#### Appendix 4: Equality Impact Assessment (EIA) Report

This form should be completed for each Equality Impact Assessment on a new or existing function, a reduction or closure of service, any policy, procedure, strategy, plan or project which has been screened and found relevant to equality.

## Please refer to the 'EIA Report Form Guidance' while completing this form. If you need further support please contact <u>accesstoservices@swansea.gov.uk</u>.

Where do you work?	
Service Area: Adult Services	
Directorate: People	
a) This EIA is being completed for a:	

# Service/Policy/Policy/FunctionProcedureProjectStrategyPlanImage: StrategyImage: Strategy

#### (b) Please name and <u>describe</u> here: Proposed Closure of Parkway Residential Care

Following the commissioning review of Residential care for older people (2016), the preferred option is now progressing for decision – in summary the proposal is to shape the internal provision of residential care to focus on complex care needs, short-term residential reablement and respite care. To achieve this change resources will need to be focused upon specialisms and as a result 'standard' / non- complex residential care provision will no longer be provided by the Council. Standard /non-complex residential care will be provided via our externally commissioned services only. The change would also mean a concentration of staff resources and skills to ensure the necessary specialists and the right environment are in place to achieve our resident's outcomes.

By adopting the preferred options and developing its provision in relation to complex care, the Council will be able to provide better care for people with complex needs such as dementia. This is an identified area of need that the independent sector struggles to meet.

Refocussing internal provision in this way will hopefully allow the Council to provide better services and care for its residents. It will also provide market certainty for the independent sector surrounding the commissioning of standard residential care.

The Council also recognises that to deliver this vision of an improved residential care offer will require significant capital investment and this requirement has been added to the Council's Capital programme for the next 5 years.

By concentrating its resources on these specialisms, the Council will work towards providing an improved service for residents in Swansea, but will need less in-house beds to provide these specialisms.

This consolidation of resources can be achieved through the closure of one residential care home identified as Parkway Residential care home following an evaluation exercise to determine the Council home least fit for purpose to deliver the preferred future model

(c) It was initially screened for relevance to Equality and Diversity on: 25/01/15, December 2016 & March 2017. This EIA has been continually updated alongside the consultation process. The report outlines the final impact taking into account the outcomes of the consultation.

#### (d) It was found to be relevant to...

Children/young people (0-18)	
Older people (50+)	$\boxtimes$
Any other age group	$\boxtimes$
Disability	$\boxtimes$
Race (including refugees)	$\boxtimes$
Asylum seekers	
Gypsies & Travellers	
Religion or (non-)belief	
Sex	

#### (e) Lead Officer

Name: Cathy Murray

Job title: Principal Officer Service Provision

Date: 17th August 2018

Sexual orientation	
Gender reassignment	
Welsh language	$\square$
Poverty/social exclusion	$\square$
Carers (including young carers)	$\boxtimes$
Community cohesion	
Marriage & civil partnership	
Pregnancy and maternity	

#### (f) Approved by Head of Service

Name: Alex Williams

Date: 17<sup>th</sup> August 2018

#### Section 1 – Aims (See guidance):

#### Briefly describe the aims of the initiative:

#### What are the aims?

In line with the principles of the Social Services and Wellbeing (Wales) Act, the model agreed for Adult Services in 2016 had the following principles at its core:

- Better prevention
- Better early help
- A new approach to assessment
- Improved cost effectiveness
- Working together better
- Keeping people safe

It was agreed through an options appraisal and consultation that in order to best meet these strategic priorities a remodelling of our internal provision was needed with a focus on complex care, short-term residential reablement and respite. The focus of the service would be about aiming to achieve better outcomes for people with reablement and greater independence for both residents and carers at its core.

In line with the key principle of better prevention, if the proposed model for Residential Care is implemented the Council will be able to designate more 'in-house' beds as respite provision, which will allow carers greater certainty and planning surrounding respite arrangements helping them to keep their loved ones at home for longer by providing them with a much needed break.

The reablement provision within Residential Care will also be further developed to better support people when leaving hospital or when they are finding it difficult to stay at home without support. Again, in line with the key principles of better prevention and early intervention, providing people with support in this way allows them to regain skills and independence to return to their own homes in line with their desired personal outcomes.

To achieve these objectives, if the Residential Care Model is approved by Cabinet, following public consultation the changes would be as listed below

- The closure of Parkway Residential Home.
- Gradual phase out of standard residential care in the remaining five Swansea Council Residential Care homes. (Ty Waunarlwydd, Bonymaen House, St Johns, Rose Cross House and The Hollies)
- Some residents at Parkway would need to relocate to independent sector homes.
- No new admissions for standard residential care in Local Authority provision. This will mean that those individuals who wish to access standard residential care in the future will access independent sector provision only

Who has responsibility? Head of Adult Services – Alex Williams

Head of Adult Services – Alex William

#### Who are the stakeholders?

- Current residents
- Carers / Families
- ABMU Health Board representatives (including Older People Mental Health and Therapies)

<ul> <li>Cabinet and Elected Members (including political and on majority, representing areas across Swansea)</li> </ul>	opposition
<ul> <li>Provider Staff (including, Managers, Care Officers and Drivers</li> </ul>	3)
External Residential Care providers	,
Future Residents	
<ul> <li>Integrated Community Services staff (Social Work Team Social Workers and Care Management Officers)</li> </ul>	Leaders,
<ul> <li>Officers from Social Services (including key Budget Commissioning, Safeguarding, Direct Payments, Loc Coordinator).</li> </ul>	
<ul> <li>Officers from Corporate departments (accountancy, human relegal, commercial &amp; commissioning unit, health &amp; safety, scrutiny and property)</li> </ul>	
Union representation (GMB, UCATT and Unison)	
Older Peoples Commissioner	
Council Sheltered Housing complexes	
<ul> <li>Other organisations e.g SCVS, Carers centre, Age concern, D Group, Contracted independent providers, Swansea Dement Network, Ageing Well Steering group</li> </ul>	

# **Section 2 - Information about Service Users** (See guidance): Please tick which areas you have information on, in terms of service users:

Children/young people (0-18)	
Older people (50+)	$\boxtimes$
Any other age group	$\boxtimes$
Disability	$\boxtimes$
Race (including refugees)	$\boxtimes$
Asylum seekers	
Gypsies & Travellers	
Religion or (non-)belief	$\boxtimes$
Sex	$\square$

Sexual orientation	
Gender reassignment	
Welsh language	$\square$
Poverty/social exclusion	
Carers (including young carers)	$\boxtimes$
Community cohesion	
Marriage & civil partnership	$\boxtimes$
Pregnancy and maternity	

#### **Information about Parkway Residential Care staff (See guidance):** Please tick which areas you have information on, in terms of affected staff members:

Children/young people (0-18)	
Older people (50+)	$\boxtimes$
Any other age group	$\boxtimes$
Disability	$\boxtimes$
Race (including refugees)	$\boxtimes$

Sexual orientation	
Gender reassignment	
Welsh language	$\square$
Poverty/social exclusion	
Carers (including young carers)	$\square$

Asylum seekers	
Gypsies & Travellers	
Religion or (non-)belief	$\boxtimes$
Sex	$\boxtimes$

Community cohesion	
Marriage & civil partnership	$\square$
Pregnancy and maternity	

### Please provide a snapshot of the information you hold in relation to the protected groups above:

#### Information held on Service Users:

Within Adult services we hold client records for all service users on the PARIS client management system which provides greater detail around all of the protected groups. Unfortunately these records do not capture all of the service user information as a mandatory requirement nor can it easily disaggregate records to specific services i.e we cannot pull information on clients based on the services they use.

Therefore, Residential Care Services staff capture information on their clients manually on site. This information has been collated as part of the Impact Assessment report for the identified site for potential closure.

There are currently 17 residents in Parkway Residential Care home and we know the following in relation to them:

Age	Gender	Nationality	Disability	Religion	Marital Status
86yrs	Female	British	Yes	N/K	Single (never married)
78yrs	Female	British	Yes	N/K	Widowed
96yrs	Female	British	Yes	N/K	Widowed
89yrs	Female	Welsh	Yes	N/K	Widowed
80yrs	Female	British	Yes	N/K	Widowed
88yrs	Male	British	Yes	Catholic	Widowed
89yrs	Male	Scottish	Yes	Scotland	Widowed
98yrs	Female	British	Yes	N/K	Widowed
89yrs	Female	British	Yes	N/K	Widowed
95yrs	Female	British	Yes	N/K	Widowed
81yrs	Female	British	Yes	N/K	Widowed
89yrs	Female	British	Yes	Welsh Church	Widowed
88yrs	Female	British	Yes	N/K	Widowed
97yrs	Male	British	Yes	N/K	Widowed
89yrs	Female	British	Yes	N/K	Widowed
87yrs	Female	British	Yes	N/K	Single (never married)
88yrs	Female	British	Yes	N/K	Widowed

We have not captured information on ethnicity, but knowledge of the residents means that we know that none come from BME groups.

There were 34 staff potentially affected by the proposals. Information held on Staff at Parkway Residential Care Home is as follows (NULL indicates where the information has not been recorded):

Gender	Age	Marital Status	Nationality	Registered Disabled	Sexual Orientation	Religion	Carer	Welsh
Female	44	Married	NULL	NULL	NULL	NULL	NULL	NULL
Female	62	Married	NULL	NULL	NULL	NULL	NULL	NULL
Female	27	Single	British	NULL	NULL	NULL	NULL	NULL
Female	49	Divorced	Welsh	NULL	NULL	NULL	NULL	NULL
Female	42	Married	British	NULL	NULL	NULL	NULL	NULL
Female	41	Single	Welsh	NULL	Hetrosexual/	No	Yes	NULL
					Straight	Religion		

						or Belief		
Female	32	Single	Welsh	NULL	NULL	NULL	NULL	NULL
Male	48	Divorced	NULL	NULL	NULL	NULL	NULL	NULL
Female	42	Living with Partner (Not Married)	Welsh	NULL	NULL	NULL	NULL	NULL
Female	63	Widowed	NULL	NULL	Hetrosexual/ Straight	NULL	No	NULL
Female	32	Married	Welsh	NULL	NULL	NULL	NULL	NULL
Male	31	Married	British	NULL	Hetrosexual/ Straight	No Religion or Belief	No	NULL
Female	52	Divorced	NULL	NULL	NULL	NULL	NULL	NULL
Female	43	Single	British	NULL	NULL	No Religion or Belief	Yes	NULL
Female	52 52	Separated but still legally married Single	British British	NULL	NULL	NULL	NULL	NULL
Female	40	Living with Partner (Not Married)	Pritich		NULL			
Female	49	Married)	British	NULL		NULL	NULL	NULL
Female	49	Married	NULL	NULL	NULL	NULL	NULL	NULL
Female	43	Married Living with Partner (Not	NULL	NULL	NULL	NULL	NULL	NULL
Female	28	Married)	Welsh	NULL	NULL Hetrosexual/	NULL	NULL	NULL
Female	47	Married	British Zimbabwean/	NULL	Straight Hetrosexual/	NULL	Yes	NULL
Female	59 59	Married Divorced	Refugee NULL	NULL	Straight NULL	Christian NULL	Yes NULL	NULL NULL
Female								
Male	33	Single	British	NULL	NULL	NULL	NULL	NULL
Female	26	Single	Welsh	NULL	NULL	NULL	NULL	NULL
Female	28	Single	Welsh	NULL	Gay/Lesbian	NULL	Yes	Yes
Female	44	Single	NULL	NULL	NULL	NULL Prefer Not To	NULL	NULL
Female	46	Single	British	NULL	Hetrosexual/Straight	Say	NULL	NULL
	51	Married	British	NULL	Hetrosexual/Straight	Christian	NULL	NULL
Female	58	Single	Welsh	NULL	Hetrosexual/Straight	Christian	NULL	NULL
Female Female	48	Married	NULL	NULL	NULL Hetrosexual/	NULL	NULL	NULL
Fomala	49	Single	Portuguese	NULL	Straight	NULL	Yes	NULL
Female Female	25	Single	British	NULL	NULL	NULL	NULL	NULL
	44	Single	NULL	NULL	NULL	NULL	NULL	NULL
Female	49	Single	NULL	NULL	NULL	NULL	NULL	NULL
Female	53	Single	British	NULL	Hetrosexual/	Prefer Not To	NULL	NULL
Female		•			Straight	Say		
Female	63 22	Married Welsh	NULL British	NULL	NULL Hetrosexual/ Straight	NULL Christian	NULL	NULL NULL
Male	 51	Single	British	NULL	NULL	NULL	NULL	NULL
Female	46	Divorced	British	NULL	Hetrosexual/ Straight	Christian	No	NULL

Male	32	Single	British	NULL	NULL	NULL	NULL	NULL
Female	40	Single	Welsh	NULL	NULL	NULL	NULL	NULL
Female	61	Married	NULL	NULL	NULL	NULL	NULL	NULL

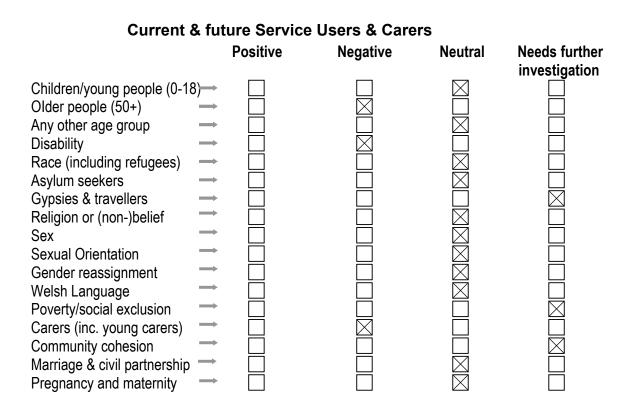
#### Any actions required, e.g. to fill information gaps?

As described manual records need to be maintained in relation to service user details on site at Parkway.

Swansea council alongside regional partners including the Local Health Board are progressing with the implementation of the Welsh Community Care Information System – this will hold client records for all local authority and Health services and replace the current PARIS client management system used within Adult Social Services. The new system will be developed to better capture and easily extract information around our service users and protected characteristics.

Staff are encouraged to provide their profile details on our IT system, however this is not mandatory. We will continue to publicise and encourage all our staff to complete.

# **Section 3 - Impact on Protected Characteristics** (See guidance): Please consider the possible impact on the different protected characteristics.



Thinking about your answers above, please explain in detail why this is the case.

#### Negative Impacts:

- Older people
- Disability
- Carers

We recognise that the proposed closure of Parkway Residential Home specifically cannot be viewed as having a positive impact on current residents (many of whom have a disability) and carers. With this in mind of paramount importance is how move on arrangements for residents is managed to ensure all current residents with complex experience minimal impact to their wellbeing.

The key potential adverse impacts of the proposal to close Parkway on people with protected characteristics particularly older people and carers are as follows:

- The wellbeing of older people living at Parkway could be affected if it were to close and they had to move to alternative homes.
- There is potential that there could be inadequate choice of alternative care homes for the older people affected if Parkway were to close.
- There may also be a potential financial impact on service users and families of Parkway Residential Care Home if people have to move to the independent sector as third party top up fees might apply.
- There is a risk that if residents from Parkway had to move, the quality of care for those older people affected could be adversely affected.
- All of the above had a potential adverse impact on carers due to the overall stress and worry of the situation, and being concerned about their loved ones.

We have demonstrated in Section 4 of this EIA how we have mitigated each of the above.

#### Neutral Impact:

- Children and young people
- Any other age group
- Race
- Religion or (non) belief
- Sex
- Sexual Orientation
- Gender Reassignment
- Welsh Language
- Asylum seekers
- Marriage and civil partnership
- Pregnancy and maternity

Although we have limited information on the individual protected characteristics of residents, all eligible needs of current residents at Parkway will be met, regardless of protected characteristic. All residents will be supported to find an alternative placement which meets their needs. There will be a disproportionate impact on females, as the majority of the residents are female; however again all needs to be will be met regardless of gender.

Asylum seeks with no recourse to public funds would not be eligible for social care services,

unless their human rights were breached.

#### Needs Further investigation:

- Gypsies & Travellers
- Poverty/Social Exclusion
- Community Cohesion

It is recognised that not enough information is held in relation to the areas listed above to fully understand the impact of the proposals relating to Parkway. However, the impact on gypsies and travellers is likely to be limited, but we don't know for certain whether any resident has come from a gypsy and traveller community.

In terms of community cohesion If a decision is made to close Parkway, the Council will ensure that the Parkway site is released to support accommodation needs of older people, whether this be age-friendly accommodation to encourage independent living or use of the home itself by the independent sector.

The EIA will remain open until such time as Parkway is closed, and these areas will be investigated further. However, it is considered that there is unlikely to be a significant impact on these areas as all residents are known to us and any adverse impacts can be mitigated.

#### Staff Impacts:

There are 34 staff that currently work at Parkway Residential home who would be impacted on if a decision is made to close this home.

The majority of staff are female, so there is a disproportionate impact on females.

Staff have attended meetings and have been kept informed throughout the consultation and encouraged to take part in the 12 week staff consultation process. One to One meetings have also been offered to staff with management, HR and Unions to explain how the proposal will affect them and the redeployment process. Monthly meetings have been held by management/HR with Unions.

Staff have been offered to attend relevant training courses e.g. Selling You.

Swansea Council is committed to minimising compulsory redundancies. All staff at risk have been given access to the Redeployment list (our normal procedure for staff at risk. They have also been provided with a list of vacancies within the service area and advised that anything advertised will now be a temporary contract so vacancies will be made available to these staff at risk.

If a decision is made to close Parkway staff will be issued with formal notice, with Parkway likely to close by January 2019.

Mitigation in relation to staff is included within Section 4 of this EIA.

#### Section 4 - Engagement:

Please consider all of your engagement activities here, e.g. participation, consultation, involvement, co-productive approaches, etc.

# What engagement has been undertaken to support your view? How did you ensure this was accessible to all?

A 12 week stakeholder consultation commenced on 30/04/18 and concluded 23/07/18. Documents were provided in English and Welsh and were available in large print on request. Staff also helped with explanations of the proposals to residents and family as necessary. We identified the preferred language of the affected Services Users when communicating with them during the consultation

Consultation information was provided via Corporate communications to staff, details were put on intranet and Council's website and the consultation was promoted through the Media, Facebook and Twitter.

A Stakeholder Map was created with the service which identified stakeholders and has been used by the service to evidence engagement with the stakeholders: -.

Consultation with stakeholders was as follows:

- All Councillors were briefed regarding the proposals
- Ward Councillors Cllr Child, the Cabinet Member, spoke to or offered to speak to relevant Ward Councillors
- AM/MPs letter issued to raise awareness of consultation
- Older Peoples Commissioner letter issued to raise awareness of consultation
- Trade Unions Initial meeting held with Management/HR and Unions. Meetings were held on an ongoing basis as necessary
- Library Managers briefed and provided copies of hardcopy questionnaires and displayed in all libraries
- Contact Centre Manager briefed to inform all relevant Contact Centre/Switchboard staff of consultation. Hardcopy questionnaires available in CC and Guildhall reception
- Email or letters sent to all identified relevant stakeholders raising awareness of the consultation and offering to attend any meetings if required
- All external residential homes were made aware of the consultation.
- The Head of Adult Services met with the Disability Liaison Group to raise awareness of consultation.
- Swansea Council sheltered complexes hardcopy questionnaires issued.
- The following was also undertaken with those residents directly affected at Parkway and their families and carers:
- 1. Bilingual Letters issued pre consultation and letters/questionnaires issued during consultation.

2. Consultation meetings took place at Parkway with residents and families on 8th May 2018, 21st May 2018, 5th June 2018 and 6th June 2018. Parkway staff also attended to provide any necessary support to the residents. A total of 7 Residents and 25 family members/carers attended these meetings. Not all residents attended the meetings, as some had limited mental capacity. However, the families of all but one resident attended at least one meeting and the remaining resident not supported by family members attended all 4

meetings. The majority of families chose to attend each meeting, so discussion continued on from the last meeting.

3. 1 to 1s arranged as necessary at various times.

4. Social Workers met with relevant affected Service Users to complete reviews to help determine if had complex or non-complex needs to help inform their response to the consultation.

5. Other Council-run home residents were made aware of consultation by management and Welsh/English hardcopy questionnaires provided

A separate staff and Trade Union 12 week consultation ran concurrently to the wider stakeholder consultation. The staff consultation commenced on 30/04/18 and ended on 23/07/18, this exceeded the legal requirement of a 30-day consultation. It was identified that 34 staff were potentially affected at the start of the Consultation.

#### What did your engagement activities tell you? What feedback have you received?

Regarding the whole Residential Care Model and proposed closure the following response figures were received:

Info received	No. rec'd
Online Questionnaire	42
Hardcopy Questionnaires	21 Included in the 42 above
Letters	2
Emails	5
Petition with 1000 names	1
TOTAL	50

42 respondents completed the questionnaire either online or on paper. The responses to both the paper and online questionnaire are amalgamated below.

(NB: numbers for each question differ as do the stats as some people choose not to answer all questions)

In relation to the Residential Care services model the following summarised responses were recorded:

• Question 1. Do you agree or disagree with our proposed changes to residential care for older people? 39/42.

Strongly agree 8, Tend to agree 7, Tend to disagree 4, Strongly disagree 20

• Question 2. Please expand your answer below: 35/42 respondents commented (included in survey themes below).

Key Themes	Responses Nos
Council Homes are better - the Council provides better care than services in the	5

private sector		
In favour or enabling people to remain	2	
living independently for longer		
Impact on Choice (and Location) -	6	
reliance on independent sector for non-		
complex care reduces choice.		
Particularly in terms of location which is		
key to maintaining relationships. 1		
comment that there is not enough		
choice for respite in the independent		
sector.		
		-
Cost of Private Care Homes - third	3	
party charges mean that residents and		
their families will not be able to afford		
private care home fees.		
	<u> </u>	-
Definition of complex care - that the	1	
definition of complex care needs to be		
more specific.		
Concerns about privatigation of all	1	-
Concerns about privatisation of all council owned care homes this		
proposal may lead to closure /		
privatisation of all homes.		
Financial concerns concerned about	2	
decisions being driven by budget	2	
pressures.		
Financial Concerns Cont concerned	2	-
about private sector profit motives	_	
Support for Proposals. 4 comments	4	-
were in support of proposals. 2 of these		
were very positive, 2 were neutral		
accepting that changes were necessary.		
1 comment (from ABMU HB) was		
neutral on grounds that the proposal		
makes sense if care is available		
elsewhere (but commenting that		
calculations are not clear and		
assurances of alternatives have not		
been provided in the consultation.		
Multiple - This response highlights	1	1
concerns relating to impact on		
residents, cost to families, quality of		
care in private sector, reduced choice		
and availability of respite care.		
Availability of beds - comments about	2	1
difficulty finding care homes beds in		
independent sector.		

1 Comment that beds at LA homes are always full. 1 comment that hospital bed blocking occurs because of lack of beds.		
Staffing Extra staffing will be needed for residents with complex needs.	1	
Wellbeing - comments received related to the impact that moves will have on residents' wellbeing. Some of these concerns relate to choice and location impacts and equalities and human rights impacts.	5	
Rebablement - asked why can't Parkway be used for reablement services.	1	

• Question 3. Are there any other options you feel the Council should have looked at in relation to the Residential Care Service for Older People? - 34/42 responded (included in survey themes below).

Key Themes	Responses Nos
Alternative Suggestions - respondents proposed alternative suggestions regarding use of building or type of service / ownership at location of Parkway.	6
Care at Home - people commented that dom care services could lead to savings, or could be more appropriate than residential care	5
Save Money Elsewhere - commented that the council should prevent closure by saving money elsewhere.	4
Budget Pressures - comments that proposals are purely driven by budget pressures and do not show sufficient regard for resident welfare.	2

#### • Question 4. Considering the above, do you agree or disagree with the following...

#### The criteria used to assess each care home were the right ones. 36/42 responded.

• Strongly agree 3, Tend to agree 14, Tend to disagree 6, Strongly disagree 13

#### The proposal to close Parkway Residential care. 36/42 responded.

• Strongly agree 3, Tend to agree 8, Tend to disagree 7, Strongly disagree 17

• Question 5. If you disagree with either of the above please explain why and give any alternatives (25/42 responded). Key Themes were : -

Key Themes	Response Nos
Closing Parkway does not reflect demand - commented that the proposal does recognise current or anticipate future demand	3 (12%)
Choice, Location and cost / quality of private sector homes - comments that the location of other homes is problematic, and that private homes are more expensive or lesser quality.	2 (8%)
Convert to specialist complex – addressed above	1 (4%)
Cost shunting to NHS	1 (4%)
The council should provide nursing care	1 (4%)
Hidden agenda re development of land. Hospital discharge or respite should be promoted comment that the LA has been influenced by sale / development of local land.	1 (4%)
All attempts should have been made to keep Parkway open	1 (4%)
<b>Location -</b> comments relating to suitability of location	2 (8%)
Make Parkway more effective	1 (4%)
Options evaluation scoring / welfare of residents - comments that the scoring of the options is not clear and that the residents welfare has not been shown due regard	2 (8%)
Privatise Parkway	1 (4%)
Promote independent living	1 (4%)
Recognition for staff	1 (4%)
Services / Facilities are good	1 (4%)
The proposal is about managing	1 (4%)

decline		
Under investment in Parkway and Hidden agenda re development of land.	1 (4%)	
Welfare of residents will be impacted	3 (12%)	

Face to Face meetings at Parkway Residential Care Home recorded the following feedback and themes:

Date of meeting	Points raised			
Theme 1. Alt	Theme 1. Alternative Solutions			
05/06/2018	Family members suggested savings could be made in sheltered housing or that the service could be delivered in the independent sector.			
05/06/2018	A suggestion was made to fill the vacant beds in parkway from St Johns and close this service instead. This could be a counter proposal but it would still mean a closure and there are more residents in St Johns to move to other homes.			
05/06/2018	Another suggestion was to sell off Parkway as a going concern for someone else to run.			
05/06/2018	A suggestion was made to use Parkway as respite and gradually phase out. Family member suggested this could be a compromise in the short term and will propose this in the consultation.			
21/05/2018	Carer - Use the beds for Fairwood Hospital to avoid people having to travel			
23/05/2018	What about social enterprises / community co-operatives? Have they been considered as an option?			
08/05/2018	Why not keep Parkway and staff it properly so it can be filled. Need to spend money and to upgrade and could use for reablement as well. As this is the only local authority home in the west, it could be enhanced. Feel the decision is about money.			
08/05/2018	Why not fill the beds in Parkway for reablement.			
05/06/2018	A family member suggested a 3-5 year plan would be a better approach as changing models of care take time. They understood that money has to be saved and appreciate where the Council is coming from, but this would be a kinder way than suddenly closing a			

	care home. Closing a home naturally over time would be more compassionate.
2. Care Need	S
05/06/2018	Social workers will work with residents and families to asses if complex or not.
05/06/2018	Finally one family member requested that if the home closes, a guarantee that all residents will continue to have quality care. This is the residents' life and they will lose friends and relationships and it is hard for the families
21/05/2018	There will be no services going forward.
21/05/2018	Carer - If individual wanted to go home will there be 24/7 care provided?
21/05/2018	Carer - Private Dom Care poor, won't get the same care. Private disgrace, broken society. Parkway is a lovely home.
23/05/2018	How do we achieve prevention for those older people living at home?
23/05/2018	How can continuity of carers be achieved within domiciliary care?
23/05/2018	What will be the impact on younger adults using domiciliary care as a result of changes to older people services?
08/05/2018	What is the definition of complex needs?
08/05/2018	If only supporting people with complex needs, it is discriminatory as not providing care to others or supporting other carers.
05/06/2018	Dom Care also a worry as not get the hours paid for.
3. Financial	
05/06/2018	It was questioned if the consultation was meaningful in considering any views, which was confirmed e.g. funding top up fees if residents moved to a private care home will now be considered as part of the final report which will inform the Cabinet decision.
05/06/2018	A query was raised on how much money would be saved if the home closed in January 19?
21/05/2018	Private sector – not very good. LA home more expensive. More individuals are self-funding.
21/05/2018	Can you guarantee the LA will pay top up fees.
21/05/2018	Value of site / Alternative in facilities/My figures are different/current occupancy/Current usage to proposed/New model

21/05/2018	Chain capital limit. Self-funding weekly fee will go up. 'Swings and roundabouts'.
21/05/2018	Self-funder have found LA could pay top up fees.
21/05/2018	Carer - One extreme to another. Hope it's not about money. Exercise to tick a box. Concerns about Mums and Dads. 'NPT no council Homes decommissioned'.
21/05/2018	Carer - Are we going to be the same?
21/05/2018	Carer - Why can't you sell off building?
21/05/2018	Carer - Why can't we have discussion around making it financially viable?
21/05/2018	Carer - No money. What happens, limit under Welsh Government. Small number internal majority private sector care.
23/05/2018	Will the buildings be sold if proposals go ahead? - Hollies
23/05/2018	Will the buildings be sold if proposals go ahead? - Rose Cross
23/05/2018	Will the buildings be sold if proposals go ahead? - Parkway
08/05/2018	Top up fees if residents have to move to the independent sector.
08/05/2018	Will the building be knocked down and sold to private developers? Heard it will go to Coastal Housing?
08/05/2018	Concerned that access to new houses (on Olchfa site) is being put above residents.
08/05/2018	There is money wasted, for example, the Kingsway. Couldn't this be used for social care where it is needed? The priorities are wrong.
08/05/2018	Has the cost of the land been considered if Parkway closes?
05/06/2018	It was felt that the Cabinet had not looked hard enough to find savings elsewhere.
21/05/2018	We should not pay top up fees
4.Location	
21/05/2018	Can't understand building is good, contradictory to complex need info.
21/05/2018	Service User - I want to stay here!
21/05/2018	We made a right choice placing here
21/05/2018	What are you doing with building?
21/05/2018	B.M.H no parking, crazy selling this off (Parkway).
21/05/2018	Carer - People here already? If they find a new home, currently looked at Private sector. Could individuals be moved in house? To avoid top up fees? People would be happier to

	be moved in house.					
21/05/2018	Carer - Comparing to BMH Comparative on buildings, they look the same.					
08/05/2018	Don't want to travel halfway across Swansea, Parkway is close to where I live.					
08/05/2018	Why close Parkway when Rose Cross and St Johns are close to each other?					
08/05/2018	We choose council run homes because they are purpose built whereas they are not in the independent sector.					
5. Placement	ts					
21/05/2018	Carer - If respite care - where would you place?					
21/05/2018	Carer - Respite – we were told we have to do it privately.					
05/06/2018	A family member did have concern that if Parkway was kept open how long would this be for and would they be going through the same exercise in 3 years' time?					
05/06/2018	It was recognised by family members that the Council are transparent in the consultat and proposals but felt there was no clear plan going forward and it was about the mor and that it was inevitable that `Parkway would close. It was a done deal and we are or going through the process.					
21/05/2018	Typical exercise nonsense. Mum 97. You have been running this down. Staff are overworked .					
21/05/2018	What's a self-funder					
21/05/2018	Carer - Council funding Commissioned homes are all the homes on this list from Head o Service ?					
21/05/2018	Carer - Older people – if complex we are avoiding too many moves. Anxious, worry and traumatic time. 'Think outside of box'. Accommodate this more, but not new referrals coming in. Council Services are heavily regulated.					
21/05/2018	Carer - Scoring exercise – you have not involved families. Score 6 properties – 1 would to have been included in this piece of work. Massive piece of work? Why you didn't you involve us?					
21/05/2018	Carer/SU - Care home closures came up before to close all homes?					
21/05/2018	Carer - Going on 3 years ago					
23/05/2018	Group queried whether a co-productive approach was being taken –					
23/05/2018	What about the Equality Impact Assessment process?					
08/05/2018	The SSWB Act states people have a choice and this proposal will not give this choice.					
08/05/2018	In regards to the survey, why does if ask for sexual orientation?					
-						

08/05/2018	If NPT and Swansea merge will more homes go?				
6. Staffing					
05/06/2018	Comments were made that the process to close had already started and that staff had been redeployed.				
08/05/2018	What will happen to the staff.				
08/05/2018	Bed blocking shows there is a demand for residential care and not enough beds.				
08/05/2018	How many vacancies are there in the other in-house care homes?				
21/05/2018	Carer - Why aren't you running to full capacity. 10 beds available. CIW – no demand or staffing. There has been no interest in beds.				
7. Vacancies					
05/06/2018	There was concern that if residents had to move, there were not enough vacancies in the Council homes and the private homes were not as a good a standard.				
21/05/2018	Carer - Insufficient beds				
21/05/2018	Carer - Place ad in Evening Post to advertise vacant beds I am sure you will get a take up o beds.				
08/05/2018	The current position is that there are spare beds and this is inefficient.				
08/05/2018	There are not many vacancies in the private sector. I have visited 13 homes and no vacancies and the cost is higher and there are top up fees. Also some homes are for assessment or dementia only.				
08/05/2018	Difficult to book respite provision in the private sector.				
08/05/2018	You are duty bound to find places for people.				
08/05/2018	Places are not advertised and the service is being run down. Tried for respite last year and could not get in. The numbers have reduced from 36 to 26.				
08/05/2018	What if there are no places?				
21/05/2018	Carer - Can't believe this! Could not find respite. Staff have been trained, equipment and facilities.				
8. Wellbeing					
05/06/2018	Family members felt that undertaking a review would cause stress when no decision has been made. A concern was raised that a social worker had told them that if they do not have power of attorney the meeting with their father can be held without them.				
21/05/2018	Complex needs, training, have looked at rooms, bed blocking NHS why not used beds for hospital. My dad 98 hope he dies before move, stressful, wellbeing of SU not being				

	considering
	Carer - Scenario discussed surrounding the ladies Mum's move. She's 96 given up her
21/05/2018	home and has to move again – this is unsettling for her.
	The residents' welfare is not being considered. You would feel the same if it was your
08/05/2018	family.
	If there are no beds or don't want to move to a private home, residents can't be evicted by
08/05/2018	law. If have to move, why not reduce gradually as the most humane way?
21/05/2018	Carer - What will there be for us as we get older?

#### How have you changed your initiative as a result?

The key potential adverse impacts of the proposals on people, carers and staff at Parkway with protected characteristics particularly set out below, alongside appropriate mitigation:

- The wellbeing of older people living at Parkway could be affected if it were to close and they had to move to alternative homes; by way of mitigation the Council will ensure that all residents and their families are properly supported and prepared for any proposed move. This will involve an individual social work assessment to determine their unique needs and determine appropriate move on plans. This assessment will involve family members and all equality matters will be considered as part of this assessment and appropriately mitigated wherever possible.
- There is potential that there could be inadequate choice of alternative care homes for the older people affected if Parkway were to close. At the time of writing the EIA, there were sufficient vacancies within the Council's own homes and the independent sector to accommodate all 17 residents affected. There were a number of homes in the Sketty and surrounding areas with vacancies available and all those affected had been given information on the other homes across the County. From these vacancies, the Council has a duty to ensure that each resident affected has adequate choice at the time of making the decision. The proposal to fund third-party top up fees will enable this choice as well as careful planning and decision making between those residents affected, their families and the social worker supporting them.
- There is a risk that the proposed closure of Parkway could lead to insufficient number of beds in the market to deal with current and future demand for residential care for older people. At any given time, Swansea has an average 8% vacancy rate, which is approximately 125 beds. At the time of writing the report, there were 17 residents at Parkway, with a total of 26 beds. Closing Parkway would lead to a reduction of 9 vacant beds in the market reducing the total number of vacancies to 116. There are therefore sufficient beds to accommodate all residents at Parkway.
- There was a risk that if residents from Parkway had to move, the quality of care for those older people affected could be adversely affected. In the event that Parkway does close, the Council will ensure that each resident is fully supported during any move to ensure that the wellbeing of all those affected is maintained and they all receive good quality care going forward. This will be achieved through a thorough social work assessment with all relevant parties involved, which will clearly outline move on arrangements and ensure there is appropriate support in place before, during and after any move. As currently, there will also be ongoing good contract monitoring of all independent sector homes to ensure any quality issues are identified at the earliest opportunity.
- All of the above had a potential adverse impact on carers due to the overall stress and worry of the situation, and being concerned about their loved ones. However, mitigating as set out above would also mitigate the impact on carers by alleviating some of the stress and worry involved.
- There is clearly also a potential negative impact on those staff affected, but this
  can be mitigated through the Council's redeployment policies, and the Council is
  confident that there are sufficient alternative vacancies elsewhere in Adult
  Services to accommodate them. There were 34 staff potentially at risk. At the time
  of writing this EIA, 3 of these staff had already secured other employment, whilst
  2 were undertaking a trial period in alternative positions. No equalities issues had

been raised through the 1 to 1 meetings with each member of staff that needed to be addressed.

In addition to the above, the Council put a hold on new admissions to Parkway at the beginning of the consultation to minimise the impact on residents affected. This hold would continue should the proposals go ahead.

In general, there was not majority support for the proposal to close Parkway. However, the Council has considered all possible alternative options, but has not been able to identify any financially sustainable alternatives that allow it to ensure certainty of care for reablement, respite and more complex needs whilst overall enabling independence, helping people to remain at home for as long as possible and ensuring the needs to all vulnerable adults are met.

There is clearly a risk if the proposed model is approved, that there could be a negative impact on those individuals currently resident at Parkway due to the need to move. However, this risk can be mitigated as much as possible by ensuring robust social work assessment identifies those move on plans and all those affected are supported before, during and after any move. In addition, there could be a positive impact on the wellbeing of current residents at Parkway as they may build positive relationships as part of any move.

On balance therefore remodelling as per the proposals will allow the Council to effectively meet the requirements of both the Social Services and Wellbeing (Wales) Act and Well Being of Future Generations (Wales) Act by providing a model of care that is sustainable for the future, and effectively meets the needs of an ageing population with more complex needs. The Council is therefore confident that the recommendations put forward are appropriate despite there not being majority support for the proposals.

Overall, there clearly is a risk of a negative impact on residents at Parkway due to the need to move if it were to close, particularly when some residents have lived there a long time and are elderly and frail. However, the above outlines how wherever possible the Council will seek to mitigate those risks and in some cases a move could be positive as they may find they are able to develop new relationships in their new environment which could have a positive impact on their wellbeing. As outlined previously, any move will need to be carefully planned following a thorough social work assessment and each individual supported during and following any actual move.

In light of the above, the proposals have been amended to include provision for payment of third party top up fees as part of the recommendations to Cabinet to mitigate the potential financial impact on residents and their families, as well as their ability to exercise appropriate choice in move on arrangements.

Any actions required (e.g. further engagement activities, mitigation to address any adverse impact, etc.):

A further recommendation will be added to the final proposals put to Cabinet to include provision for payment of third party top up fees.

A communication plan for the ongoing engagement with stakeholders throughout the process will continue – reaffirming the purpose of the model of delivery and latest updates around decisions. This communication plan will form a key part of the overall project plan should the proposals proceed.

Individual social work assessments will need to take place with all those affected at Parkway if the proposals are agreed. This assessment will involve residents, families and a social worker to undertake a thorough assessment of need and agree any move on arrangements. The social workers will then support individuals during and after moves to ensure that their

Ongoing engagement will also be required by staff, in line with the Council's HR processes.

#### Section 5 – Other impacts:

Please consider how the initiative might address the following issues - see the specific Section 5 Guidance

Foster good relations between different groups	Advance equality of opportunity between different groups	
Elimination of discrimination, harassment and victimisation	Reduction of social exclusion and poverty	

#### Please explain any possible impact on each of the above.

The service model for Adult Services aims to impact on all of the above.

In general terms The Social Services and Wellbeing (Wales) Act 2014 provides the legal framework for improving the wellbeing of people who need care and support, carers who need support and for transforming social services in Wales. It reforms social services law, changes the way people's needs are assessed and the way in which services are commissioned and delivered. People with care and support needs will have more of a say in the care and support they receive and there is an emphasis on supporting individuals, families and communities to promote their own health and wellbeing.

The Act introduces common assessment and eligibility arrangements, strengthens collaboration and the integration of services particularly between health and social care, and provides an increased focus on prevention and early help. Local Authorities and health boards have come together in new statutory Regional Partnership Boards to drive integration, innovation and service change.

The Act also promotes the development of a range of help available within the community to reduce the need for formal, planned support. Local Authorities need to work with people to develop solutions to immediate problems and reduce the need for complex assessment and formal provision of care. Where people have complex needs, which require specialist and/or longer term support, local authorities will work with people and their families to ensure that high quality and cost effective services are available at the right time and in the right place.

Local Authorities and their partners need to make sure that people can easily get good quality information, advice and assistance, which supports them to help themselves and make the best use of resources that exist in their communities without the need for statutory support.

Local Authorities also need to ensure a shift from a deficit and dependency model to a model, which promotes wellbeing and independence focused on individual outcomes rather than service targets and objectives.

There will be stronger powers to keep people safe from abuse and neglect.

The Adult services model has interpreted this requirement and embedded into all service development, including the proposed model around Residential Care.

Our vision for health, care and wellbeing in the future is that:

"People in Swansea will have access to modern health and social care services which enable them to lead fulfilled lives with a sense of wellbeing within supportive families and resilient communities. We will help people to keep safe and protected from harm and give opportunities for them to feel empowered to exercise voice, choice and control in all aspects of their lives. Our services will focus on prevention, early intervention and enablement and we will deliver better support for people making best use of the resources available supported by our highly skilled and valued workforce".

Our proposed new model for Residential Care supports this vision and the overarching Swansea Council model for Adult Social Care agreed in 2016.

#### What work have you already done to improve any of the above?

Using this vision as our cornerstone a number of positive steps have been taken to address the 4 priorities listed. These include the development of integrated community Hubs which offer community based services staffed by Social Workers, Nursing staff, Occupational Therapists, Physiotherapists and other community support resources from both the Local Health Board and Local Authority – their purpose is to offer a consistency of approach regardless of the individual's geographical location, staff member providing contact and services which are offered.

It also promotes a service around the individual ensuring that everyone who needs to be involved is available to offer a timely intervention if needed

This model also provides greater consistency in our approach to safeguarding – ensuring that the vulnerable have the most robust processes and professional framework in place to keep them safe from abuse.

It has also enabled us to develop alternative models to traditionally managed care like Residential Care Services – the investment and development of Bonymaen House and Ty Waunarlwydd to focus services on reablement and complex care demonstrated improved outcomes for residents. Equipment, the right facilities and environment combined with the necessary skilled integrated resources (both Swansea Council and Local Health board employees) working together have helped to assist individuals in achieving their personal outcomes

The remodelling of Residential Care Services alongside the other commissioning reviews of services allows us to refocus our limited resources into the most complex of needs and shift investment into the more sustainable and long term investment of building on those assets which already exist within the community.

**Is the initiative likely to impact on Community Cohesion? Please provide details.** The principle of maximising on people's strengths and supporting the identified wellbeing outcome of improved independence and the ability to remain within our own homes and communities for longer will assist with the maximisation of existing schemes and development/potential investment in expansion of these available community based services. This forms part of the wider Prevention Strategy and overall service model for Adult Services in Swansea. It is also a corporate priority across Swansea Council. Community cohesion is consequently impacted on positively by encouraging people to maximise their networks and supports in communities rather than be reliant on statutory support.

How does the initiative support Welsh speakers and encourage use of Welsh? Across all adult services the 'Active offer' is in place - at its heart is the idea that being able to use your own language must be a core component of care – not an optional extra. In an aim to achieve this Adult Services alongside the whole council are working towards mainstreaming welsh language services as an integral part of service planning and delivery. This continues to be a priority regardless of outcomes tied to this proposal.

Actions (to mitigate adverse impact or to address identified gaps in knowledge). Not applicable.

# Section 6 - United Nations Convention on the Rights of the Child (UNCRC):

Many initiatives have an indirect impact on children and you need to consider whether the impact is positive or negative in relation to both children's rights and their best interests. Please read the UNCRC guidance before completing this section.

Will the initiative have any impact (direct or indirect) on children and young people (think about this age group holistically e.g. disabled children, those living in poverty or from BME communities)? If not, please briefly explain your answer here and proceed to Section 7.

### All initiatives must be designed / planned in the best interests of children and young people.

Best interests of the child (Article 3): The best interests of children must be the primary concern in making decisions that may affect them. All adults should do what is best for children. When adults make decisions, they should think about how their decisions will affect children. This particularly applies to budget, policy and law makers.

Please explain how you meet this requirement:

We recognise that we need to ensure that all carers (regardless of age) are supported. For this reason, we have joint commissioning arrangements for Adult Services and Child & Family Services for those which support young carers. This proposal will ensure much needed respite for those carers supporting individuals with complex needs will continue to be provided.

Actions (to mitigate adverse impact or to address identified gaps in knowledge). Impact on this group will continue to be monitored if the proposal is approved. Communication and engagement with alternative provisions for non-complex clients will be managed as part of transition if the proposal is approved.

#### Section 7 - Monitoring arrangements:

Please explain the monitoring arrangements for this initiative:

#### Monitoring arrangements:

EIAs to be continually updated in line with decision making and further consultation

Corporate communications team and Access to Services team will continue to be engaged in process with key updates provided as and when possible

Social work assessments for residents at Parkway to manage impact of change (if approved)

Ongoing project monitoring of overarching project plan to ensure project is delivered in line with objective and any adverse impacts are mitigated.

Implementation of model and affected processes to be mapped and planned appropriately (if approved)

Actions: Ongoing update of EIA.

(Dependent on decision) commencement of social work assessments for those residents directly affected at Parkway.

(Dependent on decision) finalisation of revised project plan.

(Dependent on decision) implementation of proposed model and associated home closure.

(Dependent on decision) monitoring of outcomes and impact on non-eligible clients to be developed and produced.

#### Section 8 – Outcomes:

Having completed sections 1-5, please indicate which of the outcomes listed below applies to your initiative (refer to the guidance for further information on this section) Outcome 1: Continue the initiative – no concern Outcome 2: Adjust the initiative - low level of concern Outcome 3: Justify the initiative - moderate level of concern Outcome 4: Stop and refer the initiative – high level of concern.

imes

For outcome 3, please provide the justification below:

For outcome 4, detail the next steps / areas of concern below and refer to your Head of Service / Director for further advice:

In Section 4 of this EIA, we have set out the mitigation that has been put in place to address the negative impact on the current residents in Parkway within the various protected groups.

It is imperative that all residents and their carers and fully supported by social workers and Swansea Council staff before, during and after any move.

Making this change is necessary to ensure that Swansea Council can meet the current and future care needs of all Swansea residents eligible for support sustainably and effectively in the future.

#### Section 9 - Publication arrangements:

On completion, please follow this 3-step procedure:

- 1. Send this EIA report and action plan to the Access to Services Team for feedback and approval – accesstoservices@swansea.gov.uk
- 2. Make any necessary amendments/additions.
- 3. Provide the final version of this report to the team for publication, including email approval of the EIA from your Head of Service. The EIA will be published on the Council's website - this is a legal requirement.

#### **EIA Action Plan:**

Objective - What are we going to do and why?	Who will be responsible for seeing it is done?	When will it be done by?	Outcome - How will we know we have achieved our objective?	Progress
Inform Parkway Residents and their families, and staff of outcome of Cabinet Decision	Head of Service	Post Cabinet on 20/09/18	Letters issued	
Revise overall project plan (if approved)	Project Management Support	Post Cabinet on 20/09/18	Project plan completed	
Commencement of Social Work Assessments to manage impact of change (if approved)	Principal Officer for Service Provision	Post Cabinet on 20/09/18	Monitoring that all assessments are taken	
Support before, during and after moves from Parkway (if approved)	Allocated Social Workers	Post Cabinet on 20/09/18	Ongoing monitoring by social workers	
Commencement of formal staff processes	Principal Officer for Service Provision	Post Cabinet on 20/09/18	All staff found alternative employment/left the organisation	
Closure of Parkway (if approved)	Head of Service	Early 2019	Parkway closes	
Ongoing revision to EIA	Project Management Support	Ongoing	Evidence of EIA being updated.	

\* Please remember to be 'SMART' when completing your action plan (Specific, Measurable, Attainable, Relevant, Timely)