

Integrated Impact Assessment – Summary Report

Each of the numbered sections below must be completed
Please state if the IIA is interim or final

Interim report	<input checked="" type="checkbox"/>	Final report	<input type="checkbox"/>
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 (Tick as appropriate)

1. Title of proposal

Self-Directed Support (SDS) – Optimisation of Funds

2. What will change as a result of this proposal?

There are challenges acknowledged by Scottish Government across Scotland in delivering all the Options within the SDS Act 2013. Edinburgh is not unique in facing these challenges, however our higher than average take up rates of SDS Option 1 - Direct Payments (DP's) suggests that this area offers fuller opportunities for "right sizing", with any payments made better matching actual assessed need.

Recovery of unused funds is a normal aspect of individualised funding and a public duty common to all Councils. In 22/23 post Covid unused DP funds were recovered to the extent of £4.8M. Reducing the number of DP's paid via BACS and transfer to Allpay may also deliver efficiencies through greater transparency and simpler review and recovery. Whilst this post Covid year may be atypical in pattern, greater use of Allpay to replace BACS where possible, alongside investment in 1.8 WTE Self Directed Support Advisors and 0.5 WTE Senior Social Worker to increase capacity to review DP's at a cost of £93K pa, would bring in funds of £2M over and above a general budgeted pattern of £3.2M.

This would be achieved by review of unspent funds against the assessment of eligible needs carried out by experts in the use of self-directed support and would provide assurance that funds were spent in line both with assessed needs and in the spirit and legitimacy of the SDS Act 2013. All reviews would be carried out in a person-centred and supportive manner to ensure that any changes were handled sensitively and the person felt supported throughout.

Further work needs to be undertaken to set out the work required and associated cost to make SDS Option One more attractive to individuals wishing to use personal assistants (PA's). The use of PA's can be hugely beneficial for both the individual and the public pound by removing overhead and management cost layers however currently this market is limited by low pay rates which limits the pool of people interested in working as PA's.

3. Briefly describe public involvement in this proposal to date and planned

No public involvement is planned.

4. Is the proposal considered strategic under the Fairer Scotland Duty?

No


5. Date of IIA

24 May 2023

6. Who was present at the IIA? Identify facilitator, lead officer, report writer and any employee representative present and main stakeholder (e.g. Council, NHS)

Name	Job Title	Date of IIA training
Nikki Conway	South East Locality Manager	
Ashley Masz	SDS Advisor	
Janne Solpark	3C Practice Lead	
Laura Stirling	Hub Manager, North West	
Christine Farquhar	Carer and Service User Representative, EIJB	
Pete Pawson	Interim Programme Director	March 2023
Rhiannon Virgo	Project Manager	Feb 2020
Denise McInerney	Executive Assistant	March 2023

7. Evidence available at the time of the IIA

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal
Data on populations in need	Population and demographics - Edinburgh Health & Social Care Partnership (edinburghhsc.scot)	Provides current and projected data on the wider population in the City of Edinburgh
Data on service uptake/access	<p>Swift/AIS reporting on request.</p>  <p>SDS uptake 19 May 2023.xlsx</p> <p>National Benchmarking data</p> <p>Allpay reporting of active accounts.</p> <p>BACS reporting of active accounts.</p> <p>Community Waits reports – updated and shared weekly.</p>	<p>Uptake As of 18 May 2023 15% of care services in Edinburgh were provided via a DP.</p> <p>There are 650 adults with a DP with a gross spend of £24M, and 675 older people with a gross spend of £14M.</p> <p>ISF: 209 adults with a gross spend of £13M, and 96 older people with a gross spend of £2M.</p> <p>Option 3: 2408 adults and 3743 older people</p> <p>2021/22 LGBF data shows good performance in Edinburgh for DP uptake.</p> <p>Circa 1,150 Allpay accounts are currently active and used for DPs.</p> <p>The number of active Allpay and BACS accounts fluctuates over time.</p> <p>Access Community Waits reports show the number of people awaiting an assessment, which has the potential to result in a DP being the preferred option for service delivery.</p>

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal
Data on socio-economic disadvantage e.g. low income, low wealth, material deprivation, area deprivation.	<i>Joint Strategic needs Assessment City of Edinburgh HSCP (2020)</i>	Provides current and projected data on the demographics within Edinburgh
Data on equality outcomes		
Research/literature evidence		
Public/patient/client experience information	Complaints/ compliments	https://www.vocal.org.uk/wp-content/uploads/2021/11/Edinburgh-Report-2021.pdf highlights carer trends and experiences
Evidence of inclusive engagement of people who use the service and involvement findings	Complaints/ compliments Care assessment	
Evidence of unmet need		
Good practice guidelines	Procedure document SDS Factsheet Financial Management of SDS	DP Recovery procedure being drafted for September 2023. Produced by Self-directed Support Scotland. CIPFA guidance for financial managers to support flexible use of DP's whilst adhering to the principles of SDS legislation.
Carbon emissions generated/reduced data		
Environmental data		
Risk from cumulative impacts		
Other (please specify)		

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal
Additional evidence required		

8. In summary, what impacts were identified and which groups will they affect?

Equality, Health and Wellbeing and Human Rights	Affected populations
<p>Positive</p> <ul style="list-style-type: none"> • Increased support/education available for people using or considering using Direct Payments or ISF, and for their families and carers. A dedicated team will help people with low literacy or digital literacy as they will be available to give advice. • This may help to keep carers, and particularly women, in employment, as there will be less uncertainty over available support and how it may be used • Being clearer at the outset about the parameters of a DP will reduce the potential for unintentional misuse or misunderstanding of what it can be used for, which will decrease anxiety for individuals and carers. People have expressed anxiety about having unspent funds in their accounts, so speeding up the reclaim will mitigate against this • Person-centred, supportive reviews will help people to understand why changes may be made, and to ensure that they feel comfortable with this • Carers can be reluctant to use DPs as they can add to stress, and a greater emphasis on/support with ISF would be beneficial • Promoting the use of Personal Assistants (PAs) will increase choice and flexibility of support • PAs represent a large workload for the carer in terms of managing payroll, schedules, recruitment, training etc, and this proposal may offer support with that by increasing the pool of available PAs. 	<p>All adults accessing services, including older adults, people of middle years, young adults, adults with physical or learning disabilities, long-term conditions, mental health issues or sensory loss.</p> <p>Carers, and particularly women.</p> <p>People with low levels of literacy or digital literacy</p>

Equality, Health and Wellbeing and Human Rights	Affected populations
<ul style="list-style-type: none"> Increased numbers of PAs available may have a positive impact on the quality of family life individuals and carers may experience, promoting social inclusion and family resilience Increased PA workforce may also positively affect people living in areas where it can be difficult to access care at home Increased education for staff on SDS options and management, including developing a staff toolkit and ongoing learning/training options. This would also include supporting staff to have difficult conversations when they identify misuse of payments 	<p>Rural/semi-rural communities</p> <p>Staff</p>
<p>Negative</p> <ul style="list-style-type: none"> This proposal may not go far enough to provide sufficient support for people, families and carers in the use of SDS, and it may be difficult to instil confidence that DP/ISF are viable options Pay scales for PAs remain a barrier to increasing the available workforce There may be an increase in volume of work for supporting teams eg Transactions in processing DPs, however, this may be mitigated by process improvement work 	<p>All adults accessing services, including older adults, people of middle years, young adults, adults with physical or learning disabilities, long-term conditions, mental health issues or sensory loss.</p> <p>Carers, and particularly women.</p> <p>Staff</p>

Environment and Sustainability including climate change emissions and impacts	Affected populations
<p>Positive</p> <ul style="list-style-type: none"> Increased numbers of PAs may increase local options, therefore reducing travel/emissions 	<p>All</p>
<p>Negative</p> <ul style="list-style-type: none"> None identified 	

Economic	Affected populations
<p>Positive</p> <ul style="list-style-type: none"> Improved practice around financial management will ensure that the Partnership is delivering best value 	<p>All adults accessing services, including older adults, people of middle years, young adults,</p>

Economic	Affected populations
<ul style="list-style-type: none"> Increased employment opportunities for people within Edinburgh as PAs PAs may support individuals to access employment or education 	adults with physical or learning disabilities, long-term conditions and sensory loss. Carers Business community
Negative <ul style="list-style-type: none"> Some people may have the perception that reclaiming unspent monies will affect them financially, however, this will be mitigated by a person-centred conversation and full discussion of each person's circumstances and support needs 	All

9. Is any part of this policy/ service to be carried out wholly or partly by contractors and if so how will equality, human rights including children's rights, environmental and sustainability issues be addressed?

Services associated with this proposal will be provided across CEC, voluntary and/or private sector organisations, most of which are commissioned or purchased by the Partnership. All equality, human rights, environmental and sustainability issues are covered by the Contractual or Framework Agreements, good practice guidance or the contracted terms and conditions. Where it is required continued oversight, monitoring and assured sustainability will be provided by the Partnership. Where children/ young people are within scope, they too will be covered as above.

10. Consider how you will communicate information about this policy/ service change to children and young people and those affected by sensory impairment, speech impairment, low level literacy or numeracy, learning difficulties or English as a second language? Please provide a summary of the communications plan.

All communications plans/ strategies will be compliant with;

- UK Government guidance on Accessible Communication formats (2021); and
- The Public Sector Bodies (Websites and Mobile Applications) (No. 2) Accessibility Regulations 2018.

Consideration will also be given to the use of different mediums and channels for sharing information.

If this proposal is agreed, a full communications plan will be developed as part of the implementation process.

11. Is the plan, programme, strategy or policy likely to result in significant environmental effects, either positive or negative? If yes, it is likely that a Strategic Environmental Assessment (SEA) will be required and the impacts identified in the IIA should be included in this. See section 2.10 in the Guidance for further information.

No

12. Additional Information and Evidence Required

None

13. Specific to this IIA only, what recommended actions have been, or will be, undertaken and by when? (these should be drawn from 7 – 11 above) Please complete:

Specific actions (as a result of the IIA which may include financial implications, mitigating actions and risks of cumulative impacts)	Who will take them forward (name and job title)	Deadline for progressing	Review date
Review of IIA once implementation plan is complete	Nikki Conway, South East Locality Manager and SRO – SDS		July 2023
Consider training for PAs and an SDS Programme Board as part of the implementation planning process	Nikki Conway, South East Locality Manager and SRO – SDS		August 2023

14. Are there any negative impacts in section 8 for which there are no identified mitigating actions?

Mitigating actions have been identified for all negative impacts.

15. How will you monitor how this proposal affects different groups, including people with protected characteristics?

This proposal will continue to be reviewed with ongoing consideration to any impacts that arise.

16. Sign off by Head of Service

Name

Mike Massaro Mallinson, Head of Operations

Date

26 May 2023

17. Publication

Completed and signed IIAs should be sent to:

integratedimpactassessments@edinburgh.gov.uk to be published on the Council website www.edinburgh.gov.uk/impactassessments

Edinburgh Integration Joint Board/Health and Social Care

sarah.bryson@edinburgh.gov.uk to be published at www.edinburghhsc.scot/the-ijb/integrated-impact-assessments/