

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 |
|----------------|---------------------|------------------|----------|
| e.g. Version 1 | Chelé Zandra Howard | PO Commissioning | 27.07.22 |
| | | | |

1. Details of the initiative

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|-----------|--|
| | Title of the Initiative: Procuring A Managed Account and Payroll Direct Payment Support Framework |
| 1a | Service Area: Adult Services |
| 1b | Directorate: Social Services, Health and Housing |
| 1c | <p>Summary of the initiative:</p> <p>This report sets out a proposal to undertake an exercise in order to identify a range of providers who are approved by the Council to offer Managed Accounts and Payroll Support services to people in receipt of Direct Payments. These providers may be used when Direct Payment recipients elect to have support in these areas through their Direct Payment arrangements.</p> <p>There is an existing arrangement in place which is similar to this proposed new arrangement, however there's a need to strengthen the current arrangements and update the associated documentation.</p> |
| 1d | Is this a 'strategic decision'? yes |
| 1e | <p>Who will be directly affected by this initiative?</p> <p>People that require support in managing their Direct Payment in relation to payroll and/or financial management.</p> |

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| 1f | When and how were people consulted? People who require these services will be engaged with as part of the exercise to take forward the proposal. |
| 1g | What were the outcomes of the consultation? People who require these services will be able to inform the exercise to take forward the proposal |

2. Evidence

What evidence was used in assessing the initiative?

- Care assessment and plans
- Housing assessments and plans
- Social Services routinely collects data as part of the assessment/review process of individuals which is reported to Welsh Government.
- Western Bay Population Needs Assessment <http://www.westernbaypopulationassessment.org/en/learning/>
- 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 <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>
- ONS data from 2011 <https://www.ons.gov.uk/census>
- NPT CBC Adults Plan <https://www.npt.gov.uk/media/14700/plan-for-adult-social-care-2019-2022.pdf?v=20210914151908>
- Western Bay Area Planning Board Commissioning Plan 2014-2019 <https://democracy.swansea.gov.uk/documents/s17766/12%20b%203%20of%205%20-%20Appendix%202%20-%20Development%20of%20the%20Regional%20Western%20Bay%20Arrangements%20for%20the%20Substance%20.pdf>

The below information is in relation to all people that receive a direct payment, of which some will require a managed account and/or payroll service.

| Category | Count |
|----------|-------|
| Elderly | 91 |

| | |
|---------------------|-----|
| Children | 67 |
| PDSI | 127 |
| Learning Disability | 158 |
| Mental Health | 19 |

| Gender | Count |
|--------|-------|
| Male | 211 |
| Female | 251 |

| Age | Count |
|-------|-------|
| 0-15 | 47 |
| 16-25 | 75 |
| 26-35 | 70 |
| 36-45 | 43 |
| 46-55 | 52 |
| 56-65 | 60 |
| 66-75 | 50 |
| 76-85 | 34 |
| 86-95 | 25 |
| 96 > | 6 |

| Cluster | Count |
|--------------|-------|
| Afan | 187 |
| Upper Valley | 107 |
| Neath | 155 |
| Other | 13 |

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>People in receipt of a direct payment are can be any age and there is not one particular age group more likely to receive a direct payment. Therefore, the managed account and payroll support services will be delivered to people across the spectrum of ages.</p> <p>Managed accounts and payroll support services have a positive impact on people that may be eligible for a direct payment, as it enables people that may not be able to manage these elements of a direct payment to have equal opportunity to receive a direct payment.</p> <p>There are no changes to the nature or scope of services to be provided, the proposal is to enter into a more formal relationship with providers of these services and to increase the number of providers offering these services to those that require them. Increasing the number of providers that a person in receipt of a direct payment can choose from will be a positive impact as people will have more choice.</p> <p>The proposal will not make any changes to the current provision for people already receiving these services. Furthermore, this proposal will not make any changes to the eligibility criteria for people requiring these services.</p> <p>The process will ensure that suitably experienced providers deliver the services. In addition, the process to establish a list of providers will include questions regarding equalities legislation.</p> <p>The Common Commissioning Unit will analyse any complaints and safeguarding referrals regarding the services to identify if there are any concerns regarding the services having a negative impact on people with a protected characteristic.</p> |

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| | | | <p>The providers 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> |
| Disability | x | | <p>All people that are eligible for a direct payment will be assessed as having a disability and therefore the managed account and payroll support services will be delivered to people that have a disability.</p> <p>Managed accounts and payroll support services have a positive impact on people that may be eligible for a direct payment, as it enables people that may not be able to manage these elements of a direct payment to have equal opportunity to receive a direct payment.</p> <p>There are no changes to the nature or scope of services to be provided, the proposal is to enter into a more formal relationship with providers of these services and to increase the number of providers offering these services to those that require them. Increasing the number of providers that a person in receipt of a direct payment can choose from will be a positive impact as people will have more choice.</p> <p>The proposal will not make any changes to the current provision for people already receiving these services. Furthermore, this proposal will not make any changes to the eligibility criteria for people requiring these services.</p> <p>The process will ensure that suitably experienced providers deliver the services. In addition the process to establish a list of providers will include questions regarding equalities legislation.</p> <p>The Common Commissioning Unit will analyse any complaints and safeguarding referrals regarding the services to identify if there are any concerns regarding the services having a negative impact on people with a protected characteristic.</p> |

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| | | | <p>The providers 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> |
| Gender reassignment | x | | <p>No information is captured in relation to the number of people accessing the services that may have had gender reassignment.</p> <p>The gender identity of a person is not a barrier to accessing the service and the service is open to all people with an eligible need. The proposal does not make any changes to the current provision or eligibility criteria for the service.</p> <p>Managed accounts and payroll support services have a positive impact on people that may be eligible for a direct payment, as it enables people that may not be able to manage these elements of a direct payment to have equal opportunity to receive a direct payment. As such this proposal has an indirect positive impact on people with this protected characteristic that will require these services.</p> <p>There are no changes to the nature or scope of services to be provided, the proposal is to enter into a more formal relationship with providers of these services and to increase the number of providers offering these services to those that require them. Increasing the number of providers that a person in receipt of a direct payment can choose from will be a positive impact as people will have more choice.</p> <p>The proposal will not make any changes to the current provision for people already receiving these services. Furthermore, this proposal will not make any changes to the eligibility criteria for people requiring these services.</p> <p>The process will ensure that suitably experienced providers deliver the services. In addition the process to establish a list of providers will include questions regarding equalities legislation.</p> |

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| | | | <p>The Common Commissioning Unit will analyse any complaints and safeguarding referrals regarding the services to identify if there are any concerns regarding the services having a negative impact on people with a protected characteristic.</p> <p>The providers 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> |
| Marriage & civil partnership | | x | <p>No information is captured in relation to the number of people accessing the services that may be married or in a civil partnership.</p> <p>The marriage/civil partnership status of a person is not a barrier to accessing the service and the service is open to all people with an eligible need. The proposal does not make any changes to the current provision or eligibility criteria for the service.</p> <p>Managed accounts and payroll support services have a positive impact on people that may be eligible for a direct payment, as it enables people that may not be able to manage these elements of a direct payment to have equal opportunity to receive a direct payment. As such this proposal has an indirect positive impact on people with this protected characteristic that will require these services.</p> <p>There are no changes to the nature or scope of services to be provided, the proposal is to enter into a more formal relationship with providers of these services and to increase the number of providers offering these services to those that require them. Increasing the number of providers that a person in receipt of a direct payment can choose from will be a positive impact as people will have more choice.</p> <p>The proposal will not make any changes to the current provision for people already receiving these services. Furthermore, this proposal will not make any changes to the eligibility criteria for people requiring these services.</p> |

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| Pregnancy and maternity | | x | <p>No information is captured in relation to the number of people accessing this services that may be pregnant or have a protected characteristic by way of their maternity status.</p> <p>The pregnancy/maternity status of a person is not a barrier to accessing the service and the service is open to all people with an eligible need. The proposal does not make any changes to the current provision or eligibility criteria for the service.</p> <p>Managed accounts and payroll support services have a positive impact on people that may be eligible for a direct payment, as it enables people that may not be able to manage these elements of a direct payment to have equal opportunity to receive a direct payment. As such this proposal has an indirect positive impact on people with this protected characteristic that will require these services.</p> <p>There are no changes to the nature or scope of services to be provided, the proposal is to enter into a more formal relationship with providers of these services and to increase the number of providers offering these services to those that require them. Increasing the number of providers that a person in receipt of a direct payment can choose from will be a positive impact as people will have more choice.</p> |

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| | | | <p>The process will ensure that suitably experienced providers deliver the services. In addition the process to establish a list of providers will include questions regarding equalities legislation.</p> <p>The Common Commissioning Unit will analyse any complaints and safeguarding referrals regarding the services to identify if there are any concerns regarding the services having a negative impact on people with a protected characteristic.</p> <p>The services will be monitored by the Common Commissioning Unit (which includes receiving resident's feedback) and the Unit will also analyse any complaints and safeguarding referrals regarding the services to identify if there are any concerns regarding the services having a negative impact on people with a protected characteristic.</p> <p>The providers 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> |
| Race | | x | <p>No information is captured in relation to the race of people accessing the services.</p> <p>The race of a person is not a barrier to accessing the service and the service is open to all people with an eligible need. The proposal does not make any changes to the current provision or eligibility criteria for the service.</p> <p>Managed accounts and payroll support services have a positive impact on people that may be eligible for a direct payment, as it enables people that may not be able to manage these elements of a direct payment to have equal opportunity to receive a direct payment. As such this proposal has an indirect positive impact on people with this protected characteristic that will require these services.</p> <p>There are no changes to the nature or scope of services to be provided, the proposal is to enter into a more formal relationship with providers of these services</p> |

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| | | | <p>and to increase the number of providers offering these services to those that require them. Increasing the number of providers that a person in receipt of a direct payment to choose from will be a positive impact as people will have more choice.</p> <p>The proposal will not make any changes to the current provision for people already receiving these services. Furthermore, this proposal will not make any changes to the eligibility criteria for people requiring these services.</p> <p>The process will ensure that suitably experienced providers deliver the services. In addition the process to establish a list of providers will include questions regarding equalities legislation.</p> <p>The Common Commissioning Unit will analyse any complaints and safeguarding referrals regarding the services to identify if there are any concerns regarding the services having a negative impact on people with a protected characteristic.</p> <p>The providers 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> |
| Religion or belief | | x | <p>No information is captured in relation to the religion or belief of people accessing the services.</p> <p>The religion/belief of a person is not a barrier to accessing the service and the service is open to all people with an eligible need. The proposal does not make any changes to the current provision or eligibility criteria for the service.</p> <p>Managed accounts and payroll support services have a positive impact on people that may be eligible for a direct payment, as it enables people that may not be able to manage these elements of a direct payment to have equal opportunity to receive a direct payment. As such this proposal has an indirect positive impact on people with this protected characteristic that will require these services.</p> |

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| Sex | x | | <p>The gender split of people in receipt of a direct payment is about equal and there is not one particular gender more likely to receive a direct payment. Therefore, the managed account and payroll support services will be delivered to people across the spectrum of genders.</p> <p>Managed accounts and payroll support services have a positive impact on people that may be eligible for a direct payment, as it enables people that may not be able to manage these elements of a direct payment to have equal opportunity to receive a direct payment.</p> |

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| Sexual orientation | | x | <p>No information is captured in relation to the sexual orientation of people accessing the services.</p> <p>The sexual orientation of a person is not a barrier to accessing the service and the service is open to all people with an eligible need. The proposal does not make any changes to the current provision or eligibility criteria for the service.</p> <p>Managed accounts and payroll support services have a positive impact on people that may be eligible for a direct payment, as it enables people that may not be able</p> |

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| | | | <p>to manage these elements of a direct payment to have equal opportunity to receive a direct payment. As such this proposal has an indirect positive impact on people with this protected characteristic that will require these services.</p> <p>There are no changes to the nature or scope of services to be provided, the proposal is to enter into a more formal relationship with providers of these services and to increase the number of providers offering these services to those that require them. Increasing the number of providers that a person in receipt of a direct payment to choose from will be a positive impact as people will have more choice.</p> <p>The proposal will not make any changes to the current provision for people already receiving these services. Furthermore, this proposal will not make any changes to the eligibility criteria for people requiring these services.</p> <p>The process will ensure that suitably experienced providers deliver the services. In addition the process to establish a list of providers will include questions regarding equalities legislation.</p> <p>The Common Commissioning Unit will analyse any complaints and safeguarding referrals regarding the services to identify if there are any concerns regarding the services having a negative impact on people with a protected characteristic.</p> <p>The providers 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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What action will be taken to improve positive or mitigate negative impacts?

- Analysis of any complaints and safeguarding referrals relating to the service by the CCU
- Analysis of Provider monitoring data by the CCU
- Process to include questions regarding equalities legislation.

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 | | | Prevents discrimination of people that may not be able to oversee all functions of a direct payment by giving them equal opportunity to access direct payments. |
| To advance equality of opportunity between different groups | x | | | Advances equality of opportunity between those that can manage all aspects of a direct payment and those that cannot by giving them equal opportunity to access direct payments. |
| To foster good relations between different groups | x | | | Direct payments enables people with disabilities to have maximum choice and control over the support required to meet their outcomes. Enabling people to access direct payments in order to achieve their outcomes helps to foster good relationships between those with a disability and those that do not have a disability as direct payments enable people to live full lives within their local communities. |

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

- Analysis of any complaints and safeguarding referrals relating to the service by the CCU
- Analysis of Provider monitoring data by the CCU

4. Socio Economic Duty

| Impact | Details of the impact/advantage/disadvantage |
|-----------------------|--|
| Positive/Advantage | <p>Will have a positive impact as the services will enable more people to access direct payments in order to meet their assessed needs and outcomes. Services purchased through direct payments help improve a person’s wellbeing by meeting their assessed social care needs.</p> <p>Direct payments will help to maintain or improve a person’s independence, which in turn will help to improve socio-economic disadvantages that people with a lifelong disability may experience in terms of their personal and social outcomes</p> |
| Negative/Disadvantage | |
| Neutral | <p>There will be no change to the Council’s fairer charging policy in relation to people receiving the service. The fairer charging thresholds are set by Welsh Government.</p> |

What action will be taken to reduce inequality of outcome

- Analysis of any complaints and safeguarding referrals relating to the service by the CCU
- Analysis of Provider monitoring data by the CCU

5. Community Cohesion/Social Exclusion/Poverty

| | + | - | +/- | Why will it have this impact? |
|--------------------|---|---|-----|--|
| Community Cohesion | x | | | Direct payments enables people with disabilities to have maximum choice and control over the support required to meet their outcomes. Providing people with the means to access a direct payment enables people with care and support needs to achieve their independence and preferred outcomes so that they can live in their local communities, thereby enabling cohesive communities that are inclusive of people with disabilities. |
| Social Exclusion | x | | | Direct payments enables people with disabilities to have maximum choice and control over the support required to meet their outcomes. Providing people with the means to access a direct payment enables people with care and support needs to achieve their independence and preferred outcomes, so that people are not socially excluded due to their disability. |
| Poverty | | | x | There will be no change to the Councils fairer charging policy in relation to people receiving the service. The fairer charging thresholds are set by Welsh Government. |

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

- Analysis of any complaints and safeguarding referrals relating to the service by the CCU
- Analysis of Provider monitoring data by the CCU

6. Welsh

| | + | - | +/- | Why will it have this effect? |
|--|---|---|-----|--|
| What effect does the initiative have on: – people’s opportunities to use the Welsh language | x | | | Providers will be required to deliver the service in the residents chosen first language |
| – treating the Welsh and English languages equally | x | | | Providers will be required to deliver the service in the residents chosen first language |

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

- Analysis of any complaints and safeguarding referrals relating to the service by the CCU
- Analysis of Provider monitoring data by the CCU

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 this proposal |

| | | | | |
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| To promote the resilience of ecosystems, i.e. supporting protection of the wider environment, such as air quality, flood alleviation, etc. | | | x | Not applicable to this proposal |
|--|--|--|---|---------------------------------|

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

Not applicable to this proposal

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 | Enabling people to access a direct payment supports people in being able to achieve their long term social care and wellbeing needs. |
| ii. Prevention – preventing problems occurring or getting worse | Enabling people to access a direct payment enables people to stay independent within their communities and prevents the need for people to require more institutionalised care models. |
| iii. Collaboration – working with other services internal or external | This proposal involves a collaboration between social services, the person assessed as having a care and support need, the person or organisation delivering care and the organisations supporting the management of the direct payment. |
| iv. Involvement – involving people, ensuring they | Enabling people to access a direct payment provides maximum choice and control over how a person with assessed social care needs achieves their individual outcomes and care needs. |

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| reflect the diversity of the population | Having a list of approved providers to offer people support in managing elements of their direct payment allows more choice to those that need this support. |
| v. Integration – making connections to maximise contribution to: | |
| Council’s well-being objectives | To improve the well-being of all adults who live in the county borough by giving people maximum choice and control over the services they require to meet their assessed needs and outcomes. |
| 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 Common Commissioning Unit will analyse any complaints and safeguarding referrals regarding the scheme to identify if there are any concerns regarding the service having a negative impact on people with a protected characteristic. 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.

10. Assessment Conclusions

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

| | Conclusion |
|-------------------|--|
| Equalities | The indication is that the proposal will have a positive impact; however, systems will be in place that will allow officers to check that the proposal is having its intended outcomes and not resulting in any unintended negative consequences for people in regards to their protected characteristics. |

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| Socio Economic Disadvantage | The indication is that the proposal will have a positive impact; however, systems will be in place that will allow officers to check that the proposal is having its intended outcomes and not resulting in any unintended negative consequences for people in regards to social economic disadvantages. |
| Community Cohesion/ Social Exclusion/Poverty | The indication is that the proposal will have either a positive or neutral impact, however systems will be in place that will allow officers to check that the proposal is having its intended outcomes and not resulting in any unintended negative consequences for people in regards to the Councils community cohesion, social exclusion and poverty duties. |
| Welsh | The indication is that the proposal will have a positive impact; however, systems will be in place that will allow officers to check that the proposal is having its intended outcomes and not resulting in any unintended negative consequences for people in regards to the use of the Welsh language. |
| Biodiversity | Not applicable to this proposal. |
| Well-being of Future Generations | The indication is that the proposal will have a positive impact; however, systems will be in place that will allow officers to check that the proposal is having its intended outcomes and not resulting in any unintended negative consequences for people in regards to the five ways of working. |

Overall Conclusion

Please indicate the conclusion reached:

- **Continue** - as planned as no problems and all opportunities have been maximised

Please provide details of the overall conclusion reached in relation to the initiative

Overall this proposal will have a positive impact and processes are in place to monitor the impact for any unintended negative consequences.

The intention is to establish an approved list of providers that can offer a managed accounts and payroll support services to people that would like to receive a direct payment but are unable to oversee the management of those areas. As such this proposal opens up direct payments to all eligible people that would like to have their needs met in this way.

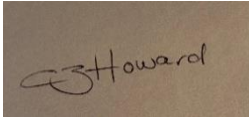
The proposal does not create a change that will disadvantage a particular group and does not impact on available resources that can be deployed to support people that require support for which this service may not be appropriate for.

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? |
|--|--|-----------------------------------|---|
| Analysis of any complaints and safeguarding referrals relating to the Service by the Common Commissioning Unit | Chelé Zandra Howard | As required | Monitoring report |
| Analysis of Provider monitoring data by the Common Commissioning Unit | Chelé Zandra Howard | Annually | Monitoring report |
| Provider to implement monitoring systems | Provider | Before service commences | Monitoring reports |
| Process to include questions regarding equalities legislation | Chelé Zandra Howard | In line with procurement timeline | Procurement questions to include relevant questions |

12. Sign off

| | Name | Position | Signature | Date |
|---------------|---------------------|------------------|---|----------|
| Completed by | Chelé Zandra Howard | PO Commissioning |  | 28/07/22 |
| Signed off by | Angela Thomas | Head of Service | A.Thomas | 28/07/22 |