

Cyngor Sir Powys County Council

Single Integrated Impact Assessment (SIIA)

The integrated approach to support effective decision making



The **Single, Integrated, Impact Assessment (SIIA)** toolkit incorporating Welsh Language, Equalities, Well Being of Future Generations Act, Sustainable Development Principles, Communication and Engagement, Safeguarding, Corporate Parenting, Community Cohesion and Risk Management supporting effective decision making and ensuring compliance with respective legislation.

There are a number of pieces of legislation that Powys County Council is subject to, which require us to carefully consider how we make decisions:

Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011

This specifies that the Council must have due regard to:

- **Eliminate** discrimination, harassment and victimisation
- **Advance** equality of opportunity between people who share a relevant protected characteristic and those who do not;
- **Foster** good relations between people who share a protected characteristic and those who do not.

And must:

- Remove or minimise disadvantages experienced by people due to their protected characteristics
- Take steps to meet the needs of people from protected groups.
- Encourage people with protected characteristics to participate in public life or in other activities where their participation is disproportionately low.

The Act describes fostering good relations as tackling prejudice and promoting understanding between people who share a protected characteristic and those who do not. Meeting the duty may involve treating some people more favourably than others, as long as this does not contravene other provisions within the Act.

Wellbeing of Future Generations (Wales) Act 2015

The Wellbeing of Future Generations Act will from April 2016 require all public bodies to demonstrate that they - 3rd person used elsewhere are improving social, economic, environmental and cultural wellbeing, whilst also looking to the future, planning for the long term and ensuring that we don't compromise the ability of future generations to be able to do the same. This is called sustainable development.

The Act sets out 7 Wellbeing Goals:

- **A Prosperous Wales**
- **A Resilient Wales**
- **A Healthier Wales**
- **A More Equal Wales**
- **A Wales of Cohesive Communities**
- **A Wales of Vibrant Culture and Thriving Welsh Language**
- **A Globally Responsible Wales**

We have to demonstrate how we are contributing to all of these goals and following the 5 **Sustainable Development principles**:
Long term, Integration, Collaboration, Involvement and Prevention

Welsh Language (Wales) Measure 2011

- Gives the Welsh language **official status** in Wales
- Establishes the principle that the Welsh language should be treated **no less favourably** than the English language
- Requires public authorities to **comply with standards** relating to Welsh language provision

The Policy Making Standards relate to assessing the impact of policies and decisions on opportunities for persons to use the Welsh language, and on treating the Welsh language no less favourably than the English language. The Council must therefore consider the Welsh Language when we are developing policies and strategies or when considering new ways of providing services.

Integrated Risk Assessment (Legislative Frameworks) - Whilst there is no formal legislation which stipulates that we must formally manage our risks, it is good practice to undertake risk management. This is a process that aims to help assess, evaluate and take action on risks, with a view to increasing the probability of success and reducing the likelihood of failure to ensure that 'business as usual' is maintained. Risk management should be regularly monitored to ensure control of our identified risks where required. The outputs from effective risk management include compliance, assurance and **enhanced decision making**. These outputs provide benefits by way of improvements in the efficiency of our operations, successful delivery of our change projects and the efficacy of our corporate objectives.

Risk management should be a continuous process that supports the development and implementation of our corporate planning and budget setting processes. Plans typically focus on a desired future, which is underpinned by a set of reasonable assumptions. However, each of these assumptions carries a level of uncertainty and risk. Using identified risks in both the corporate planning and budget setting processes will ensure that we make informed decisions based on the current level of risk, and are fully aware of how the risks could either have a negative impact on our ability to deliver our objectives, or how we can exploit opportunities and take advantage of these. Achieving our targeted performance is dependent upon the ability to manage our risks. As we move towards becoming a commissioning council we need to become more intelligent about the risks which we take in order that we can sustain our services with a continually reducing budget. Equally important, we must be aware of the risks in order to ensure we protect our customers, reputation and financial stability.

The implementation of suitable risk responses should also form part of our corporate planning process, to provide appropriate mitigating controls to our risks based upon the impact and probability identified in the risk assessment process. Risk Management is high on the agenda of Cabinet and Management Team who view the **Risk Register** on a quarterly basis, along with Audit Committee and

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Service Area	Housing	Head of Service	Simon Inkson	Strategic Director	Amanda Lewis
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Policy / Change Objective / Budget Saving	Council Housing Tenancy Management Policy
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Outline Summary
 Powys County Council Housing Service manages 5,400 Council homes. The updated Tenancy Management Policy describes how we create, change and end tenancy agreements. The policy follows current legislation. The policy should enable tenants to exercise their rights as introductory and secure tenants. It should provide Housing Staff with a reference on which they can base their decisions.

1. SIIA Version Control (services should consider the impact assessment early in the development process and continually evaluate)

Version	Author	Job Title	Date
1	Henk Jan Kuipers	Housing Service Improvement Officer	17-03-2016
2	Henk Jan Kuipers	Housing Service Improvement Officer	08-04-2016
3	Henk Jan Kuipers	Housing Service Improvement Officer	21-04-2016
4	Henk Jan Kuipers	Housing Service Improvement Officer	13-05-2016

2. How does your policy / change objective / budget saving impact on the council's strategic vision?

Council Priority	How does the policy / change objective impact on this priority?	Inherent Judgement (I; U; P; N; F; G; E)	What will be done to better contribute to positive or mitigate any negative impacts?	Source of Outline Evidence to support judgement	Residual Judgement (I; U; P; N; F; G; E)
Supporting people in the community to live fulfilled lives	Providing tenants with secure tenancies after the introductory 12 months, gives security that is often not available in the private rented sector. Many Council tenants are older. By renting tenants are not responsible for maintenance of the building.	Excellent	Look into options to include services as part of the tenancy or in addition to the tenancy, specific for older and/or vulnerable people.	2000 Council bungalows and flats are designated for rent for older people. figures	Excellent
Developing the economy	No impact	Neutral	-	-	Neutral

<p>Improving learner outcomes for all, minimising disadvantage</p>	<p>Providing tenants with secure tenancies after the introductory 12 months, gives security that is often not available in the private rented sector. Low income households with children might find security in Council housing they can't find elsewhere in the housing market. As additional service we have started to provide computer training.</p>	<p>Good</p>	<p>Look into options to include services as part of the tenancy or in addition to the tenancy: IT related services like broadband access.</p>	<p>Low income households with children in Council Housing is not recorded.</p>	<p>Good</p>
<p>Remodelling council services to respond to reduced funding</p>	<p>No impact</p>	<p>Neutral</p>	<p>Managing tenancies are important moments to build a relationship with tenants. Often there are significant changes going on in the lives of the tenants that create the need to move or to change a tenancy. The Housing Service does refer people and provide support through supported housing and Income and Awards. We could evaluate how we assess potential needs of tenants when their circumstances change, e.g. promoting third sector (voluntary) organisations.</p>	<p>-</p>	<p>Fair?</p>

3. How does your policy / change objective / budget saving impact on the Welsh Government's well-being goals?

Well-being Goal	How does the policy / change objective contribute this goal?	Inherent Judgement (I; U; P; N; F; G; E)	What will be done to better contribute to positive or mitigate any negative impacts?	Source of Outline Evidence to support judgement	Residual Judgement (I; U; P; N; F; G; E)
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<p>A prosperous Wales: Efficient use of resources, skilled, educated people, generates wealth, provides jobs.</p>	<p>Secure tenancies give people that have income from employment security about accommodation. This is a significant indirect contribution.</p>	<p>Fair</p>	<p>-</p>	<p>The 2011 Census recorded that 44% of Council tenant households was economically active, vs 64% of all tenures. There is a higher level of retired households (38% HRA vs 30% Powys) Higher level of long term sick or disabled (11% vs 3%). Higher unemployment 5%vs 2%.</p>	<p>Fair</p>
<p>A resilient Wales: Maintain and enhance biodiversity and ecosystems that support resilience and can adapt to change (e.g. climate change).</p>	<p>No impact</p>	<p>Neutral</p>	<p>It might be considered to look at the way we communicate energy efficiency at the start of a tenancy.</p>	<p>-</p>	<p>Fair?</p>
<p>A healthier Wales: People's physical and mental well-being is maximised and health impacts are understood.</p>	<p>No impact</p>	<p>Neutral</p>	<p>We could evaluate how we assess potential health needs of tenants when their circumstances change. When offering a property to a tenant it could be assessed if the property is likely to be suitable in 5 year time; e.g. an Occupational Therapist could assess</p>	<p>Census 2011: higher level of long term sick or disabled in HRA than all tenures; 11% vs 3%. In 2015/2016 the Council has adapted 172 Council properties to meet the specific needs of tenants.</p>	<p>Fair</p>
<p>A Wales of cohesive communities: Communities are attractive, viable, safe and well connected.</p>	<p>No impact</p>	<p>Neutral</p>	<p>We could evaluate how we promote community cohesion at the start of tenancies. E.g. with help of the engagement officers.</p>	<p>-</p>	<p>Fair?</p>

<p>A globally responsible Wales: Taking account of impact on global well-being when considering local social, economic and environmental well-being.</p>	<p>No impact</p>	<p>Neutral</p>	<p>We could look into providing digital information services, instead of hard copy letters etc to reduce paper use and improving accessibility for tenants. Make the tenancy dossier available to the tenant on line.</p>	<p>-</p>	<p>Fair?</p>
<p>A Wales of vibrant culture and thriving Welsh language: Culture, heritage and Welsh language are promoted and protected.</p>	<p>No impact</p>	<p>Neutral</p>	<p>See below</p>	<p>2% of Council tenants indicate their preferred language is Welsh (note 49% preference recorded). Census 2011 Powys: 72% no Welsh skills 19% can speak Welsh 14% can speak, read and write Welsh. It is unknown why a relatively small percentage in Council Housing prefers the use of Welsh.</p> <p>The Census 2011 indicates that ability to use Welsh is no different in Council Housing compared with other tenures.</p>	<p>Fair?</p>
<p><i>Opportunities for persons to use the Welsh language</i></p>	<p>No impact</p>	<p>Neutral</p>	<p>Make all documentation including tenancy agreements available in Welsh and English. Evaluate how we record language preferences when interacting with tenants. Encourage the use of preferred language at the start of the tenancy.</p>	<p>-</p>	<p>Fair</p>

<i>Treating the Welsh language no less favourable favourably than the English language</i>	No impact	Poor	This is more practice than the policy itself. Currently we do not provide Welsh tenancy agreements and our default is to communicate in English, unless the member of staff is a Welsh speaker. The language standard together with changing attitudes will bring change to this.	-	Good
<i>Opportunities to promote the Welsh language</i>	No impact	Neutral	-	-	Neutral
<i>Welsh Language impact on staff</i>	No impact	Neutral	Ensure there are sufficient staff to provide services through Welsh, but this is not part of this policy.	-	Neutral
<i>People are encouraged to do sport, art and recreation.</i>	No impact	Neutral	We could evaluate how we promote sport, art and recreation at the start of tenancies.	-	Neutral?
A more equal Wales: People can fulfil their potential no matter what their background or circumstances.	The policy states clearly what we do in which situation, regardless of the 9 protected characteristics. The policy includes an equalities section, which aims to ensure all tenants are treated equally	Good	-	-	Good
<i>Age</i>	-	-	-	-	-
<i>Disability</i>	-	-	-	-	-
<i>Gender reassignment</i>	-	-	-	-	-
<i>Marriage or civil partnership</i>	-	-	-	-	-
<i>Race</i>	-	-	-	-	-
<i>Religion or belief</i>	-	-	-	-	-

Sex	-	-	-	-	-
Sexual Orientation	-	-	-	-	-
Pregnancy and Maternity	-	-	-	-	-
Equality Impact on PCC Staff	-	-	-	-	-

4. How does your policy / change objective / budget saving impact on the council's other key guiding principles?

Principle	How does the policy / change objective impact on this principle?	Inherent Judgement (I; U; P; N; F; G; E)	What will be done to better contribute to positive or mitigate any negative impacts?	Source of Outline Evidence to support judgement	Residual Judgement (I; U; P; N; F; G; E)
Sustainable Development					
Long Term: <i>Balancing short term need with long term and planning for the future.</i>	The current policy gives tenants the right to remain in their property and exercise their rights as tenants now and in the long term.	Excellent	-	-	Excellent
Collaboration: <i>Working together with other partners to deliver.</i>	The policy covers the administrative side of tenancy management.	Fair	As part of implementing the Renting Wales Act there might be an opportunity to look at the policy and procedures with other housing providers.	-	Fair
Involvement: <i>Involving those with an interest and seeking their views.</i>	This policy has been discussed with the policies sub-group from the Tenants' Liaison Forum and a staff working group. A public consultation has taken place involving TLF members and Housing Services Group 100.	Excellent	We'll be following up on feedback and experience from previous consultation and will use the feedback from this consultation to improve for the next time.	-	Excellent
Prevention: <i>Putting resources into preventing problems occurring or getting worse.</i>	The policy provides clarity about tenants' rights. This provides a consistent approach across Powys and avoids unnecessary discussions.	Excellent	Evaluate the way we ensure tenants understand their rights and obligations. This includes the tenants' handbook.	-	Excellent

<p>Integration: Positively impacting on people, economy and environment and trying to benefit all three.</p>	<p>There is an indirect effect: creating affordable, sustainable tenancies benefits people, which is good for the economy and environment.</p>	<p>Fair</p>	<p>-</p>	<p>-</p>	<p>Fair</p>
<p>Preventing Poverty: Prevention, including helping people into work and mitigating the impact of poverty.</p>	<p>Indirect: affordable tenancies and assessing eligibility for benefits/credits prior to signing tenancies.</p>	<p>Excellent</p>	<p>-</p>	<p>-</p>	<p>Excellent</p>
<p>Safeguarding: Preventing and responding to abuse and neglect of children, young people and adults with health and social care needs who can't protect themselves.</p>	<p>The policy includes a paragraph on dealing with joint tenancies and domestic abuse, as well as taking domestic abuse aspect into account when changing policies. The policy gives the discretion to respond to specific circumstances by tailoring enforcement to specific needs, especially where vulnerability of a tenant is an issue. The Housing Service will inform Social Services where vulnerable tenants, including children are under threat of losing the tenancy.</p>	<p>Good</p>	<p>Evaluate the referring process to Social Services and the follow up within SS. Raise staff awareness "Ask – Act".</p>	<p>In 2015 the Powys Community Safety Partnership recorded 829 incidents of domestic abuse reported to police. We don't know how many of these incidents took place in Council Housing. In 2015/2016 there were 35 households homeless or threatened with homelessness that involved domestic abuse. 7 of those households have been housed in Council Housing.</p>	<p>Excellent</p>
<p>Corporate Parenting: Enabling our looked after children to fulfil their potential.</p>	<p>In this policy the stepchild of a person is treated as his or her child and a former foster child aged over 18 will be treated as the legitimate child of the tenant. By providing secure tenancies this might help provide stability for families with looked after children.</p>	<p>Good</p>	<p>Evaluate if and how we could support families with looked after children. This does not directly relate to this policy Investigate the effect of the bedroom tax on the ability to retain foster carers within Powys?</p>	<p>On 31 March 2015 there were 136 looked after children in Powys, of which 116 in foster care. We don't know how many of those are housed in Council Housing.</p>	<p>Excellent</p>

5. What is the risk associated with this Policy / Change Objective / Budget Saving?

Description of risk	Impact (severity)	Probability (deliverability)	Inherent Risk
There is no known negative risk attached to implementing this policy. There is a small potential risk of different ways of working throughout Powys if the policy is not implemented, but there will be underlying legislation.	Medium	Low	Low
Does it have potential to impact on another service area?			
Income and awards – assessing housing benefit / universal credit Social services – referrals			

6. Is there additional evidence to support the Single Integrated Impact Assessment (SIIA)?

What additional evidence and data has informed the development of your proposal?
Public consultation responses are limited in numbers and indicate that the policy is easy or fairly easy to understand. Responses have resulted in a few changes in the policy to make it easier to understand, where respondents indicated they found it confusing or unclear. The consultation responses do not indicate anything is missing from the policy. The consultation responses have not highlighted any potential discrimination.

7. Policy / Change Objective Impact Assessment Summary and Judgement

Outline Assessment (to be inserted in cabinet report)	Cabinet Report Reference:
<p>The impact on Council priorities will be positive, particularly providing tenants, including vulnerable tenants, with long term security.</p> <p>The impact on Welsh Government well-being goals will be slightly positive.</p> <p>The impact on Welsh language is neutral, but if the Welsh language standard were to be followed this would be positive.</p> <p>The impact on equalities will be positive.</p> <p>The impact on the council's other key guiding principles will be positive.</p> <p>There are suggestions identified that have the potential to increase the positive impact of the policy. This will be mainly done by reviewing ways of working and implementing procedures, not by changing the policy itself. These potential improvements will be taken into consideration when developing the next Service Improvement Plan or part of continuous improvement.</p> <p>The overall risk associated with this policy is low (1).</p>	
Judgement (to be included in Corporate or service risk register)	
Very High Risk	High Risk
	Medium Risk
	Low Risk
	X

8. Mitigating Actions

Action	Residual Risk
-	Low

9. On-going monitoring arrangements?

What arrangements will be put in place to monitor the impact over time?
Senior Management Team to take potential improvements listed under mitigation into consideration when developing next Service Improvement Plan or as part of continuous service improvement. Staff and Tenants Liaison Forum to monitor the effectiveness of the policy. Review scheduled after three years, but likely to take place when the Renting Wales Act is implemented – expected to be autumn 2017.

10. Sign Off

Position	Name	Signature	Date
Service Manager:	David Roffey		
Head of Service:	Simon Inkson		
Strategic Director:	Amanda Lewis		
Portfolio Holder:	Cllr Barry Thomas		