

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	Sarah Hockin	Commissioning Officer	21/11/2023

1. Details of the initiative

	Title of the Initiative: Business Case to consult on VAWDASV Emergency Accommodation
1a	Service Area: Housing and Communities
1b	Directorate: Social Services, Health & Housing
1c	Summary of the initiative: To seek Members' approval to conduct a consultation exercise to understand how the VAWDASV emergency accommodation should be modelled for the future in Neath Port Talbot
1d	Is this a 'strategic decision'? Yes
1e	Who will be directly affected by this initiative? People aged 16+ who are seeking VAWDASV emergency accommodation
1f	When and how were people consulted? Permission is sought from Members for Officers to undertake a consultation period of 90 days, consisting of online surveys, face to face engagement including 1-2-1 or group sessions and stakeholder forums. The format will be dependent on the client group and support available to facilitate the engagement.

	To date officers have consulted with Providers, Service Users and other stakeholders to develop the business case to consult on the remodel proposal.
1g	<p>What were the outcomes of the consultation?</p> <p>The consultation identified a number of gaps in the emergency accommodation provision, which includes multiple complex needs, families with older male children, transgender, males and some religious or cultural beliefs.</p>

2. Evidence

What evidence was used in assessing the initiative?

- Monitoring of the services,
- Data submitted to the Common Commissioning Unit as part of ongoing reporting processes
- Housing Support Grant Outcomes data which is routinely collected and reported to Welsh Government.
- Data on people accessing Housing Support Grant funded Floating Support services
- Neath Port Talbot Rapid Rehousing Transition Plan [Rapid Rehousing Transition Plan \(npt.gov.uk\)](http://npt.gov.uk)

- Age/ Gender

Age Range	Female	Male	Other / Not Known	Non-Binary
16-17	0	0	0	0
18-24	6	0	0	0
24-34	39	0	0	0
35-49	38	0	0	0
50-64	10	0	0	0

65+	1	0	0	0
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- Ethnicity

Asian or Asian British	1
Black, Black British, Caribbean or African - African	1
Black, Black British, Caribbean or African - Other	2
Mixed or multiple ethnic groups	4
Mixed or multiple ethnic groups - Other	3
Other ethnic group	1
White - any other White background	5
White - Welsh, English, Scottish, Northern Irish or British	77

- Religion

Christian (all denominations)	13
Muslim	2
None	72
Not known	7

- Sexuality

Bisexual	5
Gay or Lesbian	1
Heterosexual	88

- Breakdown of Disability

None	85
Not known	1
Yes - Learning Disability	1
Yes - Mental Health	1
Yes - Physical & mental	2
Yes - Physical disability	4

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 majority (82%) of people receiving a service are aged between 24 - 49, with small numbers of survivors above and below this age range accessing the services.</p> <p>The proposal should have a positive impact as the aim is to offer people aged 16+ with safe, secure accommodation which meets their needs, through the provision of more flexible, personalised and outcome focused services.</p> <p>The proposal options could make changes to the eligibility criteria of service users, opening services to a wider range of survivors.</p> <p>All staff members will or have received equality and diversity training.</p>

			<p>In line with a Housing Support Grant contract, providers of domestic abuse services will develop a support plan, and safety plan in conjunction with the service user which is person centred and will take into account any specific requirements resulting from a persons protected characteristic to ensure that there is equality of outcomes.</p> <p>Contracts with commissioned providers have clauses relating to ensuring compliance with the relevant equalities legislation.</p> <p>Commissioned services are funded by the Housing Support Grant and monitoring will take place to ensure that that providers meet the Grant conditions, including any that relate to equality and diversity.</p> <p>All services operating on behalf of Neath Port Talbot County Borough Council are monitored by the Common Commissioning Unit, which includes receiving staff and service user feedback. The Unit will also analyse any complaints and safeguarding referrals relating to the services. This will ensure that the Council can identify if there are any concerns about the service, including any unintended/unidentified negative impacts on people with a protected characteristic.</p> <p>Commissioned providers are contractually required to implement monitoring systems, which will also help to identify if any aspect of the service has led to unintended/unidentified negative impacts on people with a protected characteristic.</p> <p>Commissioned services will have monitoring systems in place to ensure that staff are adequately trained and meet relevant standards. Further monitoring systems are in place to ensure that the services delivered are of a good quality and meet people's personal outcomes. These monitoring systems will also enable the services to identify whether there are unintended consequences which may impact on people with a protected characteristic.</p>
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			<p><u>Undertaking Consultation</u></p> <p>The consultation will enable any stakeholders impacted by the proposed options to highlight if there are increased negative impacts due to a persons protected characteristics.</p> <p>The consultation exercise will be undertaken in a range of mediums to ensure that people with a protected characteristic are able to fully participate, including easy read documents, face to face discussions and questionnaires.</p>
Disability	X		<p>The majority of people (90%) receiving a service do not have a disability. Of those who identify a disability (10%), the majority have a physical disability.</p> <p>The proposal should have a positive impact as the aim is to offer people safe, secure accommodation which meets their needs, through the provision of more flexible, personalised and outcome focused services.</p> <p>The proposal options could make changes to the eligibility criteria of service users, opening services to a wider range of survivors.</p> <p>All staff members will or have received equality and diversity training.</p> <p>In line with a Housing Support Grant contract, providers of domestic abuse services will develop a support plan, and safety plan in conjunction with the service user which is person centred and will take into account any specific requirements resulting from a persons protected characteristic to ensure that there is equality of outcomes.</p> <p>Contracts with commissioned providers have clauses relating to ensuring compliance with the relevant equalities legislation.</p>

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Gender reassignment	X		<p>Current refuge provision is only accessible by those who born as, and still identify as female. There is no provision for survivors who have reassigned gender.</p> <p>The proposal should have a positive impact as the aim is to increase the accommodation options available to offer individuals across all genders and gender identities, with safe, secure accommodation which meets their needs, through the provision of more flexible, personalised and outcome focused services.</p> <p>The proposal options could make changes to the eligibility criteria of service users, opening services to a wider range of survivors.</p> <p>All staff members will or have received equality and diversity training.</p> <p>In line with a Housing Support Grant contract, providers of domestic abuse services will develop a support plan, and safety plan in conjunction with the service user which is person centred and will take into account any specific requirements resulting from a persons protected characteristic to ensure that there is equality of outcomes.</p> <p>Contracts with commissioned providers have clauses relating to ensuring compliance with the relevant equalities legislation.</p> <p>Commissioned services are funded by the Housing Support Grant and monitoring will take place to ensure that that providers meet the Grant conditions, including any that relate to equality and diversity.</p>

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Marriage & civil partnership	X		<p>People who access services may be married or in a civil partnership. Staff that deliver the service may be married or in a civil partnership.</p>

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Pregnancy and maternity		X	<p>It is possible that people accessing services will have a protected characteristic due to their pregnancy/maternity status.</p> <p>Employees of providers may have a protected characteristic due to their pregnancy/maternity status.</p> <p>There are contractual clauses within the commissioned provider contracts relating to compliance with employment law.</p>

			<p>Staff recruitment will be in line with HR policies, process and all relevant legislation.</p> <p>The proposal should have a positive impact as the aim is to offer people with safe, secure accommodation which meets their needs, through the provision of more flexible, personalised and outcome focused services.</p> <p>The proposal options could make changes to the eligibility criteria of service users, opening services to a wider range of survivors.</p> <p>All staff members will or have received equality and diversity training.</p> <p>Providers of domestic abuse services will develop a support plan, and safety plan in conjunction with the service user which is person centred and will take into account any specific requirements resulting from a persons protected characteristic to ensure that there is equality of outcomes.</p> <p>Contracts with commissioned providers have clauses relating to ensuring compliance with the relevant equalities legislation.</p> <p>Commissioned services are funded by the Housing Support Grant and monitoring will take place to ensure that that providers meet the Grant conditions, including any that relate to equality and diversity.</p> <p>All services operating on behalf of Neath Port Talbot County Borough Council are monitored by the Common Commissioning Unit, which includes receiving staff and service user feedback. The Unit will also analyse any complaints and safeguarding referrals relating to the services. This will ensure that the Council can identify if there are any concerns about the service, including any unintended/unidentified negative impacts on people with a protected characteristic.</p>
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Race	X		<p>Services are delivered across all ethnic groups, with the majority (82%) of people receiving a service identifying as 'White British', a further 5% as 'White Other', 4% as 'Mixed Ethnic Group', 3% as 'Mixed Ethnic Group Other', 2% as 'Black, Black British, Caribbean or African – Other', 1% as 'Asian, 1% as Black, Black British, Caribbean or African – African' and 1% 'Other Ethnicity'</p> <p>Employees of providers may have a protected characteristic due to their race.</p>

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Religion or belief	X		<p>The services are delivered to people across all religions/beliefs. 77% of individuals reported not having an identified religious belief.</p> <p>Employees of providers may have a protected characteristic due to their religion/belief.</p> <p>The proposal should have a positive impact as the aim is to offer people aged with safe, secure accommodation which meets their needs, through the provision of more flexible, personalised and outcome focused services.</p>

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Sex	X		<p>Current Refuge provision is only accessible by those who born as, and still identify as female.</p> <p>The proposal should have a positive impact as the aim is to increase the accommodation options available to offer males with safe, secure accommodation which meets their needs, through the provision of more flexible, personalised and outcome focused services.</p> <p>The proposal options could make changes to the eligibility criteria of service users, opening services to a wider range of survivors, including males.</p> <p>All staff members will or have received equality and diversity training.</p> <p>In line with a Housing Support Grant contract, providers of domestic abuse services will develop a support plan, and safety plan in conjunction with the service user which is person centred and will take into account any specific requirements</p>

			<p>resulting from a persons protected characteristic to ensure that there is equality of outcomes.</p> <p>Contracts with commissioned providers have clauses relating to ensuring compliance with the relevant equalities legislation.</p> <p>Commissioned services are funded by the Housing Support Grant and monitoring will take place to ensure that that providers meet the Grant conditions, including any that relate to equality and diversity.</p> <p>All services operating on behalf of Neath Port Talbot County Borough Council are monitored by the Common Commissioning Unit, which includes receiving staff and service user feedback. The Unit will also analyse any complaints and safeguarding referrals relating to the services. This will ensure that the Council can identify if there are any concerns about the service, including any unintended/unidentified negative impacts on people with a protected characteristic.</p> <p>Commissioned providers are contractually required to implement monitoring systems, which will also help to identify if any aspect of the service has led to unintended/unidentified negative impacts on people with a protected characteristic.</p> <p>Commissioned services will have monitoring systems in place to ensure that staff are adequately trained and meet relevant standards. Further monitoring systems are in place to ensure that the services delivered are of a good quality and meet people's personal outcomes. These monitoring systems will also enable the services to identify whether there are unintended consequences which may impact on people with a protected characteristic.</p> <p><u>Undertaking Consultation</u></p>
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Sexual orientation	X		<p>Services are delivered across all sexual orientations.</p> <p>Employees of providers may have a protected characteristic due to their sexual orientation.</p> <p>The proposal should have a positive impact as the aim is to offer people 16 with safe, secure accommodation which meets their needs, through the provision of more flexible, personalised and outcome focused services.</p> <p>The proposal options could make changes to the eligibility criteria of service users, opening services to a wider range of survivors.</p> <p>All staff members will or have received equality and diversity training.</p> <p>In line with a Housing Support Grant contract, providers of domestic abuse services will develop a support plan, and safety plan in conjunction with the service user which is person centred and will take into account any specific requirements resulting from a persons protected characteristic to ensure that there is equality of outcomes.</p> <p>Contracts with commissioned providers have clauses relating to ensuring compliance with the relevant equalities legislation.</p>

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

- Monitoring of the Services by the Common Commissioning Unit
- Analysis of any complaints and safeguarding referrals relating to the Services by the Common Commissioning Unit
- Analysis of Housing Support Grant outcome data
- Analysis of Provider monitoring data by the Common Commissioning Unit
- Obtaining feedback from stakeholders and individuals accessing services

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			Services will support people fleeing, or who have experienced domestic abuse to remain safe either in their own home or in the community. One of the key outcome areas for Housing Support Grant funded services is reducing crime and disorder.
To advance equality of opportunity between different groups	X			Services will support people fleeing, or who have experienced domestic abuse to overcome challenges in keeping themselves safe and help prevent homelessness. One of the key outcome areas for Housing Support Grant funded services is preventing institutionalisation and preventing homelessness
To foster good relations between different groups	X			Services will support people fleeing, or who have experienced domestic abuse to engage with local communities and support groups.

				One of the key outcome areas for Housing Support Grant funded services is reducing social exclusion and reducing isolation
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What action will be taken to improve positive or mitigate negative impacts?

- Monitoring of the Services by the Common Commissioning Unit
- Analysis of any complaints and safeguarding referrals relating to the Services by the Common Commissioning Unit
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- Obtaining feedback from stakeholders and individuals accessing services

4. Socio Economic Duty

Impact	Details of the impact/advantage/disadvantage
Positive/Advantage	<p>Housing Support Grant funded services support people that may be more likely to have a low socio-economic status to manage their health and wellbeing needs and enables them to achieve their personal outcomes.</p> <p>Survivors in VAWDASV emergency accommodation will continue to benefit from support that includes access to education, employment and volunteering.</p> <p>Consultation will have a positive impact as it enables stakeholders to inform decisions that impact on them.</p>
Negative/Disadvantage	

Neutral	For employees of support providers, their employment will be expected to continue. The proposal aims to offer current services to a wider range of people needing support.
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What action will be taken to reduce inequality of outcome

- Monitoring of the Services by the Common Commissioning Unit
- Analysis of any complaints and safeguarding referrals relating to the Services by the Common Commissioning Unit
- Analysis of Housing Support Grant outcome data
- Analysis of Provider monitoring data by the Common Commissioning Unit
- Obtaining feedback from stakeholders and individuals accessing services

5. Community Cohesion/Social Exclusion/Poverty

	+	-	+/-	Why will it have this impact?
Community Cohesion	X			Will help people that use the service to either return to their community or establish themselves in a new community
Social Exclusion	X			Will help people that use the service to access social opportunities and become involved in their local communities. A key outcome area for Housing Support Grant funded services includes reducing social exclusion and reducing isolation.
Poverty	X			A key outcome area for Housing Support Grant funded services includes tackling poverty. Examples of support offered by the services of these contracts include supporting people with benefit and money advice, helping people to manage their finances, helping people to budget and prevent homelessness, helping people to gain employment, education or volunteering, homelessness interventions and temporary accommodation.

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

- Monitoring of the Services by the Common Commissioning Unit
- Analysis of any complaints and safeguarding referrals relating to the Services by the Common Commissioning Unit
- Analysis of Housing Support Grant outcome data
- Analysis of Provider monitoring data by the Common Commissioning Unit
- Obtaining feedback from stakeholders and individuals accessing services

6. Welsh

	+	-	+/-	Why will it have this effect?
What effect does the initiative have on: – people’s opportunities to use the Welsh language	X			There will continue to be a requirement for commissioned providers and in-house services to deliver services to the service users in their chosen first language. Commissioned providers are bound by employment legislation relating to the Welsh Language
– treating the Welsh and English languages equally	X			There will continue to be a requirement for commissioned providers and in-house services to deliver services to the service users in their chosen first language. Commissioned providers are bound by employment legislation relating to the Welsh Language

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

- Monitoring of the Services by the Common Commissioning Unit
- Analysis of any complaints and safeguarding referrals relating to the Services by the Common Commissioning Unit
- Analysis of Housing Support Grant outcome data
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- Obtaining feedback from stakeholders and individuals accessing services

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

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

N/A.

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
<p>i. Long term – looking at least 10 years (and up to 25 years) ahead</p>	<p>With the proposed options of VAWDASV emergency accommodation there is the opportunity to support a wider range of people to achieve their long term health and wellbeing outcomes, stabilise their housing situation and play an essential part in supporting them to live safely within their own homes and local communities.</p> <p>The aim is to help to ensure that there are sustainable services that are more responsive to people’s individual need.</p> <p>Consultation will ensure that stakeholders views inform final proposals, which will help to ensure long term sustainability of any option that is taken forward.</p>
<p>ii. Prevention – preventing problems occurring or getting worse</p>	<p>The proposal focus on preventing individuals from becoming homeless, stabilising their housing situation, or helps people to find and keep accommodation, as well as:</p> <ul style="list-style-type: none"> • Tackling Poverty • Reducing Social Exclusion and Isolation • Preventing Institutionalisation, and • Reducing Crime and Disorder <p>Consultation will ensure that proposals are informed by stakeholders, this will prevent decision making that results in a deterioration of outcomes.</p>
<p>iii. Collaboration – working with other services internal or external</p>	<p>Work has been undertaken in partnership with key stakeholders including support providers, Registered Social Landlords, Community Safety Partnership and Housing Options.</p> <p>The services will work with other organisations to support individuals who are fleeing, or have experienced domestic abuse, including Health, Social Services, and South Wales Police.</p>

	The consultation process will enable a collaborative approach to informing proposals.
iv. Involvement – involving people, ensuring they reflect the diversity of the population	<p>The aim of the proposal is to address gaps in service provision, enabling support services to be offered to a more diverse range of client groups, thereby providing support which is more flexible to people’s individual needs. Feedback from current and previous service users, service providers (including staff), and the wider public will be sought as part of the consultation and proposal evaluation process. Ongoing feedback on service provision will also be sought as a matter of course post-consultation for whichever service model is commissioned.</p> <p>Providers are required to undertake engagement with those that use their services to help inform service improvement as part of their contract.</p> <p>The consultation process will ensure that all stakeholders are involved in informing the proposals.</p>
v. Integration – making connections to maximise contribution to:	<p>Services are underpinned by the values and principles of the Housing Support Grant and the Well-Being of Future Generations Act 2015 and the Councils wellbeing objectives.</p> <p>Consultation maximises stakeholders’ ability to inform decisions that impact on them.</p>
Council’s well-being objectives	<p>To improve the well-being of all adults who live in the county borough by delivering services that support their independence and safeguards them from harm.</p> <p>To develop the economy and the environment so that the well-being of people can be improved.</p>
Other public bodies objectives	Street Vulnerable Multi Agency Risk Assessment Committee, Area Planning Board, Community Safety Partnership, Homelessness review & strategy, VAWDASV strategy and leadership group.

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.

- Monitoring of the Services by the Common Commissioning Unit
- Analysis of any complaints and safeguarding referrals relating to the Services by the Common Commissioning Unit
- Analysis of Housing Support Grant outcome data
- Analysis of Provider monitoring data by the Common Commissioning Unit
- Obtaining feedback from stakeholders and individuals accessing services

10. Assessment Conclusions

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

	Conclusion
Equalities	<p>Overall there will be more positive than negative impacts associated with this proposal. Any potential negative impacts can be mitigated and the positive impacts outweigh the negative. In addition the proposal does not create a change that will disadvantage a particular group.</p> <p>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 with a protected characteristic.</p>
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 it 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 a positive impact, however systems will be in place that will allow officers to check that it is having its intended outcomes and not resulting in any unintended

	negative consequences for people in regards to community cohesion, social exclusion and/or poverty.
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 it is having its intended outcomes and not resulting in any unintended negative consequences for people wishing to use the Welsh Language.
Biodiversity	N/A
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 it is having its intended outcomes and not resulting in any unintended negative consequences against the aims of the well-being of Future Generations.

Overall Conclusion

Please indicate the conclusion reached:

- **Continue** - as planned as no problems and all opportunities have been maximised
- **Make adjustments** - as potential problems/missed opportunities/negative impacts have been identified along with mitigating actions
- **Justification** - for continuing with the initiative even though there is a potential for negative impacts or missed opportunities
- **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 proposal options will have a positive impact and processes are in place to monitor the impact of any unintended negative consequences.

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.

The proposal explores how VAWDASV emergency accommodation services can become more diversified and accessible to a wider range of client groups.

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?
Monitoring of the Services by the Common Commissioning Unit	PO Commissioning	Annually	Monitoring reports
Analysis of any complaints and safeguarding referrals relating to the Services by the Common Commissioning Unit	PO Commissioning	Ongoing as they are received	Investigation reports and corrective action plans
Analysis of the Housing Support Grant Outcomes by the Common Commissioning Unit	PO Commissioning	As they are published	Monitoring reports
Analysis of Provider monitoring data by the Common Commissioning Unit	PO Commissioning	Annually	Monitoring reports
Ensure contracts have clauses relating to compliance with relevant equalities legislation	PO Commissioning	Before service commences	Contract
Ensure contracts have clauses around Welsh Language	PO Commissioning	Before service commences	Contract
Providers to implement own monitoring systems	Provider	On commencement of service	Monitoring reports
Service to have in place processes and policies to ensure that there is equality of access and that the individual	Provider	On commencement of service	Monitoring reports

requirements of the person are supported.			
Service to put in place individual support plans that take into account any specific requirements resulting from a persons protected characteristic to ensure that there is equality of outcomes.	Provider	Before service commences with the service user	Monitoring reports

12. Sign off

	Name	Position	Signature	Date
Completed by	Sarah Hockin	Commissioning Officer	S.Hockin	22/11/2023
Signed off by	Chele Howard	Head of Service/Director		05/01/2024