

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	Chelé Zandra Howard	PO Commissioning	28/10/21

1. Details of the initiative

	Title of the Initiative: Procurement Exercise for the Provision of a Residential Short Break Services to Children and Young People with Disabilities.
1a	Service Area: Children and Young People
1b	Directorate: Social Services, Health and Housing
1c	Summary of the initiative: The procurement of a residential short break Service to Children and Young People with disabilities.
1d	Is this a 'strategic decision'? No
1e	Who will be directly affected by this initiative? <ul style="list-style-type: none">• Children and young people requiring assessed as requiring a Service• Families of children and young people assessed as requiring a Service

1f	<p>When and how were people consulted?</p> <p>The following engagement exercises were carried out in June/ July 2020 and October/ November 2021:</p> <ul style="list-style-type: none"> • Activity based engagement with children who use the service • Online and postal questionnaires to parent carers • Coffee morning with parent carers • Telephone conversations with parent carers • Meeting based discussions with Child Disability Social Work team and management • Online questionnaires with incumbent provider staff • Meeting based discussions with incumbent provider management • Online questionnaires with stakeholder organisations • Meeting based discussions with key stakeholder organisations
1g	<p>What were the outcomes of the consultation?</p> <ul style="list-style-type: none"> • Informed service model design (including core service requirements and optional extra service components) • Informed service specification (which details the service requirements) • Led to the creation of a short breaks outcomes framework which will be used to regularly evaluate service delivery based on what is important to children and their families • Provided a platform to encourage families to become more involved in co-producing services with the Council which will be further developed and embedded in the long term

2. Evidence

What evidence was used in assessing the initiative?

- Service specific data relating to the children and families using the current overnight short breaks service
- Service specific data relating to the staff who work in the current overnight short breaks service
- Client information on the Social Services database (relating to the children and their families who use the current overnight short breaks service)
- Information from the engagement and consultation activities
- Overnight short breaks service reports from the Incumbent Provider
- Information from the engagement and consultation

- Summary Statistics for South West Wales Region <https://gov.wales/sites/default/files/statistics-and-research/2020-05/summary-statistics-south-west-wales-region-2020-958.pdf>
- Daffodil data on older people <http://www.daffodilcymru.org.uk/>
- Stats Wales <https://statswales.gov.wales/Catalogue/Population-and-Migration/Population/Estimates/Local-Authority/populationestimates-by-localauthority-year> and <https://statswales.wales.gov.uk/Catalogue/Equality-and-Diversity/Sexual-Identity/SexualIdentity-by-Area-IdentityStatus>
- Western Bay Population Needs Assessment <http://www.westernbaypopulationassessment.org/en/home/#about>
- ONS data from 2011 <https://www.ons.gov.uk/census>
- Client information on the Social Services database

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>The service is for children and young people with a disability that are assessed as benefiting from a residential respite service. As such those that attend will have a protected characteristic due to their age.</p> <p>The service also supports families of children, families will be across a range of ages.</p> <p>The service is person-centred so that any individualised needs of those that stay in the respite home and family members of those that attend the home will be met. This includes being responsive to any requirements that a person has by virtue of their protected characteristic(s). In addition the re-procurement of this service is not to replace other respite options for disabled children and young people.</p> <p>The tender process will ensure that a suitably experienced provider delivers the service (i.e. experienced is delivering services to children and young people with disabilities).</p>

			<p>The provider will be contractually required to deliver a Service in accordance with relevant equalities legislation such as the Equalities Act 2010.</p> <p>All commissioned services have a complaints process and NPT CBCs contract monitoring team review complaints received by commissioned services, as well as their responses, as part of the monitoring process. The contract monitoring process also includes staff and service user feedback. This will allow the Council to pick up and address any issues relating to a person's experience. The provider will also be required to implement their own monitoring systems, which will also help to identify if any aspect of the service has led to unintended/unidentified negative impacts</p> <p>Regulation 25 of The Regulated Services (Service Providers and Responsible Individuals) (Wales) Regulations 2017 requires regulated service providers (which applies to this overnight short breaks service) to have regards to an individual's protected characteristics under the Equalities Act 2010. Compliance with these Regulations are monitored by Care Inspectorate Wales.</p> <p>The provider will be contractually required to deliver a Service in accordance with relevant equalities legislation such as the Equalities Act 2010</p> <p>All staff delivering the service will receive equality and diversity training.</p> <p>The procurement of this service will have a positive impact on both the children who use this service as well as their families as it will enable the continuation of an essential service which supports parent carers to have overnight short breaks from their caring role and helps children to develop skills that build upon their independence.</p>
Disability	x		<p>The service is for children and young people with a disability that are assessed as benefiting from a residential respite Service. As such those that attend will have a protected characteristic due to their disability.</p>

			<p>The disability status of families is unknown however respite supports carers to achieve their own wellbeing outcomes by offering them a break from their caring responsibilities.</p> <p>The Service is person-centred so that any individualised needs of those that stay in the respite home and family members of those that attend the home will be met. This includes being responsive to any requirements that a person has by virtue of their protected characteristic(s). In addition the re-procurement of this service is not to replace other respite options for disabled children and young people.</p> <p>The tender process will ensure that a suitably experienced provider delivers the service (i.e. experienced is delivering services to children and young people with disabilities)</p> <p>All commissioned services have a complaints process and NPT CBCs contract monitoring team review complaints received by commissioned services, as well as their responses, as part of the monitoring process. The contract monitoring process also includes staff and service user feedback. This will allow the Council to pick up and address any issues relating to a person's experience. The provider will also be required to implement their own monitoring systems, which will also help to identify if any aspect of the service has led to unintended/unidentified negative impacts</p> <p>Regulation 25 of The Regulated Services (Service Providers and Responsible Individuals) (Wales) Regulations 2017 requires regulated service providers (which applies to this overnight short breaks service) to have regards to an individual's protected characteristics under the Equalities Act 2010. Compliance with these Regulations are monitored by Care Inspectorate Wales.</p> <p>The provider will be contractually required to deliver a service in accordance with relevant equalities legislation such as the Equalities Act 2010</p> <p>All staff delivering the service will receive equality and diversity training.</p>
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Gender reassignment		x	<p>There is no available data however eligibility for the service will not change as a result of this tender.</p> <p>The service is person-centred so that any individualised needs of those that stay in the respite home and family members of those that attend the home will be met. This includes being responsive to any requirements that a person has by virtue of their protected characteristic(s). In addition the re-procurement of this service is not to replace other respite options for disabled children and young people.</p> <p>All commissioned services have a complaints process and NPT CBCs contract monitoring team review complaints received by commissioned services, as well as their responses, as part of the monitoring process. The contract monitoring process also includes staff and service user feedback. This will allow the Council to pick up and address any issues relating to a person's experience. The provider will also be required to implement their own monitoring systems, which will also help to identify if any aspect of the service has led to unintended/unidentified negative impacts</p> <p>Regulation 25 of The Regulated Services (Service Providers and Responsible Individuals) (Wales) Regulations 2017 requires regulated service providers (which applies to this overnight short breaks service) to have regards to an individual's protected characteristics under the Equalities Act 2010. Compliance with these Regulations are monitored by Care Inspectorate Wales.</p> <p>The provider will be contractually required to deliver a service in accordance with relevant equalities legislation such as the Equalities Act 2010</p>

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Marriage & civil partnership	x		<p>The age range for eligibility to attend means that marriage and civil partnership would not apply to those staying at the Care Home.</p> <p>Family members of the children and young people may be married/in a civil partnership. Respite supports carers to achieve their own wellbeing outcomes by offering them a break from their caring responsibilities.</p> <p>The service is person-centred so that any individualised needs of those that stay in the respite home and family members of those that attend the home will be met. This includes being responsive to any requirements that a person has by virtue of their protected characteristic. In addition the re-procurement of this service is not to replace other respite options for disabled children and young people.</p> <p>All commissioned services have a complaints process and NPT CBCs contract monitoring team review complaints received by commissioned services, as well as their responses, as part of the monitoring process. The contract monitoring process also includes staff and service user feedback. This will allow the Council to pick up and address any issues relating to a person's experience. The provider will also be required to implement their own monitoring systems, which will also help to identify if any aspect of the service has led to unintended/unidentified negative impacts</p> <p>Regulation 25 of The Regulated Services (Service Providers and Responsible Individuals) (Wales) Regulations 2017 requires regulated service providers (which</p>

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Pregnancy and maternity		x	<p>Data on this characteristic is unknown however eligibility for the service will not change as a result of this tender.</p> <p>The service is person-centred so that any individualised needs of those that stay in the respite home and family members of those that attend the home will be met. This includes being responsive to any requirements that a person has by virtue of their protected characteristic(s). In addition the re-procurement of this service is not to replace other respite options for disabled children and young people.</p> <p>All commissioned services have a complaints process and NPT CBCs contract monitoring team review complaints received by commissioned services, as well as their responses, as part of the monitoring process. The contract monitoring process also includes staff and service user feedback. This will allow the Council to pick up and address any issues relating to a person's experience. The provider will also be required to implement their own monitoring systems, which will also help to identify if any aspect of the service has led to unintended/unidentified negative impacts</p>

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Race		x	<p>Data on this characteristic is unknown however eligibility for the service will not change as a result of this tender.</p> <p>The service is person-centred so that any individualised needs of those that stay in the respite home and family members of those that attend the home will be met. This includes being responsive to any requirements that a person has by virtue of their protected characteristic(s). In addition the re-procurement of this service is not to replace other respite options for disabled children and young people.</p> <p>All commissioned services have a complaints process and NPT CBCs contract monitoring team review complaints received by commissioned services, as well as their responses, as part of the monitoring process. The contract monitoring process also includes staff and service user feedback. This will allow the Council to pick up and address any issues relating to a person's experience. The provider will also be</p>

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Religion or belief		x	<p>Data on this characteristic is unknown however eligibility for the service will not change as a result of this tender.</p> <p>The service is person-centred so that any individualised needs of those that stay in the respite home and family members of those that attend the home will be met. This includes being responsive to any requirements that a person has by virtue of their protected characteristic(s). In addition the re-procurement of this service is not to replace other respite options for disabled children and young people.</p> <p>All commissioned services have a complaints process and NPT CBCs contract monitoring team review complaints received by commissioned services, as well as</p>

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Sex		x	<p>Data does not indicate that this proposal will impact on people due to their sex.</p> <p>The service is person-centred so that any individualised needs of those that stay in the respite home and family members of those that attend the home will be met. This includes being responsive to any requirements that a person has by virtue of their protected characteristic(s). In addition the re-procurement of this service is not to replace other respite options for disabled children and young people.</p>

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Sexual orientation		x	<p>Data on this characteristic is unknown however eligibility for the service will not change as a result of this tender.</p> <p>The service is person-centred so that any individualised needs of those that stay in the respite home and family members of those that attend the home will be met. This includes being responsive to any requirements that a person has by virtue of their</p>

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

- The Service Provider will produce monthly performance reports which will include details of complaints/ issues which will be analysed by the Commissioning team.
- A monthly panel (consisting of a Commissioning Officer, Child Disability Team Manager and the Service Provider Manager) will meet to discuss referrals, service performance, outcome progression, complaints and service related issues.
- Commissioning team to monitor the service through the annual contract monitoring process to ensure compliance with relevant legislation and guidance.
- Commissioning team to monitor safeguarding referrals and complaints regarding the service.

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			<p>The aim of the service is to offer disabled Children and Young People with fun, enjoyable experiences away from home, which will support them to learn and develop new skills to help them fulfil their potential. In addition, the service also provides parent carers with regular opportunities to take breaks from their caring responsibilities.</p> <p>The procurement of this service will have a positive impact on both the children who use this service as well as their families as it will enable the continuation of an essential service which supports parent carers to have overnight short breaks from their caring role and helps children to develop skills that build upon their independence.</p>
To advance equality of opportunity between different groups	x			

To foster good relations between different groups	x			
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- A monthly panel (consisting of a Commissioning Officer, Child Disability Team Manager and the Service Provider Manager) will meet to discuss referrals, service performance, outcome progression, complaints and service related issues.
- Commissioning team to monitor the service through the annual contract monitoring process.
- Commissioning team to monitor safeguarding referrals and complaints regarding the service.

4. Socio Economic Duty

Impact	Details of the impact/advantage/disadvantage
Positive/Advantage	<p>The aim of the service is to offer disabled children and young people with fun, enjoyable experiences away from home, which will support them to learn and develop new skills to help them fulfil their potential. In addition, the service also provides parent carers with regular opportunities to take breaks from their caring responsibilities.</p> <p>There is no charge for attending the service, as such this service is equitably available regardless of a person's socio-economic status.</p> <p>The procurement of this service will have a positive impact on both the children who use this service as well as their families as it will enable the continuation of an essential service which supports parent carers to have overnight short breaks from their caring role and helps children to develop skills that build upon their independence.</p>
Negative/Disadvantage	None identified

Neutral	None identified
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What action will be taken to reduce inequality of outcome
<ul style="list-style-type: none"> • The Service Provider will produce monthly performance reports which will include details of complaints/ issues which will be analysed by the Commissioning team. • A monthly panel (consisting of a Commissioning Officer, Child Disability Team Manager and the Service Provider Manager) will meet to discuss referrals, service performance, outcome progression, complaints and service related issues. • Commissioning team to monitor the service through the annual contract monitoring process. • Commissioning team to monitor safeguarding referrals and complaints regarding the service.

5. Community Cohesion/Social Exclusion/Poverty

	+	-	+/-	Why will it have this impact?
Community Cohesion	x			<p>The procurement of this service will have a positive impact on both the children who use this service as well as their families as it will enable the continuation of an essential service which supports parent carers to have overnight short breaks from their caring role and helps children to develop skills that build upon their independence.</p> <p>The aim of the service is to offer disabled children and young people with fun, enjoyable experiences away from home, which will support them to learn and develop new skills to help them fulfil their potential, as well as developing friendship groups. In addition, the service also provides parent carers with regular opportunities to take breaks from their caring responsibilities, which will help them to remain active members of their community and maintain relationships.</p>

				There is no charge for attending the service so attending will have no impact on a person income. In addition, regular respite can help support parent carers to gain or retain employment.
Social Exclusion	x			
Poverty	x			

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

- The Service Provider will produce monthly performance reports which will include details of complaints/ issues which will be analysed by the Commissioning team.
- A monthly panel (consisting of a Commissioning Officer, Child Disability Team Manager and the Service Provider Manager) will meet to discuss referrals, service performance, outcome progression, complaints and service related issues.
- Commissioning team to monitor the service through the annual contract monitoring process.
- Commissioning team to monitor safeguarding referrals and complaints regarding the service.

6. Welsh

	+	-	+/-	Why will it have this effect?
What effect does the initiative have on: – people's opportunities to use the Welsh language			x	The re-procurement will ensure that people will be able to continue accessing the Service in their language of choice
– treating the Welsh and English languages equally			x	The re-procurement will ensure that people will be able to continue accessing the Service in their language of choice

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

- The Service Provider will produce monthly performance reports which will include details of complaints/ issues which will be analysed by the Commissioning team.
- A monthly panel (consisting of a Commissioning Officer, Child Disability Team Manager and the Service Provider Manager) will meet to discuss referrals, service performance, outcome progression, complaints and service related issues.
- Commissioning team to monitor the service through the annual contract monitoring process.
- Commissioning team to monitor safeguarding referrals and complaints regarding the service.

7. 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	Not Applicable
To promote the resilience of ecosystems, i.e. supporting protection of the wider environment, such as air quality, flood alleviation, etc.			x	Not Applicable

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

Not applicable

8. 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	<p>The aim of the service is to offer disabled children and young people with fun, enjoyable experiences away from home, which will support them to learn and develop new skills to help them fulfil their potential. In addition, the service also provides parent carers with regular opportunities to take breaks from their caring responsibilities. As such this will have a positive impact on people’s long term wellbeing.</p>
ii. Prevention – preventing problems occurring or getting worse	<p>The aim of the service is to offer disabled children and young people with fun, enjoyable experiences away from home, which will support them to learn and develop new skills to help them fulfil their potential. In addition, the service also provides parent carers with regular opportunities to take breaks from their caring responsibilities.</p> <p>As such a procurement process to ensure the continuation of the service will support families to have regular short breaks from their caring role which aims to support them to continue in their parent carer role in the long term.</p> <p>The continuation of the service will also help children and young people develop skills that build upon their independence and preventing the need to access more services in the long term.</p>

iii. Collaboration – working with other services internal or external	This will involve working with a specialist organisation to deliver services that support the Council in meeting the needs of children and young people with disabilities, as well as their families.
iv. Involvement – involving people, ensuring they reflect the diversity of the population	Those that use services and their families have been involved in the service review and will be involved in the evaluation process.
v. Integration – making connections to maximise contribution to:	This services supports integration by affording children and young people with opportunities to learn and develop new skills and friendship groups away from their home. It also enables parent carers to have a break from their caring role, which supports integration with their wider communities.
Council’s well-being objectives	Undertaking a procurement process to ensure the continuation of the service will improve the well-being of adults, children and young people who live in the county borough by ensuring the continuation of a service which will support families to access overnight short breaks from their caring role and to help children and young people develop skills that build upon their independence.
Other public bodies objectives	

9. 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.

- The Service Provider will produce monthly performance reports which will include details of complaints/ issues which will be analysed by the Commissioning team.
- A monthly panel (consisting of a Commissioning Officer, Child Disability Team Manager and the Service Provider Manager) will meet to discuss referrals, service performance, outcome progression, complaints and service related issues.
- Commissioning team to monitor the service through the annual contract monitoring process.
- Commissioning team to monitor safeguarding referrals and complaints regarding the service.

10. Assessment Conclusions

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

	Conclusion
Equalities	<p><u>Service Users</u> – will have a positive impact on those with a protected characteristic of age and disability as it ensures the continuation of services that will help children and young people develop skills that build upon their independence. The re-procurement of this service will not make changes to the eligibility criteria.</p> <p><u>Families of Service Users</u> – will have a positive impact on those with a protected characteristic of age and marriage/civil partnership as it ensures the continuation of a service that supports families to access overnight short breaks from their caring role.</p> <p><u>Both Groups</u> – will have a neutral impact on people with other protected characteristics as eligibility for the service is based on an assessment of need of children and young people with a disability. Access to the Service is not based on other protected characteristics and this re-procurement does not make changes to the eligibility criteria.</p> <p>The service is person-centred so that any individualised needs of those that use the service and their parent carers will be met. This includes being responsive to any requirements that a person has by virtue of their protected characteristic(s). In addition the re-procurement of this service is not to replace other short break service options available for disabled children and young people.</p> <p>Regulation 25 of The Regulated Services (Service Providers and Responsible Individuals) (Wales) Regulations 2017 requires regulated service providers (which applies to this overnight short breaks service) to have regards to an individual’s protected characteristics under the Equalities Act 2010. Compliance with these Regulations are monitored by Care Inspectorate Wales.</p> <p>The provider will be contractually required to deliver a service in accordance with relevant equalities legislation such as the Equalities Act 2010</p>

	<p>All commissioned services have a complaints process and NPT CBCs contract monitoring team review complaints received by commissioned services, as well as their responses, as part of the monitoring process. The contract monitoring process also includes staff and service user feedback. This will allow the Council to pick up and address any issues relating to a person's experience.</p>
<p>Socio Economic Disadvantage</p>	<p><u>Both Groups</u> - Will have a positive impact as the aim of the service is to offer disabled children and young people with fun, enjoyable experiences away from home, which will support them to learn and develop new skills to help them fulfil their potential. In addition, the service also provides parent carers with regular opportunities to take breaks from their caring responsibilities.</p> <p>There is no charge for attending the Service, as such this Service is equitably available regardless of a person's socio-economic status.</p> <p>The procurement of this service will have a positive impact on both groups of people as it will enable the continuation of essential services once the current contract ends that supports families to have respite from their caring role and helps children and young people to develop skills that build upon their independence.</p>
<p>Community Cohesion/ Social Exclusion/Poverty</p>	<p><u>Both Groups</u> – Will have a positive impact as the aim of the service is to offer disabled children and young people with fun, enjoyable experiences away from home, which will support them to learn and develop new skills to help them fulfil their potential. In addition, the service also provides parent carers with regular opportunities to take breaks from their caring responsibilities.</p> <p>There is no charge for attending the Service so attending will have no impact on a person income.</p> <p>The procurement of this service will have a positive impact on both groups of people as it will enable the continuation of essential services once the current contract ends that supports families to have respite from their caring role and helps children and young people to develop skills that build upon their independence.</p>

Welsh	<u>Both Groups</u> – will have a neutral impact as the re-procurement will ensure that people will be able to continue accessing the service in their language of choice
Biodiversity	Not applicable to this proposal
Well-being of Future Generations	<u>Both Groups</u> - will have a positive impact on meeting the five ways of working under the Well-being of Future Generation Act as the undertaking of a procurement process will ensure the contention of services that improve the well-being of adults, children and young people who live in the county borough.

Overall Conclusion

Please indicate the conclusion reached:

- **Continue** - as planned as no problems and all opportunities have been maximised x
- **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 procurement of this service will have a positive impact as it will enable the continuation of essential services once the current contract ends that supports families to have respite from their caring role and helps children and young people to develop skills that build upon their independence.

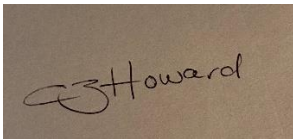
11. Actions

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?
Commissioning team to monitor the service through the yearly contract monitoring process	PO Commissioning	Within first 3 months of new contract and then annually, or as required.	Annual contract monitoring reports
Commissioning team to monitor safeguarding referrals and complaints regarding the service	PO Commissioning	As referrals are made to safeguarding	Additional monitoring visits to identify if changes have been implemented and sustained
Provider to produce monthly performance reports which will include details of complaints/ issues	The Provider	Monthly	Monthly reports
Monthly panel (consisting of a Commissioning Officer, Child Disability Team Manager and the Service Provider Manager) to discuss referrals, service performance, outcome progression, complaints and service related issues.	Child Disability Team Manager	Monthly	Monthly meetings
Children and Young People and their families that will receive a service to inform service specification	PO Commissioning	In line with procurement timeline	Contract will be shaped by feedback from those using the service
Children and Young People and their families that will receive a service to be invited	PO Commissioning	In line with procurement timeline	People will have had the opportunity to take part in the evaluation

to play a part in the tender evaluation			
The contract will have clauses relating to ensuring compliance with the relevant equalities legislation.	PO Commissioning	In line with procurement timeline	Contract includes required clauses
Procurement process to include questions regarding equalities legislation	PO Commissioning	In line with procurement timeline	Procurement questions to include relevant questions
The contract will obligate the provider to deliver the service in the residents chosen first language	PO Commissioning	In line with procurement timeline	Contract includes required clauses

12. Sign off

	Name	Position	Signature	Date
Completed by	Chelé Zandra Howard	PO Commissioning		29.10.21
Signed off by	Kerri Warren	Head of Service	K.Warren	29.10.21