



North Wales Learning Disability Strategy v1

Wellbeing Impact Assessment Report

This report summarises the likely impact of a proposal on the social, economic, environmental and cultural well-being of the region, Wales and the world.

Assessment Number:	302.1								
Brief description:	<p>The North Wales Learning Disability Strategy sets out how we will work towards integrated learning disability services in North Wales.</p> <p>Support for people with learning disabilities is a priority in the North Wales Regional Plan (Area Plan) based on what people told us was important to them as part of the population assessment produced by the Regional Partnership Board.</p> <p>The Social Services and Well-being (Wales) Act 2014 includes a statutory duty for Regional Partnership Boards to prioritise the integration of services in relation to people with learning disabilities.</p>								
Date Completed:	August 2018, Version: 1								
Completed by:	<table><tr><td>Sarah Bartlett</td><td>Regional Collaboration Team</td></tr><tr><td>Neil Ayling</td><td>Flintshire County Council</td></tr><tr><td>Claire Lister</td><td>Conwy County Borough Council</td></tr><tr><td>Lesley Singleton</td><td>BCUHB</td></tr></table>	Sarah Bartlett	Regional Collaboration Team	Neil Ayling	Flintshire County Council	Claire Lister	Conwy County Borough Council	Lesley Singleton	BCUHB
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Key stakeholders and consultation	<p>The plan will affect people with children, young people and adults with learning disabilities and their parents/carers.</p> <p>We consulted with people through established groups, face to face interviews, workshops and an online questionnaire. The questionnaire was also available in easy read.</p> <p>For details see the strategy consultation report.</p>								

Policies that may affect the proposal	<p>Social Services and Well-being (Wales) Act 2014</p> <p>Well-being of Future Generations (Wales) Act 2015</p> <p>Regulation of Social Care (Wales) Act 2016</p> <p>Children Act 1989</p> <p>Childcare Act (2006)</p> <p>Additional Learning Needs and Education Tribunal Bill 2015</p> <p>United Nations Convention on the Rights of the Child</p> <p>Play Sufficiency Duty</p> <p>Strategy for Older People in Wales 2013-23</p> <p>United Nations Principles for Older Persons</p> <p>Welsh Government Declaration of the Rights of Older People in Wales</p> <p>Mental Health (Wales) Measure 2010</p> <p>Mental Capacity Act 2005</p> <p>Violence Against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015</p> <p>Serious Crimes Act</p> <p>Housing (Wales) Act 2014</p>
Responsible Service:	Regional Partnership Board
Localities affected by the proposal:	North Wales

IMPACT ASSESSMENT SUMMARY AND CONCLUSION

Before we look in detail at the contribution and impact of the proposal, it is important to consider how the proposal is applying the sustainable development principle. This means that 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."

Score for the sustainability of the approach

Could some small changes in your thinking produce a better result?

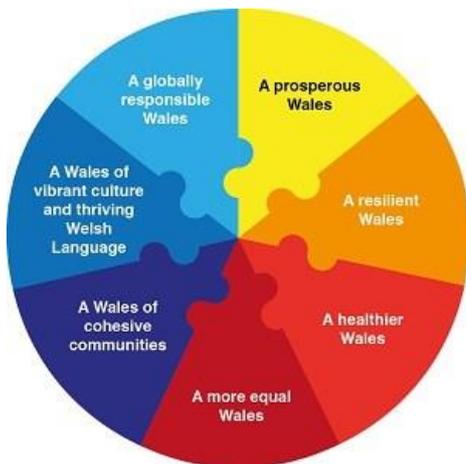


(3 out of 4 stars)

Actual score : 20 / 24.

Summary of impact

Wellbeing Goals



A prosperous region	Positive and negative
A resilient region	
A healthier region	Positive
A more equal region	Positive and negative
A region of cohesive communities	Positive
A region of vibrant culture and thriving Welsh language	Positive
A globally responsible region	Positive

Main conclusions

The aim of the plan is to show how we will integrate services for people with learning disabilities in North Wales. If the plan's aims are achieved it should have a positive impact on people's health, reduce inequalities and support the development of cohesive communities in North Wales.

There are potential negative impacts which may result, particularly from difficult choices about where to prioritise investment which may disadvantage some groups over others. There are also potential positive and negative impacts from the way we will commission, procure and use and develop physical assets in the region to meet care and support needs.

The impact assessment has highlighted some potential impacts of the Learning Disability Strategy and we recommend that the impacts continue to be assessed as further strategic and operational decisions are made about how to implement the plan.

The approach taken to completing the Well-being Impact Assessment was to discuss the assessment at a meeting of the project leads.

THE LIKELY IMPACT ON THE REGION, WALES AND THE WORLD

A prosperous region

Overall Impact	Positive and negative
Justification for impact	There are potential negative impacts on progress towards a low carbon society as the focus on meeting care and support needs may not lead to the most energy efficient model of service provision. There may be a negative impact on economic development as there is a risk that integration and new service models will mean fewer jobs available. There also may be positive impacts on economic development from including more people with learning disabilities into the workforce. The models chosen may also have positive impacts on progress towards a low carbon society and economic development.

Positive consequences identified:

Providing services closer to home and making the most of support available from friends, family and within local communities can be more efficient and reduce the need to travel. There may be positive impacts from the development of extra care and shared housing which use energy efficiently, for example, for heating.

The social care and health sectors can have a positive impact on the local economy by providing employment and business opportunities for providing care as well as providing products and services to care providers. Improving employment opportunities for people with learning disabilities can also have a positive impact on the local economy.

Developing the health and social care workforce is a key element of delivering the strategy which will contribute to quality jobs in the region. The choice of service model and provider could have a positive impact on the number, quality and length of jobs available. See the regional workforce strategy for more information.

Will need to consider best use of communications, infrastructure and transport when choosing where to base services.

The plan may affect the workforce's childcare needs and childcare may be needed to make services accessible and to support parent carers.

Unintended negative consequences identified:

There may be negative impacts on energy efficiency of service models that support people in their own homes instead of shared housing or care homes. These models may also increase the distances support workers travel. Working regionally to develop the strategy creates more car journeys as people travel to meetings.

Working regionally to use buying power to reduce costs can have negative impacts on the economy if it leads to low paid, insecure employment and reduces the ability of providers to invest in their businesses. Commissioning larger scale contracts can make it more difficult for small, local providers to compete in the market.

Making services more efficient may mean reducing the number of jobs. The choice of service model and provider could have a negative impact on the number, quality and length of jobs available.

Will need to consider best use of communications, infrastructure and transport when choosing where to base services.

The plan may affect the workforce's childcare needs and childcare may be needed to make services accessible.

Mitigating actions:

Considering the impacts when more is known about the specific models will help mitigate the impacts. We can look at ways to reduce the carbon footprint of developing the Learning Disability Strategy by looking at the number of meetings held and the way people travel to them, for example, meeting in places accessible by public transport or encouraging car sharing. We have tried to make use of existing meetings wherever possible including the Learning Disability Partnership, North Wales Managers of Services for Disabled Children Group and Learning Disability Regional Participation Group.

A resilient region

Overall Impact	
Justification for impact	The impact will need to be considered when more is known about building projects which may result from the regional plan.

Positive consequences identified:

Learning disability services developed in response to strategy will need to consider how they can reduce waste, reuse and recycle. This could be considered as part of the commissioning process.

Services developed will need to consider how they can reduce energy/fuel consumption. This could be considered as part of the commissioning process.

People's awareness of the environment and biodiversity may not be affected directly but there may be specific projects, for example, to improve well-being by making the most of the natural environment, which will have a positive impact.

Unintended negative consequences identified:

The strategy may lead to building projects which could have a negative impact on biodiversity and the natural and built environment.

Developing a regional strategy does lead to increased fuel consumption due to travelling to meetings. The strategy may lead to building projects which could have a negative impact on flood risk management.

Mitigating actions:

The energy/fuel consumption of developing regional projects can be minimised by making use of technology to reduce the number of meetings and encouraging people to use public transport, car share and use fuel efficient vehicles to travel. We have tried to make use of existing meetings wherever possible including the Learning Disability Partnership, North Wales Managers of Services for Disabled Children Group and Learning Disability Regional Participation Group. There may be opportunities to promote awareness of the environment and biodiversity when developing projects to improve well-being.

A healthier region

Overall Impact	Positive
Justification for impact	Overall the regional plan aims to improve health and should have a positive impact.

Positive consequences identified:

'Being healthy' is one of the main themes in the strategy which aims to improve the health and well-being of people with learning disabilities and address health inequalities. This includes improving take-up of cancer screening services.

Access to good quality, healthy food: the consultation identified concerns that people in supported living accommodation may not have access to good quality, healthy food. The strategy should help to address this.

Providing support based around 'what matters' to people should help increase participation in chosen leisure opportunities along with the strategies aims to include people with learning disabilities in local community activities.

The strategy is closely linked to the North Wales Together For Mental Health Strategy and should promote mental well-being and support people who have a learning disability and mental health needs.

The strategy includes recommendations for improving access to health care.

Unintended negative consequences identified:

Access to good quality, healthy food: services delivered in response to the regional plan do provide food which may have a negative impact. Will need to be considered by each service.

Mitigating actions:

To minimise any negative impacts the specific health impacts of services should be considered as they are developed.

A more equal region

Overall Impact	Positive and negative
Justification for impact	<p>We can say the impact on tackling poverty will be positive more confidently than the impact on people with protected characteristics. The plan promotes advocacy which can help to improve the well-being of people with protected characteristics. The impact assessment will need to be revisited as plans progress.</p> <p>Implementation of integrated services, including a workforce plan, will need to ensure we collectively alleviate poverty. Any issues around workforce pay and conditions will be considered further along in the process. Due to the higher than average proportion of people from ethnic minority groups employed in health and social care employed in North Wales changes to the workforce may have a disproportionate impact on these groups.</p>

The protected characteristics considered are:

- Age
- Disability
- Gender reassignment
- Marriage or civil partnership
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual orientation
- *For Welsh Language, please see [a region of vibrant culture and thriving Welsh language](#)*

Using a screening tool we identified potential positive and negative impacts of the plan on all protected groups (appendix 1). The areas we considered were:

- Does the proposal relate to an area where there are known inequalities?
- To what extent will service users, employees or the wider community be affected?
- How will you know the needs of people with protected characteristics? What about individuals who have multiple protected characteristics? Does it relate to an area where there is a lack of published research or other evidence?
- Does it relate to an area where your organisation has set equality outcomes?
- Is there any evidence of higher or lower take-up or satisfaction by any of the identified groups?
- If there are limitations or barriers to access, do these amount to unlawful discrimination or is there potential for reducing inequalities or improving outcomes?

Positive consequences identified:

Improving the well-being of people with protected characteristics

The strategy aims to improve the well-being of people with learning disabilities based around what matters to them. This should have positive impact on people with protected characteristics related to disability. People with learning disabilities may have other protected characteristics and experience additional disadvantage because of these. For example, older people with learning disabilities and people with profound and multiple disabilities and the use of the Welsh language. In the Criminal Justice System people may face additional disadvantage due to race/ethnicity in addition to disadvantage faced due to their learning disability. The strategy aims to take account of these different needs by providing person-centred services which should help to address inequalities.

Because the strategy is being produced on a regional basis it's easier for people with protected characteristics to get involved which may have financial benefits, avoid duplication and so on.

There is more information in the population assessment which includes an equalities and human rights section in each chapter which summarises the evidence available about the needs of people with protected characteristics and any gaps. The evidence used included research reports and consultation. A full consultation report is available.

Addressing/reducing health inequalities

A key theme of the strategy is around reducing health inequalities which will look at improving take up of cancer screening services, supporting wider health services to make reasonable adjustments for people with learning disabilities and promoting healthier lifestyles.

Tackling poverty

The strategy aims to tackle poverty by increasing the number of people with learning disabilities in paid employment. There are many factors that could affect poverty outside the control of the plan, such as changes to the benefits system and the introduction of Universal Credit. These were highlighted as concerns in the consultation.

Unintended negative consequences identified:

Improving the well-being of people with protected characteristics

Raised expectations as a result of consulting.

Raised expectations of the third sector to deliver and meet needs.

The capacity of the public sector to meet the needs identified in the strategy.

The strategy may not identify cumulative impacts, for example, on people with a number of different protected characteristics, or combined with other needs such as poverty or caring responsibilities.

There is more information in the population assessment reference library and population assessment consultation report about issues facing these groups.

Feedback from the consultation for the population assessment highlighted concerns that the ethnic minority and migrant population in North Wales is exposed to conditions of rising hostility and is vulnerable to the harassment that has been

identified as contributing to mental health problems, especially in rural locations. It also highlighted the need to take account of the different needs of women and men.

One in four people from a BAME background employed in North Wales are employed in the health and social care sector. Any changes from the plan that affect the workforce could have a disproportionate impact on these groups.

Tackling poverty

Services are increasingly accessed online – a reduction in alternatives could have a disproportionate impact on people who don't have access to the internet due to poverty or protected characteristics. The strategy includes an aim to increase the use of technology to support people with learning disabilities to live independently.

Mitigating actions:

The strategy includes a section on equality and human rights which highlights the importance of taking into account additional disadvantage people who have more than one protected characteristic may experience.

Some groups representing people with protected characteristics responded and engaged but we have less detailed information/engagement with groups/people representing other people with protected characteristics. As services are developed we need to talk to people about the detail, for example, moving some services can have a positive impact on some and negatively impact others. However, a more strategic regional approach has to improve service provision and reduce/remove gaps.

We will take a co-productive approach to putting the strategy into action which means that where possible individuals will become more involved in the design and delivery of services. This will help make sure that the different needs of individuals with protected characteristics are met.

Equality principles to be considered: Equality of opportunity and equality of access, for example, education, housing, access to outdoor space, transport and connectivity between areas, public amenities, access to the natural environment, information technology, health care and leisure, the cost of participation. Equality monitoring and analysis - commitment to on-going engagement each area to refer to its own Strategic Equality Plan and take necessary steps. We need to make an ongoing commitment to co-production.

During the equality impact assessment process the strategy has been amended to include findings from the consultation about the impact on people with protected characteristics.

The progress against the plan and outcomes will be monitored through the Regional Partnership Board's annual report.

Evidence documents

North Wales Learning Disability Strategy Consultation Report

North Wales Regional Plan Consultation Report

North Wales Population Assessment

North Wales Population Assessment Consultation Report

Social Services and Well-being (Wales) Act 2014 Part 2 Code of Practice (General Functions)

Population assessment toolkit (Social Care Wales)

Area plan template (Social Care Wales)

Welsh Government Part 2 Equalities Impact Assessment

Strategic Equality Plans of the six local authorities and BCUHB

Population Assessment reference library (see Endnote database). The library includes:

- research reports, for example, on developing inclusive residential care for older LGBT people;
- findings from other consultations with people with protected characteristics, such as a report on access to statutory services from the perspective of Minority Ethnic Elders in North Wales;
- links to statistics measuring inequality in North Wales.

A region of cohesive communities

Overall Impact	Positive
Justification for impact	If the aims are achieved the Learning Disability Strategy should have a positive impact on community cohesion. The impact will depend on what mitigation we put in place and the links with the other strategies. It may change over time as people are involved and projects develop.

Positive consequences identified:

Links with North Wales Safeguarding Adults and Children's Boards; Area Planning Board.

Plan to continue participation as the strategy is put into action. The strategy includes information about advocacy and an active offer of services in Welsh as well as promoting the role of the third sector and social enterprises.

More appropriate housing for vulnerable groups in safe areas. Links to LDP and housing strategies and transport strategies.

Unintended negative consequences identified:

Supporting some communities at the expense of others can cause problems. Promoting independent living - can be risks around safeguarding, victims of crime, fraud

Focus on people who are engaging or have an advocate means we can miss people who are not. Other groups may see housing for vulnerable people having a negative effect on their area.

Mitigating actions:

Clear communication to bring people along with us and make sure they are included. Engage with hard to reach groups and support hard to reach groups to engage with us, including people with one or more protected characteristics. Changing the way we do engagement to make it more accessible, go to places where people are. Challenges around resourcing this. Respond to engagement, make sure it helps shape services. Independent living - consider safeguarding, isolation issues, transport, social groups participation - what matters conversations. If the 'what matters' approach is working, these issues will be mitigated. Think about how we collate the information from 'what matters' conversations to inform services.

A region of vibrant culture and thriving Welsh language

Overall Impact	Positive
Justification for impact	The Learning Disability Strategy aims to improve services available in the Welsh language.

Positive consequences identified:

The population assessment included a Welsh language profile and identified that there is a need for more services in Welsh and the consultation supported this finding.

The Learning Disability Strategy regional plan supports the requirement to make an 'active offer' of Welsh language services. This needs to be considered further when developing services.

The consultation identified opportunities to use culture and heritage to support well-being, for example, through social prescribing. Focussing on what matters to people should help access to culture and heritage they choose.

Unintended negative consequences identified:

If we are not able to recruit enough Welsh speaking staff our services could have a negative impact on the number of people using Welsh.

Mitigating actions:

See the regional workforce strategy and 'More than Words' project for more information.

A globally responsible region

Overall Impact	Positive
Justification for impact	There are benefits to working together as a region to write the strategy. Need to make sure we recognise the differences between areas and take the differences into account when designing services to meet local needs rather than regional structures.

Positive consequences identified:

Local, national and international supply chains are something to be considered as part of the projects when they reach the purchasing stage. Good commissioning will help providers plan services in future. We need to be clear about what's needed.

Integration of services done well should help. The Social Services and Well-being (Wales) Act 2014 requires us to support social enterprises.

The strategy puts a spotlight on specific human rights issues that can affect people in receipt of services, such as prisons, children's and older people's rights, trafficking. Making support available for people who are vulnerable can help uphold people's rights, such as support to stay at home and right to family life.

Coproduction approach - people's right to have a say and advocacy.

Should help to inform other provision. It should also make us more aware of what other organisations are doing and help us be more consistent which will help other organisations and service users navigate the systems.

Unintended negative consequences identified:

The more you integrate services, they become larger which makes larger national/international providers more likely to bid for them which can have a negative impact on local organisations. This can affect the market. Larger organisations may be more likely to buy from international suppliers which can have negative impact on local businesses. Need a coordinated approach to community benefits. Make sure local people can access jobs that are being created and we don't exclude accidentally, for example, with training requirements. If we don't get the engagement correct we may miss out picking up on human rights issues affecting hard to reach groups. If we don't get advocacy or coproduction right or people can't access services it will have a negative impact. Decisions around allocation of resources may have negative impacts. Regional working could make it less obvious how to engage. Who's delivering or leading on what, loss of local relationships, learning from other regionalisation projects. Impacts on smaller organisations who don't have capacity to work at local level. Standardising services may mean loss of good practice in some areas.

Mitigating actions:

Support other stakeholders and partners to form consortiums and partnerships so they can work more effectively at a regional level. Support small organisations to expand or increase capacity to work at a regional level.

Appendix 1: Screening tool

	Age	Disability	Gender reassignment	Marriage or civil partnership	Pregnancy and maternity	Race	Religion or belief	Sex	Sexual orientation	Welsh language
Does the proposal relate to an area where there are known inequalities?	Yes									
Will the proposal have a significant effect on these groups?	Yes									
How will you understand people's needs?	See population assessment and consultation reports									
Evidence of higher or lower take-up or satisfaction?	See population assessment and consultation reports									
Does the proposal discriminate against these groups?	Positive and negative effects									
Is there potential for reducing inequalities or improving outcomes?	Yes									