA is done on the impact if the recommendation is approved (Continuation of services) or not approved (discontinuation of services).

This IIA reflects on current, and future service users, staff, and the wider community. As such it is quite detailed and complex

For clarity and to avoid repetition, it is useful to identify the main services delivered at the premises

- Dyfodol deliver Offender Interventions from the premises which is a triage, assessment, diversion, treatment and support service for 'offenders' in contact with the criminal justice system, including opiate substitution therapy.
- Dyfodol also deliver the Rapid Access Prescribing service (RAPS) for society's most vulnerable people providing them with clinical interventions and specialist holistic support including opiate substitution therapy.
- Other agencies e.g. CDAT also use the premises to see clients.
- Integrated offender management (IOM) is based at Neath, this allows local and partner agencies to co-ordinate the
  management of offenders. (Probation originally moved in circa 2012 due to having no offices at Neath Port Talbot. A few
  years later, this increased to include police and what is known as the IOM Unit. The arrangement for IOM will continue
  indefinitely.
- Other services delivered at the building include sexual health, needle exchange, blood borne virus clinics and also a wound care clinic due to start in the near future.
- Jobcentre Plus hold surgeries at the building (pre Covid)- Neath one has been stopped during the pandemic but efforts are being made to return as has already happened at Dyfodol's building in Swansea.
- These service are only available to those over the age of 18; such services are available to those under 18 but are delivered by a different provider (Health) and are unlikely to be delivered from these premises.

The value of Drug Intervention Programmes in terms of reducing harms to those who use (now or in the future), their families (including children) and to the wider community is well established/evidenced.

Recent ONS data has shown that drug poisoning deaths decreased in all local authority areas with the exception of Wrexham, Carmarthenshire, Swansea and Neath Port Talbot and Monmouthshire - The greatest proportional increase in drug poisoning deaths was Swansea Bay University Health Board (increase from 34 to 53 deaths in 2020)

The service provided have an impact for the various groups

Service Area: Partnership & Community Cohesion

**Directorate:** ELL- Partnership & Community Cohesion

#### 2. Does the initiative affect:

	Yes	No
Service users	1	
Staff		1
Wider community	1	
Internal administrative process only	1	

### 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?
General						The lease in question is in respect of a building in Neath town centre, out of which substance misuse services are delivered. If the lease is renewed there is no change and services will continue to be delivered.
						The negotiation of the lease is to enable future access to such services for those in need (e.g. rapid access proscribing of opiate substitutes) or are required to

	access substance misuse services under Offender Interventions.  Some of the impacts are cross-cutting in respect of all or some characteristics, and to avoid repetition are highlighted here.  Rationale for service  The main rationale for entering the services delivered is substance misuse, and not age. e.g. rapid access prescribing and in respect of offender interventions being required to as a result of sentencing condition/instead of a custodial sentence, i.e. Individuals who are on probation can voluntarily receive the service, or it can be a condition of their probation.  Providing treatment and support to this particular cohort is key in reducing offending and reoffending. The focus is on stabilising individuals who present as very chaotic and likely to cause harm to the community and themselves. Key elements of this are the work with the Police to provide an early intervention when someone is arrested where problematic substance use is a presenting factor and on release from prison where there are high risks of recidivism and self-poisoning which can be mitigated with ensuring continuity of clinical care when on an OST prescription and intensive casework support.
	The services work with the Probation Service and Police on site and with the Courts ensures that those individuals have closer supports and supervision in the community.
	Crime, fear of crime, reducing offending/reoffending

People travel from all over NPT to access the services, and people can congregate in the area/surrounding area, as well as access other services.  There have been reported incidents of drug dealing/taking happening near or around this building in the past; such activity is not tolerated.  There are concerns about ASB in Neath Town Centre fuelled by substance misuse/alcohol, and the negative impact this is having on inter alia the economic prosperity of the town, crime, and fear of crime.  SWP have noted that there is a small cohort of repeat offenders in terms of ASB, but whether these are people who use the services at London Road is not known. It is not known whether the service users of the facility in London Road are the protagonists of the ASB more generally either.	The aim of this service is to support people to overcome and recover from additions to illegal substances, which will have been a key factor in the reason why some of those attending have engaged in criminal activity. Without this service that level of engagement in criminal activity is likely to either increase or remain the same.  • The use of the premises does sometimes attract negative publicity, and there can be a stigma associated with this building and its clientele, particularly given the criminal justice element of the services provided.
<ul> <li>building in the past; such activity is not tolerated.</li> <li>There are concerns about ASB in Neath Town Centre fuelled by substance misuse/alcohol, and the negative impact this is having on inter alia the economic prosperity of the town, crime, and fear of crime.</li> <li>SWP have noted that there is a small cohort of repeat offenders in terms of ASB, but whether these are people who use the services at London Road is not known. It is not known whether the service users of the facility in London Road are the protagonists of the ASB more</li> </ul>	services, and people can congregate in the area/surrounding area, as well as access other services.  • There have been reported incidents of drug
repeat offenders in terms of ASB, but whether these are people who use the services at London Road is not known. It is not known whether the service users of the facility in London Road are the protagonists of the ASB more	building in the past; such activity is not tolerated.      There are concerns about ASB in Neath Town Centre fuelled by substance misuse/alcohol, and the negative impact this is having on inter alia the economic prosperity of the town, crime, and fear
	repeat offenders in terms of ASB, but whether these are people who use the services at London Road is not known. It is not known whether the service users of the facility in London Road are the protagonists of the ASB more

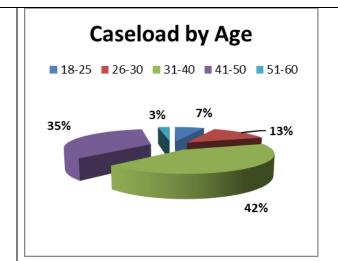
		<ul> <li>Police presence in the IOM Unit has reduced criminal activity within the area as the service were able to quickly deal with any concerns around dealing of drugs or antisocial behaviour around the building. The arrangement for IOM will continue indefinitely.</li> <li>It is evidenced that it is in everyone's interest (including interest of the whole community') to ensure that people who have committed criminal offences can access the support that they need to enable them to make changes to their lives and reduce the risk of re-offending. Supporting people to overcome their addictions, as well as the underlying causes, would be a key part of this, their recovery, etc. The harms created by substance misuse would be exacerbated if such harm reduction services were not in place in this location.</li> </ul>
		Location, and co-location with other services  The current location does allow for ease of access, being so close to the public transport. If it is easy to access, then more people are likely to remain engaged in their programme of treatment.  Also, its proximity to other support agencies, means individuals can access support to address causal and consequential issues, including psychosocial support to
		address underlying issues.  IOM is based at the premises and this has helped with people's rehabilitation by reducing the distance needed to travel appointments therefore improving compliance of

	court orders.
	However as highlighted above, its location and colocation with other services, does bring service users into the town and the issues highlighted above including fear of crime/people's perceptions.
	There is currently no alternative for a location, so it could not be immediately relocated. To not renew the lease would therefore mean that this service could not continue to be provided.
	Negative impact if change of location – more costly to access if located outside of town/different town - this could be influenced by where service users live currently, and the public transport links
	Negative impact in terms of access to and on other services if lease not renewed. If the lease were renewed the impact would be positive as services already provided would be continued.
	If the lease is not renewed and the service is closed, it would have a negative impact on those already in receipt of services and future service users and their families, particularly if no alternative provision was enabled, or one that was close to other support agencies providing e.g. psycho-social interventions (psycho social interventions provided on site for offender management).
	There are currently 75 people engaged in Dyfodol services in Neath of which 45 are currently receiving clinical treatment. The current caseload of 75 include 17 people on an Alcohol Treatment Requirement, 13 people

	on a Drug Rehabilitation Requirement and 45 people who have engaged voluntarily, accessing treatment through our arrest referral workers, probation or as prison leavers
Age	Having regard to AGE, it is noted that access to the services delivered at this property, is not based on need.
	The age of people using the service is known and all will be over 18.
	The following bullet points highlight the impacts, which are dealt with in more detail later
	The negotiation of the lease is to enable people already accessing the service to continue to do so e.g. receive treatment.
	The service delivered is positive in respect of age for the people using the service now and in the future (over 18s) – e.g. helping overcoming addiction, and other health related issues, as well as other services such as jobcentre, sexual health.
	If the lease were not renewed there would be a negative impact by age for service users (now and future) — current service users would be immediately adversely affected - lack of continuation of services for future service users
	Likewise the impact is positive for any children/families of the persons receiving support,

<ul> <li>and from a wider community perspective – accessing service reduces negative impacts on families, positive role models, less criminality + safer communities</li> <li>However consideration needs also to be given to the wider community in respect of the service continuing/not continuing.</li> <li>It could be argues that the continuation of the service has a negative impact from a community perspective in terms of crime and fear of crime, but also a positive impact in terms of the reduction in crime as a result of interventions/police presence et al (this impact would be reversed if lease not renewed), which</li> </ul>
<ul> <li>Its location close to public transport and other services, has positive and negative impacts (easier for people who need help to access services if lease continues, the reverse if lease ends); also negative in terms of people's perceptions/crime/fear of crime (which could be age related), but positive in terms of reduction in</li> </ul>
<ul> <li>related), but positive in terms of reduction in crime as a result of interventions and police presence.</li> <li>Negative impacts on the staff employed - (unemployment/redeployment associated impacts</li> <li>The value of Drug Intervention Programmes, and helping people in their recovery and of reducing harms to those you use (now or in the future),</li> </ul>

their families (including children) and to the wider community is well established/evidenced.
The following provides further detail
Children & families  The persons using the service now and in the future could have children, who would be negatively impacted if drug intervention services were not provided because of the lease not being renewed. The impact would be positive if the lease were renewed.
Age of service users  The age of the persons is over 18. If the lease is not renewed and the service is closed, it would have a negative impact on those who need/would be required to attend such services, particularly if no alternative provision was enabled or one that was close to other support agencies providing e.g. other interventions.
A snapshot of information on Neath relating to last year shows caseload by age for Dyfodol service



## Crime, fear of crime, reducing offending/reoffending

The harms created by substance misuse would be exacerbated if such harm reduction services were not in place in this location. Therefore the impact is positive if lease renewed and negative if not, for both service users and community.

Notwithstanding this, the provision of such a service in the town centre (near to other support providers) is likely to have an understandable adverse impact on people's perceptions and fear of crime. It is assumed that this would impact more on our older and younger citizens.

The over-all impact is designed to be positive in respect of those who use the service, their families and the wider community. Therefore the continuation of the lease (and therefore the services) would be positive having regard to age, and negative if the service was closed.

Disability	The access to the services delivered at the premises is determined by criteria as set out above and disability is not an accessing criteria; substance misuse is. The disability of service users would be recorded on Pal base (for offender interventions) and WICCIS for e.g. RAPS. This would be known.
	People with disability are accessing the services currently and will do so in the future.
	The over-all impact is designed to be positive in respect of those who currently access/are required to access substance misuse services, and therefore the continuation of the lease (and therefore the services) would be positive.
	However the impact would be negative in terms of disability if the lease were not be renewed There would be an immediate negative impact on people with disability if the lease were not renewed and the service closed. There would also be a negative impact in terms of future service users with disability.
	The links between substance misuse and mental health are well established/evidenced. It is recognised that drug intervention must also address mental health issues. Service users dealing with addiction often have mental health issues, services provided from this building work in partnership with the health board and other specialist mental health organisations to provide support to service users within the setting. The impact would be negative if

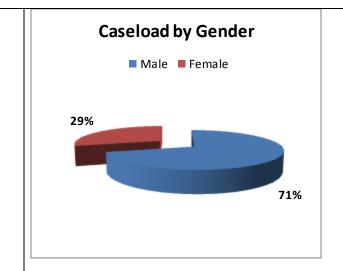
	Services delivered from the building are based on individual need and are delivered holistically taking into consideration a wide range of disabilities which include visual and hearing impairment.
	Also people with accessibility and mobility issues are currently accessing the site.
	<ul> <li>People who inject drugs are especially at great risk of life threatening harms and disabilities, removing the service (by not extending lease) would have negative and life-changing consequences, for example PWID into the groin may have severe infections resulting in whole leg amputations.</li> </ul>
	The community as a whole has concerns around ASB in the town, and it can be assumed that people with disabilities are more adversely affected by the ASB, perceptions around the use of this building by this client group, crime and fear of crime. However it is recognised that the harm to society would be greater if drug intervention programmes like this did not exist.
	There is access for disabled users- it would be described as 'limited accessibility' which is restricted to the reception area toilet and basement areas- those with physical disability cannot go to all floors of the building as there is no lift. The basement can be accessed where there is an office where psychosocial intervention can be undertaken. The building accessibility could be improved. There is a hearing Loop installed and wide

	Someone with disability could use the service in the future- however we would welcome additional consideration in the future to ensure the site is as accessible as possible – this would be done via WG grand funding application in the future once the PCC holds the lease.
Gender Reassignment	It is possible that there are and this would be known by the services. It is recognised that there may be particular additional issues for those who have undergone/are undergoing gender reassignment, although services endeavour to deliver in a tailored way to meet needs  It is anticipated that the lease and continuation of the services will have a positive impact for those that access/are required to access substance misuse services, who have undergone/are undergoing gender reassignment.  Conversely if the lease is not renewed the impact would be negative
Marriage/Civil Partnership	The access to the services delivered at the premises is determined by criteria, and not limited by marriage/civil partnership - substance misuse is the entry requirement  Some people accessing the services are likely to be married in civil partnerships, and it could be assumed that receiving support, et al would be positive to them and healthy relationships, if the lease were renewed, and negative if not.  The over-all impact is designed to be positive in respect

		of those who access/are required to access substance misuse services, and therefore the continuation of the lease (and therefore the services) would be positive regardless of marriage/civil partnership.
Pregnancy/Maternity	/	There will be women seeking substance misuse services/required to access the services that will be pregnant or have children albeit that access to the service is not limited by this factor.
		The women who are pregnant would receive specialist support and referral to other specialist support e.g. health.
		The partners of males receiving/required to receive support, could be pregnant, and therefore stabilising their substance misuse/reducing harms, would be positive for their partners and families
		The continued availability of services at these premises will be positive in respect of pregnancy and maternity, and in terms of reducing harm, if the lease is renewed.
		However the impact would be negative if the lease did not continue and services ceased.
Race		Substance misuse affects people regardless of their age, race, religion, sexual orientation, gender and marital status.
		The services delivered can cater for different cultures.

		Services delivered from the building based on individual need and are delivered holistically taking into consideration a wide range of characteristics to include religion, beliefs and culture.  Services use translation lines and take into consideration cultural norms where family members may need to be involved in consultations and appointments.  The service is delivered in line with Race Equality Act 2010 and ensures that BAME communities are encouraged and supported to access treatment.  The service is committed to developing its support opportunities to BAME and work hard to ensure that any stigma associated with accessing services is minimised.
		Therefore the impact would be positive if the lease renewed (and service continued), and negative if lease not renewed in respect of people who use the services now and in the future.  In terms of the wider community it is possible that the crime/fear of crime/perception is impacted in terms of
Religion/Belief	/	Substance misuse affects people regardless of their age, race, religion, sexual orientation, gender and marital status.
		Services delivered from the building based on individual need and are delivered holistically taking into consideration a wide range of characteristics to include

				religion, beliefs and culture.  Services use translation lines and take into consideration cultural norms where family members may need to be involved in consultations and appointments.  Therefore the impact would be positive if the lease renewed (and service continued), and negative if lease not renewed in respect of people who use the services now and in the future.
Sex	/			Substance misuse affects people regardless of their age, race, religion, sexual orientation, gender and marital status.
				The sex of the persons accessing the services will be known, and is recorded - it is relevant to note that more males than females currently access the service.
				A snapshot of people using Dyfodol services highlights that last year –



Recent figures from ONS highlight that more males than females have died as a result of drug poisonings.

Sexual health services are also delivered from the premises, so there would be an immediate negative impact if the lease were not renewed.

It is possible that persons receiving support at the services are sex workers, and victims of sexual exploitation. The absence of support services would put people at risk of entering sex work/at risk of sexual exploitation.

There would be an immediate negative impact if the lease were not renewed and the service was required to close. The impact would be positive if the lease renewed and services continued

Sexual orientation	/			Substance misuse affects people regardless of their age, race, religion, sexual orientation, gender and marital status.

## 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		1				It is part of the Offender Intervention Contract the Dyfodol Consortium are required to meet the requirements of Welsh Language Standards
Treating the Welsh language no less favourably than English		1				It is part of the Offender Intervention Contract the Dyfodol Consortium are required to meet the requirements of Welsh Language Standards

## 5. Does the initiative impact on biodiversity:

	Yes	No	None/ Negligible	_	Reasons for your decision (including evidence) / How might it impact?
To maintain and enhance biodiversity		/	1		It is not expected that the strategy will have any adverse effect on biodiversity or Eco-system resilience.

To promote the resilience of ecosystems, i.e. supporting protection of the wider environment, such as air quality, flood alleviation, etc.		/	/			It is not expected that the strategy will have any adverse effect on biodiversity or Eco-system resilience.	
--	--	---	---	--	--	---	--

# 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	/		Yes, in so far as, giving delegated authority to negotiate the continuation of the lease enables a long-standing service to be continued to be delivered from its location.
			This building was renovated using funding from Welsh Government, which has long term conditions to ensure that the building continues to be used for substance misuse or claw-back would apply.
			The funding cycle for the revenue for some of the services is annual, and this could be seen as contradictory to the view that this is a long-term project. This is a product of how WG budgets work and not reflective of the long term policy intent. There is no plans to disinvest
			The benefits to the people who use the services delivered is long-term, as are the benefits to the families and the wider community
			The continuation of the service will enable people to access services should they need to/are required to. It is in the longer term interests to have treatment services for people with substance misuse issues
			The Area Planning Board is currently working on a transformation project in partnership with the Office of the Police and Crime Commissioner to

		develop a fully integrated substance misuse service model.  Any assets that currently exist to deliver services in NPT and Swansea will form part of the consideration for the new whole service going forward.  Funding streams from all partners will be utilised to fund the new service.
Integration - how the initiative impacts upon our wellbeing objectives		This is a longstanding project, delivered out of a building owned by the Council but renovated using WG funding and occupied by Dyfodol, who deliver criminal justice misuse services. The building has now become more multi-use and is being used to deliver services that are commissioned by both the PCC and the Area Planning Board (using substance misuse action fund) that are delivered by G4s. Other services and agencies also see clients at the building including the Health Board. IOM is also at the building. Its location close to other services, means that there is strong working relationships with those services/agencies.  The service provided out of London Road supports the Council's well-being objectives - impacts primarily in relation to wellbeing objective 2 – adults but also potential indirect impacts for children.
Involvement - how people have been involved in developing the initiative	/	The original bid was put together by a range of organisations and the use of the building has continued. Partner agencies use the building.
Collaboration - how we have worked with other services/organisations to find shared sustainable solutions		This is a longstanding project, delivered out of a building owned by the Council but renovated using WG funding and occupied by Dyfodol, who deliver criminal justice misuse services. The building has now become more multi-use and is being used to deliver services that are commissioned by both the PCC and the Area Planning Board (using SMAF) that are delivered by G4s. Other services and agencies also see clients at the building. The APB is embarking on a transformation journey to take a holistic or whole life approach to the delivery of substance misuse services, dependent on a person's needs and not whether they are in the criminal justice or health treatment, etc. systems.

Prevention - how the initiative will prevent problems occurring or getting worse	/	In so far as the authority to negotiate a lease could allow the continuation of existing services which endeavour to provide support for people with substance misuse issues. Stabilisation of these issues, harm reduction techniques are part of the prevention spectrum.
		The aim of the service is to prevent harms to the people who use the service and to the wider community.
		South Wales Police are based at the building and work in partnership with Dyfodol to deliver services. The police presence at the building has meant that there has been less criminal activates taking place outside or near to the building, which is located in the Town Centre. The presence is acting as a deterrent. In the interest of the whole community to ensure that people who have committed criminal offences can access the support that they need to enable them to make changes to their lives and reduce the risk of re-offending. Supporting people to overcome their addictions, as well as the underlying causes, would be a key part of the service that is delivered from this building.

# 7. Declaration - based on above assessment (tick as appropriate):

A full impact assessment (second stage) is not required	/
Reasons for this conclusion	
The proposals contained in the report will have a positive impact on all those who are eligible/required to access the service, irrespective of their protected characteristics, if the delegated authority is granted and a lease subsequently entered into.	

A full impact assessment (second stage) is required	ı
Reasons for this conclusion	

	Name	Position	Signature	Date
Completed by	Claire Jones	Strategic Manager Partnerships & Community Cohesion	SCJones	02/09/20
Signed off by	Chris Millis	Head of Education Development	C Millis	02/09/20