

Appendix B

Integrated Impact Assessment (IIA) Report

This form should be completed when a screening form has indicated a full Integrated Impact Assessment is required and found to be relevant to Equality Act 2010, Socio-economic Duty and Well-being of Future Generations (Wales) Act 2015

Please refer to the 'IIA Report Form Guidance' while completing this form. If you need further support, please contact accesstoservices@swansea.gov.uk.

Which service area and directorate are you from?

Service Area: Adult Services

Directorate: Social Services

Q1(a) What are you assessing?

- New and revised policies, practices or procedures
- Service review, re-organisation or service changes/reductions, which affect the wider community, service users and/or staff
- Efficiency or saving proposals
- Setting budget allocations for new financial year and strategic financial planning
- New project proposals affecting staff, communities or accessibility to the built environment, e.g., new construction work or adaptations to existing buildings, moving to on-line services, changing location
- Large Scale Public Events
- Local implementation of National Strategy/Plans/Legislation
- Strategic directive and intent, including those developed at Regional Partnership Boards and Public Services Boards which impact on a public bodies functions
- Medium to long term plans (for example, corporate plans, development plans, service delivery and improvement plans)
- Setting objectives (for example, well-being objectives, equality objectives, Welsh language strategy)
- Major procurement and commissioning decisions
- Decisions that affect the ability (including external partners) to offer Welsh language opportunities and services
- Other

(b) Please name and fully describe initiative here:

All local authorities are facing intense financial pressures, and are looking at ways to make sure that every pound of funding is spent wisely and effectively. This means that we need to look at how we are organised, how we resource and provide services to continue to ensure that we provide the highest quality of services possible to meet the care and support needs of our most vulnerable citizens.

We do need to consider how we can make sure that this is done in a sustainable way; how we can meet the social care needs of local people, now and in the future. Charging for social care is a statutory expectation, as part of a sustainable model of social care. All social services residential and non -residential charges are set within a national legislative framework, and in compliance to regulations and code of practice as set by Welsh Governments, namely within Parts 4 and 5 of the Social Services and Well-being (Wales) Act 2014, henceforth 'the Act'.

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Under the Act, citizens to whom the charges apply are protected by some important policy entitlements:

- right to be offered a financial assessment to consider whether they have the means to pay a contribution to the costs of their social care and support
- there are clear principles that a person's ability to pay should not precluding access to care and support or that the charges for care and support should not exceed the costs of provision – there are personal thresholds set by the Welsh Government: namely a maximum weekly charge to be set at £100 per week (2021/22)

This Full IIA report covers both the Annual Review of Charges (Social Services) report, which sets out any changes within Swansea Council's Charging Policy (Social Services), and the proposed List of Charges to be applied in 2022/23.

The main change to take effect from 1st April 2023 is that all social services charges are to be increased in line with current inflation and forecasts; this represents an **uplift of 10%**. There are no new charges proposed by this annual review. Clearly though, there are some impacts arising from applying a high inflationary uplift within the Council's charges (on social care) and this report considers the available evidence carefully.

For these charges will be increased by 10%, which will raise the hourly rate for adult social care services in line with current inflation:

For example, Dom Care is currently £19.88 per hour, with the change it would increase to £21.87.

Older Person's Day service is £46.20 per day, it would increase to £50.82.

But the maximum weekly charging and means testing through a financial assessment will still apply as per the current Council policy.

Any individual's charges will still be financially assessed, so based on their own unique circumstances and current income and for non-residential this would be up to the maximum weekly limit set by Welsh Government (currently £100 p/week).

Each service fee is in the charging policy's list of charges to be made available on the Council's public website, if the increase is agreed upon.

Will this initiative result in any changes needed to the external or internal website?

Yes No **If yes, please provide details below**

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(d) It was initially screened for relevance on: 18/01/2023

Lead Officer

Name: Simon Jones

Job title: Strategic Performance & Improvement Officer

Date: 1st February 2023

€Approved by Head of Service

Name: David Howes

Job title: Director of Social Services

Date: 6th February 2023

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Section 1 – Aims

What are the aims of the initiative?

Social Services and Well-being (Wales) Act 2014 (The Act) came into effect in April 2016 setting out the statutory requirements placed on each Local Authority, to publish their discretionary charges for social services.

In working a sustainable approach to social care, Welsh Local Authorities have some discretion in how charges for residential and non-residential and community-based social services can be applied.

Under the Social Services and Well-being (Wales) Act 2014, a local authority can only charge:

- up to the cost of providing the social care service;
- what the person can afford to pay for an assessed for service.

Swansea Council's Charging (social services) policy sets out the arrangements for charging citizens for costs incurred when providing care and support services.

The List of Charges, appended to the policy, details what services are chargeable and the level of charge for the year ahead.

Swansea Council carries out a 'best practice' approach to social services charging by carrying out an annual review of the charges and how they are applied each year.

This Full IIA related to the sixth annual review of social services charging was carried out on behalf of the Social Services Finance and Charging group, chaired by the Director of Social Services, and the recommendations made as part of this review.

Specifically, this Full IIA report concerns non-residential service users of social care services in Swansea, and the review's recommendation relating to **proposed inflationary uplift to all social services charges of 10%**.

Who has responsibility?

Director of Social Services
Cabinet Member- Care Services
Head of Adult Services

Adults Services are responsible for the provision of services to the most vulnerable adults in Swansea.

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Adult Services vision

“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”

Who are the other stakeholders?

- Non-residential service users of social care services (Young people / adults)
- Unpaid carers
- Providers of community-based adult social care services (in-house/ external) including home care, day services, respite care, community alarms
- Staff from partnership organisations/ bodies locally and regionally (Health)

Within Swansea Council:

- Social Services Finance & Charging group
- Safeguarding People and Tackling Poverty Corporate Delivery Committee
- Cabinet/ Corporate Management Team

Other stakeholder groups who may need future consideration:

- Advocates
- Swansea Poverty Truth Commission
- Third sector representatives
- Benefits advice and welfare right groups/organisations
- Disability groups

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Section 2 - Information about Service Users (See guidance)

In order to complete this section you will need to look to data such as Census data, research and performance management information, surveys, future trends, service user data, socio-economic data from recent consultations, engagement and research

Children/young people (0-18)	<input type="checkbox"/>	Sexual orientation.....	<input type="checkbox"/>
Older people (50+).....	<input checked="" type="checkbox"/>	Gender reassignment.....	<input type="checkbox"/>
Any other age group	<input checked="" type="checkbox"/>	Welsh language.....	<input type="checkbox"/>
Future generations (yet to be born)	<input checked="" type="checkbox"/>	Poverty/social exclusion	<input checked="" type="checkbox"/>
Disability	<input checked="" type="checkbox"/>	Carers (including young carers).....	<input checked="" type="checkbox"/>
Race (including refugees).....	<input type="checkbox"/>	Community cohesion.....	<input type="checkbox"/>
Asylum seekers	<input type="checkbox"/>	Marriage & civil partnership	<input type="checkbox"/>
Gypsies & Travellers.....	<input type="checkbox"/>	Pregnancy and maternity.....	<input type="checkbox"/>
Religion or (non-)belief	<input type="checkbox"/>		
Sex	<input type="checkbox"/>		

Please provide details of the information you hold in relation to the groups above:

a) General Population

Swansea has the second largest local authority population in Wales and accounts for almost 8% of its total population (3,169,600). Between the last two censuses (held in 2011 and 2021), the population of Swansea fell by 0.2%, from around 239,000 in 2011 to around 238,500 in 2021. This means Swansea was one of seven local authority areas in Wales to see its population decline.

b) Demographic changes

Swansea has a population of 140,000 people aged 50 and over. The number of people aged 65 to 74 years rose by just under 3,700 (an increase of 16.6%) between 2011 and 2021. The percentage of Welsh speakers in Swansea remained at 11.2% in 2021.

c) Race

In 2021, 10,451 (4.4%) of Swansea residents identified their ethnic group within the "Asian, Asian British or Asian Welsh" category, up from 7,803 (3.3%) in 2011. The 1.1 %-point change was the largest increase among high-level ethnic groups in this area.

The percentage of people who identified their ethnic group within the "Other" category ("Arab" or "Any other ethnic group") increased from 2,380 (1.0%) in 2011 to 3,383 (1.4%) in 2021.

In 2021, 218,052 (91.4%) of people in Swansea identified their ethnic group within the "White" category (compared with 224,697 (94.0%) in 2011), while 1.6% identified their ethnic group within the "Mixed or Multiple" category (compared with 0.9% the previous decade).

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d) Informal Care

In 2021, 5.0% of Swansea residents (aged five years and over) reported providing up to 19 hours of unpaid care each week. This figure decreased from 7.9% in 2011. In 2021, just under 1 in 40 people (2.3%) reported providing between 20 and 49 hours of unpaid care each week, compared with 2.1% in 2011. The proportion of Swansea residents (aged five years and over) that provided at least 50 hours of weekly unpaid care decreased from 4.0% to 3.8%. These figures suggest that individuals and families' capacity to provide informal care is increasingly under pressure. These pressures within families and communities are only likely to increase due to the cost of living crisis. Swansea's Adult Services are offering more carers assessments to support the wellbeing of carers in their own right.

e) Poverty

Health and social care, and various other public services play vital roles in supporting people to avoid or overcome poverty and its effects. It is therefore important to ensure that those at greatest risk of poverty and deprivation are able to access them, and any barriers to doing so are addressed. Various data sources referring to various indicators inform us about the current situation, and numerous plans exist at different levels which our strategies will require us to connect with in our work to tackle poverty locally.

The Welsh Index of Multiple Deprivation (WIMD) offers some indicator data which is useful for understanding our current position. WIMD is calculated for all small areas (Lower layer Super Output Areas - LSOAs) in Wales.

Following the 2011 Census, 1,909 LSOAs were defined in Wales (148 in Swansea) and they have an average population of 1,600 people.

This index was last updated in 2019, using data which in some cases was then three years old.

In WIMD 2019, 17 (11.5%) of Swansea's 148 LSOAs are in the most deprived 10 per cent in Wales (similar to the overall proportion in 2014).

The Swansea Economic Profile, last updated in February 2016 contains some data relevant for discussing poverty.

The Swansea Poverty Profile completed in April 2014 further examines the local situation, comparing it with other local authorities, with Wales and UK averages and with different points in time.

The 2021 Census published to date also contains some valuable information about household composition and economic activity.

f) Demand for social Care

Swansea PSB's Local Wellbeing Assessment (2022) reports that generally the demand for Adult Social Care in Swansea is increasing, though the resources available to meet the demand have been under constant pressure.

The main reasons for the increasing or changing demand include:

- Increasing numbers of people as more people live longer,
- Increasing levels of need from people with complex / chronic conditions
- Increasing expectations from people that their needs can be met, particularly by health and social care services
- Immediacy of needs – people have expectations for faster response times
- Carers have their own wellbeing needs and lives

Of the 200,000 (approx.) adults aged 18 and over living in Swansea, the number who received care and support from Swansea Council's Adult Services during the last 3 years were:

- 2020/21 = **6,951**

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- 2019/20 = 6,463
- 2018/19 = 6,434

g) Charging for social services

It is challenging to report accurately on the number of adults in Swansea who are subject to charging for their social care at a point of time or invoices during a period, as their individual circumstances may change.

The figures on the number of financial assessments carried out show the high number of people in a year who may be subject to charging. In 2021/22, the SCIF team carried out **5,011** financial assessments of social care clients (6,830 financial assessments were undertaken in 2020/21).

Of this number, there were:

- 1,625 assessments of new clients (2,477)
- 3,386 reviews of existing clients (4,353)

h) Charges for non-residential adult social care

It is challenging to undertake analysis of the number of people who are subject to the maximum weekly charge during the financial year, as people's financial circumstances may change, their care and support package may change, and a sample week is a good indication of impact.

During a sample week (week ending 04/12/22) there were **1085 clients** who have to pay for Council's adult services (non-residential). Out of this group of 1085, **261 clients** were not invoiced for the maximum assessed charge in this sample week (week ending 04/12/22).

Taken from this data, around **25%** of clients who are charged are falling below the weekly charges threshold, that is actually paying less than £100 per week (threshold set by Welsh Government).

It should be noted that Swansea Council only invoices clients for actual services (hours of care) received.

During any period, clients may, based on the actual care they receive, move in and out of the threshold, that is some weeks their care may receive less than the maximum, and other weeks they receive more care to trigger the threshold.

Another caveat is that the Welsh Government has yet to announce the national social services charging allowances and thresholds for 2023/34. If they increase the maximum weekly charge for example, this could significantly alter the number of people who will be paying more, but these people won't necessarily be affected by the inflationary uplift. Proposal as the cost of their cap would remain capped at £100 per week.

It should be noted of the 261 clients, some would have been assessed as needing a package of care which is expected to be at, or over, the maximum weekly charge level. Our analysis of the sample week also noted that of **21 people** have a max charge of £100 but receive actual services totalling 1 hour a week or less, so were invoiced for £19.88 (the current hourly rate).

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Our analysis also showed that within the group of 261 clients, there is a range in relation to what charged and the maximum weekly charge (currently £100). The lowest difference was £0.60p between what they were invoiced for and the threshold charge, whilst the greatest difference was £80.12, that is those people charged only for an hour of adult social care. This group would be impacted by approx. £2 per hour care received, the proposed uplift on the current hourly rate (£19.88).

Of the 262 clients, % by client group

Client Group	% of Client Group
OLDER ADULTS	67.83%
LEARNING DISABILITY	17.88%
YOUNGER ADULTS	12.53%
MENTAL HEALTH	1.75%
Total	100.00%

Main References.

ONS (2022) How life has changed in Swansea (Jan 2023): <https://www.ons.gov.uk/visualisations/censusareachanges/W06000011/>

ONS Provision of unpaid care (Jan. 2023): <https://www.ons.gov.uk/datasets/TS039/editions/2021/versions/2>

Welsh Index of Multiple Deprivation (WIMD) analysis of 2017-2019 deprivation: <https://www.gov.wales/analysis-protected-characteristics-area-deprivation-2017-2019>

WIMD – Swansea: <https://www.swansea.gov.uk/wimd2019>

Swansea Public Services Board (May 2022) Assessment of Local Wellbeing 2022: <https://www.swansea.gov.uk/psbassessment2022>

Swansea Council Tackling Poverty Strategy: <https://www.swansea.gov.uk/article/9610/Tackling-Poverty-Strategy>

Swansea Council Prevention Strategy: <https://staffnet.swansea.gov.uk/tacklingpovertystrategy>

See also Swansea Council’s Annual Review of Social Services Charging 2022/23 (Main report)

Swansea Council’s Charging (social services) policy: <https://staffnet.swansea.gov.uk/socialserviceschargingpolicy>

Under this proposal, the Council would still be working within national guidance which sets out what allowances have to be made and how charges are capped (maximum weekly charge).

It is the Council’s responsibility to implement their own Charging Policy, that fairly takes into account additional costs which a service user may incur as a result of living with a disability or long term health condition.

No changes have been made within these discretionary areas, though there are plans, within Adult Services, to finalise and publish further financial assessment guidance.

The Council would also, as now, continue to support service users to maximise their benefits, including housing benefit and council tax discount, as part of case management and through the financial assessment process.

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Any actions required, e.g. to fill information gaps (write below and add to action plan)?

- Finalise and publish financial assessment guidance
- Implement Swansea Council Tackling Poverty strategy
- Implement Swansea Council Prevention strategy
- Finalise Council Debt strategy (work in draft) – work as part of the work programme of the Safeguarding People and Tackling Poverty Corporate Delivery Committee

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Section 3 – Assessing the Impact (See guidance)

Please consider the possible impact on the different protected characteristics and statutory considerations:

	Potential Impacts	Positive / Negative/Neutral Impact/Needs further investigation	Prompts (not an exhaustive list) Consider:
Race	The proposed uplift to charges and Swansea Council’s charging policy will be applied within principles of equality, transparency and fairness to all service users who receive care and support from the Council and who are expected to pay for services, regardless of racial group. The uplift to actual charges could deter some people from accepting care and support, and this could impact differently within particular minority ethnic communities.	Needs further investigation	Ethnicity Nationality Gypsies / Travellers Language: interpreter provision Refugee / Asylum Seekers Migrants Awareness events United Nations Convention on the Elimination of All Forms of Racial Discrimination (UNCERD)
Disability	The proposed uplift to charges and Swansea Council’s charging policy will be applied within principles of equality, transparency and fairness to all service users who receive care and support from the Council and who are expected to pay for services, regardless of disabilities. Our initial analysis shows that some younger adults and people with a learning disability could be impacted depending upon their assessed package of care, whether their chargeable hours of care are under the maximum weekly threshold. Some people with disabilities who receive care packages from the Council may find they are charged or charged more for the same service.	Negative	Mobility / Dexterity Blind or Visually impaired Deaf or Hearing impaired Mental Health Learning Disabilities Dementia Neurological difference / Autism Access to buildings/ facilities Access to communication methods Dietary requirements Other Long Term Health Conditions United Nations Convention on the Rights of Persons with Disabilities (UNCRPD)

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	Potential Impacts	Positive / Negative/Neutral Impact/Needs further investigation	Prompts (not an exhaustive list) Consider:
Carers	The proposed uplift to charges, and charges are applied to the individual receiving social care. There may be, in some cases, a wider social-economic impact on carers and families. It is worth noting that Swansea Council offers carers an assessment of their own wellbeing needs. Also, that supports services available to carers are not subject to charging.	Neutral	Providing unpaid and informal care A child caring for a disabled parent An older person caring for a friend who has a mental health issue A young adult caring for a sibling with substance misuse difficulties An adult caring for an older relative who is elderly, frail or experiencing dementia
Sex	The proposed uplift to charges and Swansea Council's Charging (social services) policy will apply equally to all service users who receive support from the Council regardless of gender. However, as women are generally more highly represented amongst users of adult social care, and as carers and have lower income, any uplift to charges could have a disproportionate impact on a small number of women whose care received remains under the maximum weekly threshold.	Negative	Men / Women Gender Identity Childcare Gender Pay Gap Domestic abuse United Nations Convention on the Elimination of All Forms of Discrimination against Women (UNCEDAW)

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	Potential Impacts	Positive / Negative/Neutral Impact/Needs further investigation	Prompts (not an exhaustive list) Consider:
Age	<p>The proposed uplift to charges, and Swansea Council's charging policy will be apply within the principles of equality, transparency and fairness to all service users who receive care and support from the Council and who are expected to pay for services, regardless of age.</p> <p>Some older adults who receive care packages from the Council may find they are charged or charged more for the same service</p>	Negative	<p>Older People including citizens with dementia. Could the initiative contribute to the 'age friendly' agenda or improve the experience of getting older in Swansea</p> <p>Children, Young People</p> <p>Cross-generational working offers a wide variety of benefits</p> <p>Working Age People, Young Families</p> <p>Demographics</p> <p>NB: Where children / young people are affected complete the Childrens Rights Checklist United Nations Convention on the Rights of the Child (UNCRC)</p> <p>Caring responsibilities</p>
Future generations (yet to be born)	<p>The proposed uplift to charges and Swansea Council's Charging (social services) policy will apply equally to all service users within the statutory guidance set by Welsh Government as outlined. Council discretion is applied only within the limits set by Welsh Government, and as part of a sustainable model of health and social care.</p>	Neutral	<p>We must ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs</p>
Religion & Belief	<p>The proposed uplift to charges and Swansea Council's Charging (social services) policy will apply equally to all service users who receive support from the Council regardless of religion or belief.</p>	Neutral	<p>Faith Communities</p> <p>Non Beliefs</p> <p>Dietary requirements</p> <p>Vegetarianism/Veganism</p> <p>Other philosophical beliefs</p> <p>Dress code/uniforms</p> <p>Religious festivals/activities, agile working</p>

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	Potential Impacts	Positive / Negative/Neutral Impact/Needs further investigation	Prompts (not an exhaustive list) Consider:
Sexual Orientation	The proposed uplift to charges and Swansea Council's Charging (social services) policy will apply equally to all service users who receive support from the Council regardless of sexual orientation.	Neutral	Gay Lesbian Bi-sexual Heterosexual Terminology Confidentiality about sexuality https://www.stonewall.org.uk/
Gender Reassignment	The proposed uplift to charges and Swansea Council's Charging (social services) policy will apply equally to all service users who receive support from the Council regardless of gender / status.	Neutral	A person who proposes to, starts or has changed their gender identity Transgender Appropriate language use, ie, appropriate pronouns
Marriage & Civil Partnership	The proposed uplift to charges and Swansea Council's Charging (social services) policy will apply equally to all service users who receive support from the Council regardless of marital status	Neutral	Marital status Civil Partnership status
Pregnancy & Maternity	The proposed uplift to charges and Swansea Council's Charging (social services) policy will apply equally to all service users who receive support from the Council regardless of whether pregnancy or maternity is a factor. The charges do not apply to children or dependent	Neutral	Pregnant mothers Those entitled to maternity and paternity leave Foster/Adoption Breastfeeding mothers

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	<p align="center">Potential Impacts</p>	<p align="center">Positive / Negative/Neutral Impact/Needs further investigation</p>	<p align="center">Prompts <small>(not an exhaustive list)</small> Consider:</p>
<p>Welsh Language</p>	<p>The proposed uplift to charges and Swansea Council's Charging (social services) policy will apply equally to all service users who receive support from the Council regardless of whether services are provided through the medium of Welsh language.</p>	<p>Neutral</p>	<p>Ensuring equal status of both Welsh and English languages. Availability of and access to services, activities and information. Rights of individuals to ask for WL services. Impact on Welsh speaking communities, including: Positive / negative effects on opportunities to use the WL. Possible changes to number/percentage of Welsh speakers Job opportunities / Staffing changes. Training needs and opportunities Availability of Welsh medium education</p>

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	Potential Impacts	Positive / Negative/Neutral Impact/Needs further investigation	Prompts (not an exhaustive list) Consider:
Socio Economic Considerations	<p>Income generation can reduce the costs of services to Council taxpayers or to provide care and support to more people in need. Overall, this work contributes towards Swansea Council's Corporate Plan strategic objective to safeguard our most vulnerable citizens. The social care market, as all households and businesses, has been seriously impacted by UK inflation on real wages, energy and fuel costs, and price increases.</p> <p>To ensure that people who are living in less favourable social and economic circumstance , means testing protects this group from increases. Based on a weekly sample, this applied to 75%. However, we estimate 25% of people (based on a sample week) charged for non-residential adult social care services, fall below the threshold for the maximum weekly charge (currently set by Welsh Government at £100, but this may be subject to increase in 2023/24).</p>	Negative	<p>People living in less favourable social and economic circumstances than others in the same society. Disadvantage may be exacerbated by many factors of daily life, not just urban or rural boundaries. The impact on limited incomes are significant but also consideration needs to be given to service accessibility and barriers to participation.</p> <p>'Intersectionality' issues - where identity compounds socio-economic status, e.g., single parents (often women), disabled people, some BAME groups.</p>
Human Rights	<p>The proposed uplift to charges and Swansea Council's Charging (social services) policy will apply equally to all citizens and service users who receive support from the Council.</p>	Neutral	See Human Rights Articles .

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	Potential Impacts	Positive / Negative/Neutral Impact/Needs further investigation	Prompts (not an exhaustive list) Consider:
Intersectionality	The wider cost-of-living crisis and inflationary pressures are having a disproportionate impact on those people in receipt of social care their carers and families. We do have to consider how poverty can impact on the wellbeing and care and support needs of the most vulnerable citizens. Swansea Council is working on a corporate debt recovery policy to ensure that a fair and compassionate approach is taken when working with individuals and families who are in arrears through charges.	Negative	The way in which power structures based on factors such as gender, race, sexuality, disability etc. interact with each other and create inequalities, discrimination and oppression. (the multiple layers of discrimination)
Community Cohesion	The wider cost-of-living crisis and inflationary pressures are having a disproportionate impact on those people in receipt of social care their carers and families. We do have to consider how poverty can impact on families and the community resilience. Swansea Council provides a range of services to support families and communities and to help manage the wider impacts	Negative	Think about relationship between people from different backgrounds, community tensions, community facilities http://gov.wales/topics/people-and-communities/communities/communitycohesion/?lang=en
Other (please state)	Set alongside this demand for and charging for care and support within the pandemic; how a context of growing demand and rising costs within social care is impacting on the levels of income generated in the period.	Neutral	Eg, Modern Slavery, Safeguarding, Other Covid effects, Ex-offenders, Veterans, Care Leavers, Substance Abuse, Homeless

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Human Rights Act 1998 <ul style="list-style-type: none">• Article 2 Right to life• Article 3 Freedom from torture and inhuman or degrading treatment• Article 4 Freedom from Slavery and forced labour• Article 5 Right to liberty and security• Article 6 Right to a fair trial• Article 7 No punishment without law• Article 8 Respect for private life, family, home and correspondence• Article 9 Freedom of thought, belief and religion	<ul style="list-style-type: none">• Article 10 Freedom of expression• Article 11 Freedom of Assembly and association• Article 12 Right to marry and start a family• Article 13 Right to access effective remedy if rights are violated• Article 14 Protection from discrimination• Protocol 1, Article 1: Right to a peaceful enjoyment of your property• Protocol 1, Article 2: Right to education• Protocol 1, Article 3: Right to participate in free elections• Protocol 13, Article 1: Abolition of the death penalty
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If you have identified any areas which need further investigation, these will need to be added to your action plan

At present we estimate that roughly 25% of people (based on a sample week) are charged for non-residential adult social care services, and fall below the threshold for the maximum weekly charge (currently set by Welsh Government at £100, but this may be subject to increase in 2023/24).

We need to routinely monitor the number of clients within this cohort, and to profile against local population data and type of service received, as well as protected characteristics, such as race, gender.

Swansea Council continues to undertake an annual review of social services charges, as set out under Part 5 of the Social Services and Well-being (Wales) Act

Our review process will continue to develop and improve its methodology to take into account the following areas:

- Statutory considerations- any changes to national policy
- How Current charging policy is working in practice
- Improvements made this year. Changes planned
- Opportunities for any new charges
- What people are telling us
- How Swansea's list of charges compares to other Welsh Local Authorities
- Integrated Impact assessment

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Section 4 - Involvement

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

Swansea Council carried out a public consultation of the budget proposals for 2023/24 in January 2023:

[Council Budget Consultation - Staff portal \(swansea.gov.uk\)](https://www.swansea.gov.uk/council-budget-consultation-staff-portal)

Among those seeking a public response is the following **Proposal**:

This proposed principle to increase charges in line with increased inflation costs or to ensure we recover all cost of providing our services would also apply to charges to Social Care Services. Our Social Services Charging Policy has been produced in accordance with the legal requirements set out in The Social Services and Well-being (Wales) Act 2014 ("the Act") and sets out Swansea Council's position on charging for social care. It is proposed that where services are currently charged, these charges will be increased by only 10%. Maximum charging and means testing will still apply as per the current policy. Details of the policy and list of charges current applied can be found here.

If you need any further information in relation to the proposed increase in charges for social care please contact us on the details below:

Email: SWInbox@swansea.gov.uk

Tel: 01792 636322

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

As part of the wider budget consultation, we set up a specific helpline and telephone number which operated Monday to Friday 9 – 5 throughout January 2023 and a generic inbox for queries 01792 636322 & email : SWInbox@swansea.gov.uk

We also contacted all clients who would be impacted by the proposed 10% increase via letter, a total of 5829 letters were sent, 2480 to those who have a lifeline and 2359 who receive a service provision and offered them the opportunity to input into the general budget survey or contact us via phone or email.

What did your involvement activities tell you? What feedback have you received?

In response to letter sent to all services users subject to charging (Adult Services) - we received a total of 149 calls and 11 email inquiries. Feedback specifically about the budget consultation was fed directly into the main budget survey. We had some general queries too which were able to be answered via the helpline. All staff and managers provided with a briefing note including consultation, what it meant, and how to help clients take part. This was also provided to front doors and Corporate Complaints team. Weekly mentions in the social services directors briefing to all staff (including wider Child and Family and Commissioning Staff) and links to the survey. Response to one media enquiry on the budget generally. Corporate communications promoted the overall budget consultation – with item on Staffnet (January 2022); Press Release and public website story January 2022

In response to Council's public consultation on proposed budget 2023-24, we received a total of 440 responses.

In respect of the above proposal:

Do you currently pay for Social Care Services?

28 (6.6%) Yes

397 (93.4%) No

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Would you prefer to pay more for those services rather than see a reduced level of service?

185 (54.4%) Yes
155 (45.6%) No

Are there any comments you would like to make about how this will affect you?

86 (100.0%)

A thematic analysis of the 86 comments is shown in the following table, with some consideration:

Theme	Count	Consideration
Ability to pay	21	Main concern, though currently addressed by financial assessment offer and nationally set, weekly charge thresholds
Unfairness of national system	20	Out of scope of this review.
Efficiency	15	Some comments question the value for money in terms of service received e.g. home care
Support for 10% uplift	9	Some people supporting proposal, but mindful of the ability to pay of some, vulnerable people
Council strategy	6	Some challenge to Corporate priorities, though safeguarding vulnerable people remains a corporate priority
Challenge 10% uplift	5	Some questioning whether a blanket approach to all services is fair and whether 10% is a fair reflection of inflation against benefit increases
Other	4	Should there be a regional approach to social care/ social care charging?
Not a service user	3	-
No comment	3	-
Grand Total	86	

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How have you changed your initiative as a result?

No, whilst it is acknowledged that a number of respondents are not in favour of the proposed uplift, and that many have commented on the proposals, the uplift to charges is still seen, by the majority (**54%**) of respondents, as an important determinant of a sustainable future model of social care, one that reflects the value and costs of social care, and a sustainable future model to ensure services for the most vulnerable in the community, it is considered, on balance, that it is appropriate to recommend that the proposal be adopted and to work with those people affected by the proposal to support them to manage the impact.

Many of the respondents comment on how overall health and social care system, the national charging framework and how the Council is working for individual citizens and society in general. Most of comments concern whether those most vulnerable people have the ability to pay any increased charges, when they are more likely to be receiving welfare benefits.

Any actions required (e.g. further engagement activities, mitigation to address any adverse impact, etc.)? (Add to action plan)

No, following the consultation, there are no identified changes to the initial proposal and all mitigation actions identified above remain in place. In addition, people who need/request additional support to understand and adapt to any changes would be able, in the first instance, to make a request for an updated Financial Assessment from the Councils Social Care Income and Finance (SCIF) Team. The Councils Financial Assessment Officers are experienced in understanding an individual's unique circumstances, to apply the agreed allowances, assessing disability related expenditure and supporting with accessing benefits advice. In certain circumstances, where someone needed more help to understand the changes, the Financial Assessment Officers can work with social workers and welfare rights officers to help maximise a client's benefits.

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Section 5 – Duties (please see guidance)

Please consider how the initiative might address the following issues. How will the initiative impact on the duties set out below? Think about what work you have already done to improve the outcomes.

Public Sector Duty – how will the initiative address the below?	
Foster good relations between different groups	By working in partnership, promoting accessible services, sound professional practice through collaborative communication and the safe and secure sharing of information, we can continue to have our eyes and ears open to the experiences of those either using or working in the social care sector.
Elimination of discrimination, harassment and victimisation	In Swansea, our corporate priority is safeguarding our most vulnerable people and building resilient communities. The Council is concerned about the human rights of each and every citizen, and the need to safeguard and protect the rights of people in need of health and social, care and support. Swansea promotes safeguarding as “everyone’s business”, seeking out occurrences of abuse or neglect of vulnerable adults, and children at risk are noticed at an early stage- accessing our early intervention and preventative approaches.
Advance equality of opportunity between different groups	By working collaboratively, we can continue to improve our service offers and pathways for citizens to ensure all individuals in need of social care can give timely and proportionate responses, and support to access the help they may need through ‘What Matters’ conversations that are concerned with their unique circumstances, and the outcome they hope to achieve. Also, applying a set of clear values and principles across all social services. Adult Services’ mission statement is: <ul style="list-style-type: none"> – We will help people to keep safe and protected from harm and give opportunities 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
Socio-economic Duty - Describe any issues identified as a result of the initiative for those people experiencing and living in poverty	
a) Communities of place	Whilst the overall aim of the duty is to deliver better outcomes for those who experience socio-economic disadvantage, Swansea Council is implementing the national social services charging framework and responding to the unprecedented cost of living crisis. Our statutory duty remains to safeguard the most vulnerable people in our communities, and to ensure that care and support is available to people in need.

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b) Communities of interest	The Council recognises the impact that poverty has on individuals and families and provides a range of Tackling Poverty and Prevention services, closely aligned to social services so that they can be targeted to those groups where there is clear evidence of disadvantage, and eligible need.
How does your proposal ensure that you are working in line with the requirements of the Welsh Language Standards (Welsh Language Measure (Wales) 2011)? (beyond providing services bilingually)	
a) To ensure the Welsh language is not treated less favourably than the English language	Swansea Council Social Services is delivered in line with the Welsh Language standards, and working towards the objectives set by the Mwy Na Geiriau framework for Health and Social Care, in particularly promoting the active offer, continuously improving the quality of our services and through a Workforce development strategy
b) That every opportunity is taken to promote the Welsh language	As above
c) Increase opportunities to use and learn the language in the community	As above
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	
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)?	
It is not anticipated that there will be an impact on children and young people, their wellbeing, their life opportunities or outcomes.	
All initiatives must be designed / planned in the best interests of children and young people. <i>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.</i> Please explain how you meet this requirement:	
This proposal affects clients within Adult Services in receipt of community-based services. Swansea Council supports the Welsh Government's current position that child and family services, including services to disabled children and support to carers and young carers are not chargeable. Also that currently the range of preventative services available to children, families and adults are not currently chargeable.	

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Section 6 - Sustainable Development

The Well-being of Future Generations Act (Wales) 2015 places a well-being duty on Swansea Council to carry out sustainable development. This is in line with the Council's Sustainable Development Policy and our Corporate Plan's Well-being Objectives. We must work in a way that improves the economic, social, environmental and cultural well-being of Wales, by taking action, in accordance with the sustainable development principle, aimed at achieving the well-being goals.

The sustainable development principle means we must act in a manner, which seeks to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs. We do this by applying the five ways of working.

6a) The Sustainable Development Principle's Ways of Working

The Five Ways of Working	Examples or summary of how applied
Long term - The importance of balancing short-term needs while safeguarding the ability to also meet long-term needs	The proposal is aligned to statutory requirements under the Social Services and Wellbeing (Wales) Act 2014, and towards achieving a sustainable model of social care. By ensuring that high quality services are available to meet the growing demand for social care, and the needs of an ageing local population.
Prevention - Acting to prevent problems occurring or getting worse	By implementing the national charging framework for social services, the Welsh Government intended that the Act would be cost neutral, and furthermore that by implementing social care charges would help offset the rebalancing of social care away from traditional building-based services and moving the whole systems towards prevention and wellbeing.
Integration -Considering impacts upon each of the well-being goals, well-being objectives, local well-being objectives, or on the objectives of other public bodies	Our focus in Adult Services remains on prevention and early intervention, increasingly within an integrated, whole health and social care system, supported by the West Glamorgan Regional Partnership Board's transformation programme and Area Plan.

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<p>Collaboration - Acting together with other services or external organisation towards our well-being objectives</p>	<p>Swansea Council aims to supporting vulnerable people with increasingly complex needs in their own homes within their own communities and towards achieving their own wellbeing outcome by collaborating with health and third sector partners locally and regionally.</p>
<p>Involvement - Involving people with an interest in achieving the well-being goals (everybody), and ensuring that those people reflect the diversity of the area served</p>	<p>Citizens are supported, to anticipate and manage their own care and support needs, through a collaborative, person centred planning, best interest processes carried out with family, carers or advocates.</p> <p>Collaborative communication and the ‘What Matters conversation’ are central as a social work practice approach within adult social care in Swansea, with the focus on improving wellbeing outcomes for citizens.</p> <p>Coproduction with service users and carers is central to service development and commissioning processes.</p>

6b) Contribution to Swansea Council’s Well-being Objectives

Our Corporate Plan’s Well-being objectives	Are directly supported by this initiative	Are not directly impacted by this initiative	May be in conflict or adversely impacted by this initiative
Safeguarding People from harm	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Improving Education and Skills	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Tackling Poverty	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Transforming our economy and infrastructure	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Maintaining and enhancing Swansea’s natural resources and biodiversity	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Transformation and Future Council development	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

6c) Thinking about your answers above, does the initiative support our Corporate Plan’s Well-being Objectives when considered together?

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Please consider the positives and negatives as a whole. This is an opportunity to analyse the global impact of the proposal where some objectives will be advanced whilst others may be impacted. Where there is a residual negative impact for one or more objectives please show that we have considered mitigation to ensure that negative impacts are lessened. Please detail any conflicts gaps and mitigation measures.

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6d) How is contribution to the National Well-being Goals maximised? Where can you add value? Consider the full goal description not just the title. Consider relevant [Journey Checkers](#). Complete the table below

Well-being Goal (click to view definition)	Primary Goals - tick if key	Any significant positive and/or negative impacts/contributions considered/mitigated
<p>A Prosperous Wales: An innovative, productive and low carbon society which recognises the limits of the global environment and therefore uses resources efficiently and proportionately (including acting on climate change); and which develops a skilled and well-educated population in an economy which generates wealth and provides employment opportunities, allowing people to take advantage of the wealth generated through securing decent work</p>	<input checked="" type="checkbox"/>	<p>The Welsh Government has developed the statutory framework for social care charging aimed at reducing the financial burden on individuals associated with current charging arrangements with the introduction of a maximum charge for non-residential care services. Swansea Council's approach to charging is integral to how we approach procurement and commissioning by ensuring fairness and transparency within the broader social care market.</p> <p>The proposal also supports the Council's budget principle of 'full cost recovery', and the corporate priority of safeguarding our most vulnerable people.</p> <p>Swansea's social services is working with Health partners towards net zero carbon targets, and achievement of progress is more likely as more people are supported within their own homes, within their local communities by a skilled, professional and local social care workforce.</p>
<p>A Resilient Wales: A nation which maintains and enhances a biodiverse natural environment with healthy functioning ecosystems that support social, economic and ecological resilience and the capacity to adapt to change (for example climate change).</p>	<input checked="" type="checkbox"/>	<p>The proposal on charging supports a vision of a longer term, sustainable model of social care in Swansea focused on improving the well-being outcome of the most vulnerable people in our communities, achieved through high quality services and a skilled, motivated workforce. Swansea Council is also concerned with the building of resilient communities who can support each other, through a collective, shared sense of health and wellbeing, and improving the environment.</p>

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<p>A Healthier Wales A society in which people’s physical and mental well-being is maximised and in which choices and behaviours that benefit future health are understood.</p>	<input checked="" type="checkbox"/>	<p>The four themes of the Quadruple Aim, within A Healthier Wales – the Welsh Government plan for health and social care are:</p> <ul style="list-style-type: none"> · Improved population health and wellbeing; · Better quality and more accessible health and social care services; · Higher value health and social care; and · A motivated and sustainable health and social care workforce <p>Swansea Council’s Adult Services has a transformation programme, supported by a regional work programme to deliver on these aims, and to modernise social care and to improve citizen’s experience of how their health and care needs are met. The future funding of social care and the resources available to meet demand remain the key areas of debate in Wales and the UK. Charging is likely to remain an important lever in meeting increasing demand for social care, with better quality and available resources.</p>
<p>A More Equal Wales A society that enables people to fulfil their potential no matter what their background or circumstances.</p>	<input checked="" type="checkbox"/>	<p>This proposal presents an approach to charging that will be equitable, fair and transparent. Services and support will deliver the same high quality of care, and achieve more equal health and wellbeing outcomes, for everyone in Swansea.</p>
<p>A Wales of Cohesive Communities Attractive, viable, safe and well-connected communities.</p>	<input checked="" type="checkbox"/>	<p>This will need to be an ongoing conversation with citizens, communities and the local population about how best their care and support needs can be met, and through coproduction helping to shape the future model of adult social care.</p>
<p>A Wales of Vibrant Culture & Thriving Welsh Language A society that promotes and protects culture, heritage and the Welsh language, and which encourages people to participate in the arts, sports and recreation.</p>	<input checked="" type="checkbox"/>	<p>The proposal supports Swansea Council’s Adult Service model which meeting Welsh Language standards through an active offer, focus on using Welsh language to improve the quality of service provision, building on the standards of the Mwy na Geiriau (More than Just Words) framework, so that more people can communicate in their language of choice.</p>
<p>A Globally Responsible Wales A nation which, when doing anything to improve the economic, social, environmental and cultural well-being of Wales, takes account of whether doing such a thing may make a positive contribution to global well-being.</p>	<input checked="" type="checkbox"/>	<p>The focus on how charges support improvement in quality and value of social care provision in safeguarding our most vulnerable within a sustainable model are internationally recognised concepts, supported by global learning, and professional communities.</p>

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Section 7 - Cumulative Impact/Mitigation

What is the cumulative impact of this proposal on people and/or communities when considering all the impacts identified within the IIA and any other key decisions affecting similar groups/ service users made by the organisation?

It is not anticipated that this proposal will adversely impact people and communities, as there are strong and established processes, set both nationally and locally in place to mitigate such impacts, as outlined.

Further action is needed to ensure that the mitigating actions are delivered as expected, and to monitor further clients and groups who are being charged for non-residential social care services.

Any mitigation needed:

It is important that you record the mitigating actions you will take in developing your final initiative.

Record here what measures or changes you will introduce to the initiative in the final draft, which could:

- reduce or remove any unlawful or negative impact/ disadvantage
- improve equality of opportunity/introduce positive change
- support the Well-being of Future Generations Act (Wales) 2015
- reduce inequalities of outcome resulting from socio-economic disadvantage

Unlawful or Negative Impact Identified	Mitigation / Positive Actions Taken in the initiative (add to action plan)
Negative impact identified as women are generally more highly represented amongst users of adult social care, and as carers and have lower income, any uplift to charges could have a disproportionate impact on a small number of women whose care received remains under the maximum weekly threshold.	Profile local population subject of non- residential charging for protected characteristics Monitor clients falling below the threshold for the maximum weekly charge based on actuals
Negative impact identified as some older adults who receive care packages from the Council may find they are charged or charged more for the same service	Monitor clients falling below the threshold for the maximum weekly charge based on actuals
Negative socio-economic impact identified as we estimate 25% of people (based on a sample week) charged for non-residential adult social care services, fall below the threshold for the maximum weekly charge (currently set by Welsh Government at £100, but this may be subject to increase in 2023/24).	Close liaison with Welsh Government to understand impact and mitigation needed if the maximum weekly charge increased Monitor clients falling below the threshold for the maximum weekly charge based on actuals

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<p>Negative impact identified as the wider cost-of-living crisis and inflationary pressures are having a disproportionate impact on those people in receipt of social care their carers and families. We do have to consider how poverty can impact on the wellbeing and care and support needs of the most vulnerable citizens.</p>	<p>Finalised corporate debt recovery policy to ensure that a fair and compassionate approach is taken when working with individuals and families who are in arrears through charges.</p> <p>Ensure policy is understood, implemented and adhered to, to mitigate this impact</p>
<p>Negative impact identified as cost-of-living crisis and inflationary pressures are having a disproportionate impact on those people in receipt of social care their carers and families. We do have to consider how poverty can impact on families and the community resilience and cohesion.</p>	<p>Continue to provide a range of services to support families and communities and to help manage the wider impacts.</p> <p>Ensure there are promoted and made available for all through implementation of Swansea Council Tackling Poverty strategy</p>
<p>Negative impact to service users who receive care and support from the Council and who are expected to pay for services, regardless of disabilities. Initial analysis shows that some younger adults and people with a learning disability could be impacted depending upon their assessed package of care, whether their chargeable hours of care are under the maximum weekly threshold.</p>	<p>Monitor clients falling below the threshold for the maximum weekly charge based on actuals</p> <p>Monitor clients with disabilities who receive care packages from the Council to identify if they are charged or charged more for the same service.</p>

Section 8 - Monitoring arrangements: The IIA process is an ongoing one that does not end when the initiative is agreed and implemented. Please outline the monitoring arrangements and/or any additional data collection that will help you monitor any equality impacts, risks, sustainability of your initiative once implemented:

Monitoring arrangements:

Adult Services to monitor the number of clients who are assessed at above maximum weekly charges and yet are falling below the threshold for the maximum weekly charge (based on actuals), and type of service received, and to develop reporting to profile this cohort against local population data, as well as protected characteristics, such as age, race and gender.

Actions (add to action plan):

- Monitor clients falling below the threshold for the maximum weekly charge based on actuals
- Profile local population subject of non- residential charging for protected characteristics
- Monitoring population impact as part of the annual review of charging.

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Section 9 – Outcomes:

Having completed sections 1-8, 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.

Section 10 - Publication arrangements:

On completion, please follow this 3-step procedure:

1. Send this IIA 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 IIA from your Head of Service. The IIA will be published on the Council's website - this is a legal requirement.

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Action Plan: Please outline below any actions identified throughout the assessment or any additional data collection that will help you monitor your initiative once it is implemented:

Action	Dates	Timeframe	Lead responsibility	Progress	Add to Service Plan
Finalise and publish financial assessment guidance	December 2023	As supplement to Council's Charging policy	Head of Adult Services	In development	Adult Services 2023/24
Implement Swansea Council Tackling Poverty strategy	March 2024	As strategy	Head of Adult Services		Tackling Poverty Services 2023/24
Implement Swansea Council Prevention strategy	March 2024	As strategy	Head of Adult Services		Tackling Poverty Services 2023/24
Finalise Council Debt strategy (work in draft)	December 2023	As part of current work programme	Safeguarding People and Tackling Poverty Corporate Delivery Committee	In development	Tackling Poverty Services 2023/24
Monitor clients falling below the threshold for the maximum weekly charge based on actuals	December 2023	To develop reporting systems	Adult Services Senior Management team		Adult Services 2023/24
Profile local population subject of non- residential charging for protected characteristics	December 2023	Data to inform local population assessment and targeted support	Adult Services Senior Management Team		Adult Services 2023/24
To review and update the Councils' process for annual review of social services charges	December 2023	Ahead of next annual review of social services charges	Commissioning Lead/ Corporate lead		Commissioning & Partnerships 2023/24

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