

# Single Impact Assessment

Cardiff Council



## 1. Details of the Proposal

### What is the proposal?

Title: Increasing the use of Direct Payments by creating a pool of micro-enterprises

### Is this a new proposal or are you amending an existing policy, strategy, project, procedure or service?

New

Existing

### Directorate/Service Area:

Adults, Housing & Communities

### Who is developing the proposal?

Name: Taliesin Davies

Job Title: Improvement Project Manager

### Responsible Lead Officer (Director or Assistant Director):

Jane Thomas

### Cabinet Portfolio:

Councillor Norma Mackie/Councillor Ash Lister

Authorisation	
Completed By:	Taliesin Davies
Job Title:	Improvement Project Manager
Date:	03/08/2023
Approved By:	
Job Title:	

**Document History – do not edit**

*The Single Impact Assessment (SIA) can be strengthened as time progresses, helping shape the proposal. Version control will provide a useful audit trail of how the SIA has developed. Draft versions of the assessment should be retained for completeness, however only the final version will be publicly available. Draft versions may be provided to regulators if appropriate.*

Version	Author	Job Title	Date
1	Fiona Gibson	Senior Corporate Policy Officer	12/10/2022
2	Fiona Gibson	Senior Corporate Policy Officer	12/04/2023

## 2. Overview of the Proposal

### **What action is the Council considering and why?**

*Please provide a detailed outline of the proposal. This information will support your findings in the impact assessments.*

Cardiff Council have partnered with Community Catalysts CIC to deliver a project which will create a pool of micro-enterprises delivering care and support in the community. Micro-enterprises are very small businesses, the vast majority will be sole traders although it is possible for micro-enterprises to be a limited company employing a maximum of 5 staff.

Micro-enterprises can provide a range of services, but the principle services for this project will be:

- Support to remain independent at home – cleaning, preparing meals, gardening.
- Companionship and support to access social groups and activities.
- Support with personal care needs (within Care Inspectorate Wales guidelines).

Micro-Enterprises can therefore support both council-funded and self-funded clients. This project will provide comprehensive advice on how to establish a sustainable micro-enterprise, ranging from training to self-employment advice to marketing.

Direct Payments have traditionally been used to employ Personal Assistants (PA), however this does bring with it additional complexity and responsibility for the service user as they are required to be the employer of the PA. This entails responsibilities such as identifying and interviewing the PA, issuing payslips, ensuring tax and national insurance is paid, providing a pension, ensuring appropriate insurance is in place and providing annual leave. Alongside this, there is also currently a PA shortage, with 68 adults in Cardiff currently awaiting a direct payment start date as they are unable to recruit a PA.

As micro-enterprises will be self-employed, the service user will not be required to be the employer, which will significantly simplify the direct payment process for service users. Alongside this, becoming a micro-enterprise will provide flexibility and promote an accessible form of entrepreneurship which isn't possible in a traditional care role. By addressing the complexities of direct payments and the current PA shortage this project will encourage the uptake of direct payments, providing care users with voice and control over their care in line with the Social Services and Well-being (Wales) Act 2014.

This project will not affect existing service users, this project is intended to instead increase direct payment uptake by encouraging new service users to receive them. Existing service users will have the option of using a micro-enterprise if it is suitable with their agreed care plan or using their own funds to top up their care with a micro-enterprise. However, the anticipated impact of this project, based on experiences in other local authorities will be the uptake in new service users.

A review of the direct payments support service has been completed; this review indicated that there are potential benefits to delivering more of the service in-house. (The current support service is provided by a third-sector organisation, Dewis CIL). However, a

full options appraisal is being completed before a decision is finalised. Another EIA will be completed, and stakeholders consulted once the options appraisal has been finalised.

**What are the costs and/or savings?**

*What will the proposal cost and how will it be funded?*

*How might costs be reduced through involvement and collaboration, across Cardiff Council and/or with external stakeholders?*

*Are there savings and how will these be realised?*

This project is funded until March 2025 by UK government Shared Prosperity Funding. There is the potential for cost savings as this project will assist to encourage the take-up of direct payments for lower-level care needs. For each client that uses the services of a micro-enterprise rather than a domiciliary care agency a minimum saving of £6.04 is made per hour.

### 3. Impact Assessments

#### Which impact assessments do you need to complete to support your proposal?

Further information is included about each assessment at the start of the relevant section.

The [Impact Assessment Screening Tool](#) provides advice tailored to your proposed policy, strategy or project regarding which impact assessments may be required and who to contact to find out more.

The screening tool is an online form with mainly multiple-choice questions which should take less than 10 minutes to complete.

Once the answers have been submitted, an automated email will be sent to you with the recommended next steps and details of who to contact for expert advice.

**Put Yes or No next to each of the impact assessments listed below to indicate which ones are being carried out. For assessments which are not being carried out, please delete the relevant sections on the subsequent pages.**

Impact Assessment	Completed: Y/N
A. Equality Impact Assessment	Y
B. Child Rights Impact Assessment	N
C. Welsh Language Impact Assessment	Y
D. Habitats Regulations Assessment	N
E. Strategic Environmental Assessment	N
F. Data Protection Impact Assessment	Y
G. Health Impact Assessment	N

For further information on all the above impact assessments including who to contact for advice, please visit the [Policy Portal](#).

# A: Equality Impact Assessment

Guidance in completing this assessment can be accessed [here](#). Please consult the Equality Team for any further assistance with completing this assessment [EqualityTeam@cardiff.gov.uk](mailto:EqualityTeam@cardiff.gov.uk)

Under the Equality Act 2010, “differential impact” means that people of a particular protected characteristic (e.g. people of a particular age) will be significantly more affected by the change than other groups.

## Impact on the Protected Characteristics

### Age

Will this proposal have a **differential impact [positive/negative]** on different age groups?

	Yes	No	N/A
Up to 18 years	Y		
18 - 65 years	Y		
Over 65 years	Y		

### Please give details/consequences of the differential impact, and provide supporting evidence, if any.

This project was established to focus on providing care to adults on the one hand, and on the other to support adults to become a micro-enterprise. Demographics obtained from other local authorities indicate that those who receive care from MEs tend to be over 65 years, and older women close to retirement are a key proportion of those who decide to re-train as a ME.

However, as a micro-enterprise is an independent business, it can provide care and support to any client (within Care Inspectorate Wales Guidelines), therefore it is possible that they provide care and support to individuals under 18 years old. This would not be a key aim of the project however.

### What action(s) can you take to address the differential impact?

Demographic monitoring of both those who train to become a micro-enterprise and the clients who receive care. It is anticipated that this will be a positive differential impact as it will provide more autonomy for the client.

### Disability

Will this proposal have a **differential impact [positive/negative]** on disabled people?

	Yes	No	N/A
Hearing Impairment	Y		
Learning Disability	Y		
Long-Standing Illness or Health Condition	Y		
Mental Health	Y		
Neurodiversity	Y		
Physical Impairment	Y		

Substance Misuse	Y		
Visual Impairment	Y		
Other	Y		

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

The aim of this project is to provide those with a lower care need (likely to fall into one of the categories above) with increased voice and control over their care, without having to go through the standard commissioning route. Additionally, a report published by the University of Birmingham indicated that micro-enterprises are significantly more likely to be run by disabled people for disabled people than any traditional domiciliary care provider.

**What action(s) can you take to address the differential impact?**

It is anticipated to be a positive impact as it will provide increased autonomy for disabled people, but demographic monitoring will take place to ensure this.

### Gender Reassignment

Will this proposal have a **differential impact [positive/negative]** on transgender people?

	Yes	No	N/A
Transgender People (Transgender people are people whose gender identity or gender expression is different from the gender they were assigned at birth.)	Y		

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

One of the key aims of this project is to provide more voice and control for those with lower care needs, which will allow for greater personalisation and flexibility for clients in selecting who provides care. This will enable clients to potentially select carers of a similar background. People who are transgender may have negative experiences of traditional care, and this project may enable them to receive care from someone with a similar background. According to a survey conducted by Stonewall, 7 out of 10 transgender people report being impacted by transphobia when accessing health services. There are a few micro-enterprises run by transgender people in Wales. These were developed by similar projects in other local authorities.

**What action(s) can you take to address the differential impact?**

It is anticipated to be a positive impact but demographic monitoring will occur.

### Marriage and Civil Partnership

Will this proposal have a **differential impact [positive/negative]** on marriage and civil partnership?

	Yes	No	N/A
Marriage			Y
Civil Partnership			Y

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

There is no evidence to suggest a differential impact on this group.

**What action(s) can you take to address the differential impact?**

No impact identified, no action necessary.

### Pregnancy and Maternity

Will this proposal have a **differential impact [positive/negative]** on pregnancy and maternity?

	Yes	No	N/A
Pregnancy			Y
Maternity			Y

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

There is no evidence to suggest a differential impact on this group.

**What action(s) can you take to address the differential impact?**

No impact identified, no action necessary.

### Race

Will this proposal have a **differential impact [positive/negative]** on the following groups?

	Yes	No	N/A
White			Y
Mixed / Multiple Ethnic Groups	Y		
Asian / Asian British	Y		
Black / African / Caribbean / Black British	Y		
Other Ethnic Groups	Y		

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**



27% of current direct payment recipients in Cardiff are of a BAME background, which is higher than the current % BAME population, indicating that direct payments are viewed favourably. This project, by significantly simplifying the direct payment process, is anticipated to lead to a further increase of direct payments amongst Cardiff's BAME community.

**What action(s) can you take to address the differential impact?**

It is expected to be a positive impact as it will provide increased opportunities for autonomy and flexibility in choice of care provider.

**Religion, Belief or Non-Belief**

Will this proposal have a **differential impact [positive/negative]** on people with different religions, beliefs or non-beliefs?

	Yes	No	N/A
Buddhist	Y		
Christian	Y		
Hindu	Y		
Humanist	Y		
Jewish	Y		
Muslim	Y		
Sikh	Y		
Other belief	Y		
No belief	Y		

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

By encouraging the uptake of direct payments, this project will provide service users with greater voice and control over their care, allowing service users to potentially receive care from those of a similar religious background. Work is currently being undertaken on religiously sensitive care (for example, awareness of prayer times) and community outreach with local faith groups will be held.

**What action(s) can you take to address the differential impact?**

It is anticipated to be a positive impact, but community outreach with faith groups will allow us to monitor that impact.

**Sex**

Will this proposal have a **differential impact [positive/negative]** on male, female or non-binary persons?

	Yes	No	N/A
Male persons	Y		
Female persons	Y		
Non-binary persons	Y		

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

The greater personalisation and flexibility that micro-enterprises provide will enable service users to receive care from members of their own gender if so desired.

**What action(s) can you take to address the differential impact?**

Demographic monitoring of both those who become micro-enterprises and those who receive care from micro-enterprises will be completed.

### Sexual Orientation

Will this proposal have a **differential impact [positive/negative]** on people with different sexual orientations?

	Yes	No	N/A
Bi	Y		
Gay	Y		
Lesbian	Y		
Heterosexual			Y
Other	Y		

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

The greater personalisation and flexibility that using micro-enterprises provides, as opposed to traditional domiciliary care, will enable service users to receive care from people of the same sexual orientation if desired. According to a survey by Stonewall, 23% of LGBT+ have witnessed discriminatory or negative remarks about LGBT+ people in a social care setting.

**What action(s) can you take to address the differential impact?**

It is anticipated to be a positive impact but engagement with local LGBT+ community groups and demographic monitoring will ensure it is having a positive impact.

### Socio-economic Duty

Is the change anticipated to reduce or contribute to inequality of outcome as a result of socio-economic disadvantage? (e.g. will the change negatively impact on those on low-incomes or those living in deprived areas?)

	Yes	No	N/A
Socio-economic impact	Y		

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

This project will encourage an accessible form of entrepreneurship. The vast majority of micro-enterprises will be sole traders, and evidence from other local authorities

suggests that micro-enterprises both attract new candidates to the care workforce and encourage retention amongst the existing workforce.

**What action(s) can you take to address the differential impact?**

Employment status monitoring will occur.

**Welsh Language**

Will this proposal have a **differential impact [positive/negative]** on the Welsh language?

	Yes	No	N/A
Welsh language	Y		

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

Currently, for service users who wish to receive their care through the medium of Welsh this would usually be delivered through the larger domiciliary care agencies. Direct payment service users can face delays in finding Welsh-speaking personal assistants. The increased flexibility and personalisation provided by micro-enterprises will make it easier for those with lower-level care needs to receive care through the medium of Welsh via direct payment and not through the larger agencies (who are more appropriate for higher-level care packages).

**What action(s) can you take to address the differential impact?**

It is expected to be a positive impact although demographic monitoring will confirm that.

**Consultation and Engagement**

What arrangements have been made to consult/engage with equality/ community organisations, especially those who are representative of those you have identified as being likely to be affected?

It is not expected that this new project will interfere with existing service delivery – although service users may decide to use micro-enterprises to supplement their care. Engagement events will be held for existing direct payment service users to encourage creativity with direct payments & micro-enterprises, i.e pooled direct payments.

A comprehensive engagement plan will be drafted to engage with the groups above who are impacted, including regular community forums linking service users with micro-enterprises.

As part of the options appraisal on the future of the direct payment support service engagement with existing direct payments service users will be held, and will form a crucial role in final decision making.

### Summary of Actions (Listed in the sections above)

	<b>Actions</b>
Age	Demographic monitoring
Disability	Demographic monitoring & community engagement
Gender Reassignment	Demographic monitoring & community engagement
Marriage & Civil Partnership	N/A
Pregnancy & Maternity	N/A
Race	Demographic monitoring & community outreach
Religion/Belief	Demographic monitoring & analysis of faith sensitive care
Sex	Demographic monitoring
Sexual Orientation	Demographic monitoring & community outreach.
Socio-economic Impact	Monitoring of jobs created
Welsh Language	Demographic monitoring
Generic/ Over-Arching (applicable to all the above groups)	Community engagement & outreach with all impacted groups listed above.

### Next Steps

Any recommendations for action that you plan to take as a result of this Equality Impact Assessment (listed in Summary of Actions) should be included as part of your Service Area's Business Plan to be monitored on a regular basis.

Where the Equality Impact Assessment shows negative impacts, you must append the form to the Cabinet or Officer Decision Report.

On completion of this Assessment, please ensure that the whole form is submitted to the Equality Team mailbox so that there is a record of all assessments undertaken in the Council [EqualityTeam@cardiff.gov.uk](mailto:EqualityTeam@cardiff.gov.uk)

## **B: Child Rights Impact Assessment**

The aim of a Child Rights Impact Assessment is to put children and young people at the forefront of decision-making. The assessment helps officers to consider how the rights of children and young people may be affected by a proposed policy or project.

Click [here](#) to start a Child Rights Impact Assessment.

You will receive an automated email containing a link to your Child Rights Impact Assessment template and the Child Friendly Cardiff Team will be in contact to support you.

Guidance for Local Government prepared by Unicef is available here:  
[Child Rights Impact Assessment - Child Friendly Cities & Communities \(unicef.org.uk\)](https://www.unicef.org.uk/child-rights-impact-assessment-child-friendly-cities-communities)

For further information or assistance in completing the Child Rights Impact Assessment, please contact the Child Friendly Cardiff Team [ChildFriendlyCardiff@cardiff.gov.uk](mailto:ChildFriendlyCardiff@cardiff.gov.uk)

### **Next Steps**

Where it is considered that a Child Rights Impact Assessment is required, you must append the form to the Cabinet or Officer Decision Report.

## C: Welsh Language Impact Assessment

Please consult with Bilingual Cardiff for any assistance with completing this assessment  
[Bilingualcardiff@cardiff.gov.uk](mailto:Bilingualcardiff@cardiff.gov.uk)

### Welsh Language Standards 88-97

#### Standard 88

Will this proposal have a **differential impact [positive/negative]** on:

	Yes	No	N/A
The opportunities for persons to use the Welsh language?	Y		
Treating the Welsh language no less favourably than the English language?		Y	

**Please give details/ consequences of the differential impact, and provide supporting evidence, if any.**

The aim of this project is to increase voice and control for service users in how they receive care. A key aim alongside this is to provide service users with language and cultural choice in their care. Welsh speakers who have lower-level care needs will be able to purchase services from a Welsh speaking micro-enterprise.

#### Standard 89

Could this proposal be formulated or re-formulated, so that it would have positive effects, or increased positive effects, on:

**The opportunities for persons to use the Welsh language?**

All communications relating to the project will be bilingual, alongside any forms/letters/applications completed during the lifespan of the project. Welsh speaking staff are involved in the project to ensure that face to face services can also be delivered in Welsh.

**Treating the Welsh language no less favourably than the English language?**

N/A

#### Standard 90

Could this proposal be formulated or re-formulated to ensure that it does not have adverse effects, or a decreased adverse effect, on:

**The opportunities for persons to use the Welsh language?**

As above

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<b>Treating the Welsh language no less favourably than the English language?</b>
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N/A
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**Standard 91**

When consulting on the proposal, were views considered, and sought, on the effects (both positive and negative) that it would have on:

<b>The opportunities for persons to use the Welsh language?</b>
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When procuring the contract with Community Catalysts CIC, this was included in the mini-competition, to ensure that the project adheres to the Council's bilingual requirement.
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<b>Treating the Welsh language no less favourably than the English language?</b>
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**Standard 92**

Did the consultation seek and give consideration to views on how the proposal could have positive, or increased positive effects, on:

<b>The opportunities for persons to use the Welsh language?</b>
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As above
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<b>Treating the Welsh language no less favourably than the English language?</b>
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**Standard 93**

Did the consultation seek and give consideration to views on how the proposal could have no adverse effects, or decreased adverse effects, on:

<b>The opportunities for persons to use the Welsh language?</b>
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As above
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<b>Treating the Welsh language no less favourably than the English language?</b>

**Standard 94**

If the proposal includes the awarding of grants, has consideration been given to the guidance presented in Cardiff Council's Policy on Awarding Grants in Compliance with the Welsh Language Standards with regard to:

<b>The opportunities for persons to use the Welsh language?</b>
N/A

<b>Treating the Welsh language no less favourably than the English language?</b>

**Standard 95**

If research was undertaken or commissioned to assist with the development of the proposal, did it give consideration to whether it would have a **differential impact [positive/negative]** on:

<b>The opportunities for persons to use the Welsh language?</b>
Yes – in discussions with other local authorities who have similar projects, it was raised that micro-enterprises can provide opportunities for people to receive care through the medium of Welsh, which is not always possible through a traditional care provider.

<b>Treating the Welsh language no less favourably than the English language?</b>

**Standard 96**

Did the research undertaken or commissioned to assist with the development of the proposal give consideration to how it could have a positive effect, or increased positive effects, on:



<b>The opportunities for persons to use the Welsh language?</b>
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As above
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<b>Treating the Welsh language no less favourably than the English language?</b>
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### Standard 97

Did the research undertaken or commissioned to assist with the development of the proposal give consideration to how it could have no adverse effect, or decreased adverse effects, on:

<b>The opportunities for persons to use the Welsh language?</b>
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As above
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<b>Treating the Welsh language no less favourably than the English language?</b>
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### Material and Services

In addition to the impact assessment to ensure that the proposal meets the requirements of the Welsh Language Standards, consideration must also be given to the supporting materials and services that may be required.

These include (please click on the hyperlinks to view detailed information about the requirements under the Welsh Language Standards):

- [Correspondence](#) - receiving and replying (emails, letters, online communication).
- [Telephone](#) – receiving and answering calls.
- [Meetings & Public Events](#) – public meetings or events, group meetings, consultation, individual meetings.
- [Public Messages – electronic – video](#)
- [Signs, Notices & Display Material](#)
- [Publicity & Advertising](#)
- [Producing Public Documents](#) - policies, strategies, annual reports, corporate plans, guidelines, notices, codes of practice, consultation papers, licences, certificates, rules, brochures, leaflets, pamphlets or cards, ticket/vouchers.
- [Producing Forms](#)
- [Reception Services](#)
- [Websites, Apps and Online Services](#)
- [Social Media](#)
- [Self Service Machines](#)

- [Education Training Courses](#)
- [Public Address Announcements](#)

<b>Are all supporting materials and services compliant with the requirements of the Welsh language standards?</b>
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Yes
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### **Cardiff Council's Welsh Language Skills Strategy**

This strategy may be viewed here and additional guidance documents have been produced to support its implementation:

- [Assessing Welsh Language Skills and Identifying Welsh Essential Roles](#)
- [Recruitment, Selection, and Interview Procedures and the Welsh Language](#)

<b>Do you have access to sufficient Welsh speaking staff to support the delivery of the proposal in compliance with the requirements of the Welsh language standards?</b>
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Yes
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### **Next Steps**

Where it is considered that a Welsh Language Impact Assessment is required, you must append the form to the Cabinet or Officer Decision Report.

A copy must also be emailed to Bilingual Cardiff [Bilingualcardiff@cardiff.gov.uk](mailto:Bilingualcardiff@cardiff.gov.uk)

## D: Habitats Regulations Assessment

	Yes	No
Will the proposal affect a European site designated for its nature conservation interest*, or steer development towards an area that includes a European site, or indirectly affect a European site?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

*\* Only two European sites designated for nature conservation interest lie within Cardiff's boundaries – the Severn Estuary and Cardiff Beech Woods, but be aware if your project affects an area close to a neighbouring authority.*

If the answer is 'Yes', then a screening exercise may need to be conducted to determine if a Habitats Regulations Assessment is required or not.

Contact the [Biodiversity Team](#) who will guide you through the process.

## E: Strategic Environmental Assessment

	Yes	No
Does the strategy, policy or activity set the framework for future development consent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Yes	No
Is the strategy, policy or activity likely to have significant environmental effects (positive or negative)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

If you have answered 'Yes' to both of the above questions, then a full Strategic Environmental Assessment Screening is needed.

Contact the [Sustainable Development Unit](#) who will guide you through the process.

## F: Data Protection Impact Assessment

	Yes	No
Will the proposal involve processing information that could be used to identify individuals?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

If the answer is 'Yes', then a Data Protection Impact Assessment may be required.

Click [here](#) to read the guidance and start the Data Protection Impact Assessment process if needed.

For further information, contact the [Data Protection Service](#).

## G: Health Impact Assessment

A Health Impact Assessment helps to develop policies and projects that consider the mental, physical and social health and well-being of a population during planning and development. Considering health inequalities and their impacts on local communities is an essential part of any Health Impact Assessment.

Health Impact Assessments will become a statutory requirement for public bodies in specific circumstances in the future. These circumstances have yet to be published by Welsh Government.

For further information and advice, please contact the Wales HIA Support Unit.

Website: [Home - Wales Health Impact Assessment Support Unit \(phwwhocc.co.uk\)](http://phwwhocc.co.uk)

Email: [WHIASU.PublicHealthWales@wales.nhs.uk](mailto:WHIASU.PublicHealthWales@wales.nhs.uk)