

Supporting Good Decisions

Promoting Equality & Human Rights, Reducing Inequality and Protecting the Environment

Integrated Impact Assessment Form



Integrated Impact Assessment Form
Promoting Equality, Human Rights and Sustainability

Title of Policy/ Proposal	Contract for Advice Services 2020 - 2023
Timescale for Implementation	April 2020 – March 2023 with option for 1 or 2 year extension
IIA Completion Date	Pre tender, 6 th September 2019 Reviewed and revised post tender, 21 st February 2020
Completed by	Paolo Vestri
Lead officer	Paolo Vestri

Section 1: Screening

1.1 Briefly describe the policy/proposal/activity you are assessing. (Set out a clear understanding of the purpose of the policy/ proposal/ activity being developed or reviewed (e.g. objectives, aims) including the context within which it will operate.)

The strategic aim of this service specification is: ‘To provide free, impartial, confidential benefits, debt, housing and general advice and information to all residents of East Lothian. Services shall be delivered in a readily accessible manner (by telephone, face to face, digitally through web chat etc) to everyone in East Lothian who needs them, and shall ensure that services are accessible to those people most in need. ‘

Key Objectives

To meet the advice and information needs of those who require services through a range of appropriate modernised service delivery mechanisms that:

- provide consistent, high quality and accurate advice that is accessible to those most in need
- promote the maximisation of income, increase financial inclusion and prevent or alleviate individual poverty
- work in partnership with other providers of these services and other services that are of benefit to the target population (e.g. East Lothian Council, food banks, employability services, consumer advice).

To deliver the services in a manner that maximises available resource, to ensure that services are:

- cost effective
- available and accessible to people most in need, in or at risk of poverty, and in the areas targeted groups live in

- responsive and demand led
- accountable to East Lothian Council and to the public.

1.2 What will change as a result of this policy?

The contract replaces the existing contract for advice services, which ran from Jan 2016-Dec 2018, extended until 31st March 2020. The current provider, East Lothian Advice Consortium (partners, Haddington CAB and Musselburgh CAB) won the tender and are being awarded the new contract. This means that there will be a substantial level of continuity between the old and new service.

The providers of the service have significant experience of successfully providing a high quality advice services in East Lothian.

Changes in the specification include removal of various services that were specifically detailed in the old contract: a specialist housing advice component; specific mention of advice services for people with mental health problems; income maximisation (benefits advice) for carers; and, a financial capability component.

The new specification states that ‘The provider shall ensure that the service is delivered through a holistic and inclusive approach that will ensure all service users’ needs are explored and addressed.’

Also it includes an expectation of a multi-channel delivery of advice services. One of the key outcomes expected from the contract is: ‘Improving access to the services through the provision of appropriate accessible face-to-face, phone and digital services.’ The specification states: “The Provider will offer a variety of access channels, tailored to meet the needs of service users in an inclusive way (e.g. home visits will be provided to clients with additional vulnerability).”

1.3 Deciding if a full Impact Assessment is needed. Please answer the following questions:

	Yes	No
1. The policy/ proposal has consequences for or affects people e.g. how they can access a service?	YES	
2. The policy/proposal has potential to make a significant impact on equality?	YES	
3. The policy/proposal is likely to have a significant environmental impact?		No
4. The policy/ proposal has implications for the storage/ collection of personal data?	YES	

If you have answered yes question 1 and 2 above, please proceed to complete the Integrated Impact Assessment.

Section 2: Integrated Impact Assessment

2.1 Have those who are affected by the policy had the opportunity to comment on new proposals?

The advice services are available to the whole of the population of East Lothian. We have not undertaken any specific consultation on the contract and the proposed changes from the existing contract. However, we have taken the findings of the Poverty Commission, including evidence of people with lived experience of poverty into account, in developing the contract specification.

Although it is proposed to remove certain elements of service from the new contract the Council will put in place measures to ensure that the services required by vulnerable people are still available, principally through in-house council services, so they should not be adversely affected. The new specification states that 'The provider shall ensure that the service is delivered through a holistic and inclusive approach that will ensure all service users' needs are explored and addressed.' And also that, 'The provider will work closely with council services and other providers as required to ensure that those people most in need have access to the service.'

We have also evidence from annual reports from East Lothian Advice Consortium and Welfare Rights Service, including case studies and consulted East Lothian Advice Consortium (Haddington CAB and Musselburgh CAB) and relevant council services including the Revenues and Welfare Rights, Benefits, Community Housing and Adult Wellbeing services to provide their input into the new specification

2.2 What information/data have you used to inform the development of the policy to date?

The quarterly reports from the existing service provider, East Lothian Advice Consortium.

An independent review of the existing contract was carried out and the findings and evidence from the review were used to inform the development of the new contract. Data of deprivation levels from the Scottish Index of Multiple Deprivation, and information about possible demand for advice services from data such as Foodbank, Scottish Welfare Fund and Universal Credit was also used to inform the development of the specification, in particular, focussing the service on areas of multiple deprivation.

2.3 What does the evidence/ research suggest about the policy’s actual or likely impact on equality groups and those vulnerable/ or experiencing socio-economic disadvantage?

Evidence	Comment
Which groups are in in particular need of this service?	The advice services are available to the whole of the population of East Lothian but vulnerable people and in particular people in poverty, on benefits and/ or in debt.
What level of service uptake/ access is there from protected and vulnerable groups?	The current level of uptake of the existing service is well documented in the service providers’ (ELAC) quarterly and annual reports. In addition, the Council’s Welfare Rights Service provides some services to the protected and vulnerable groups and the uptake of these services is also documented.
Can you identify positive outcomes for service users	The positive outcomes of the existing service and new services are as detailed in the specification:
What is the service user experience of those from protected or vulnerable groups?	<ul style="list-style-type: none"> • reducing the number of households in East Lothian currently in debt, or at risk of being in debt • providing advice to help maximise income, and to enhance tenancy sustainment • improving access to the services through the provision of appropriate accessible face-to-face, phone and digital services.
What opportunity have those from protected groups had to co-produce or comment on the service/ plans?	<p>The outcomes in terms of Client Financial Gain and positive outcomes from debt arrangements are documented in quarterly and annual reports from ELAC and Welfare Rights Service and will be reported under the new contract by the new service provider.</p> <p>We have not consulted specifically with protected groups but have taken into account the evidence from, and findings of, the East Lothian Poverty Commission.</p>

2.4 How does the policy meet the different needs of groups in the community?

<p>Equality Groups</p> <ul style="list-style-type: none"> • Older people, people in the middle years 	<p>Services will be provided to all the equality groups.</p> <p>The provider will be expected to comply</p>

<ul style="list-style-type: none"> • Children and young people children • Women, men and transgender people (includes issues relating to pregnancy and maternity) • Disabled people (includes physical disability, learning disability, sensory impairment, long-term medical conditions, mental health problems) • Minority ethnic people (includes Gypsy/Travellers, migrant workers) • Refugees and asylum seekers • People with different religions or beliefs (includes people with no religion or belief) • Lesbian, gay, bisexual and heterosexual people • People who are unmarried, married or in a civil partnership 	<p>with the Equality Act 2010 and to undertake all its activities in a non-discriminatory manner and shall promote equality. (see section 2.6 below)</p> <p>In addition, the specification provides for positive action to meet the needs of certain groups such as older people and people with mobility issues through providing home visits to clients with additional vulnerability.</p> <p>The service will offer a variety of drop in opportunities and appointments tailored to meet the needs of service users in each location. Everyone approaching the service will be provided with advice, assistance and options for resolving their issue. Where this involves a referral to external specialist services, both formal and informal procedures will be adopted as appropriate to the client’s needs and wishes, including those with no recourse to public funds.</p> <p>The performance monitoring framework that is being put in place will include equalities monitoring which should identify any gaps in service provision for equality groups such as people whose first language is not English.</p> <p>Whilst the specification does not specifically list or detail the equality groups for whom the service will be provided it states that ‘The provider shall ensure that the service is delivered through a holistic and inclusive approach that will ensure all service users’ needs are explored and addressed.’ And also that, ‘The provider will work closely with council services</p>
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	<p>and other providers as required to ensure that those people most in need have access to the service.'</p>
<p>Those vulnerable to falling into poverty</p> <ul style="list-style-type: none"> • Unemployed • People on benefits • Lone Parents • Care experienced children and young people • Carers (including young carers) • Homeless people • Those involved in the community justice system • People with low literacy/numeracy • Families with 3 or more children • Those with a child/ children under 1 	<p>All these groups form the client base using the services provided through this contract.</p> <p>The Specification states that: "Everyone approaching the service will be listened to and treated with dignity and respect and provided with advice, assistance and options for resolving their issue, but the service will be targeted to those most at risk of poverty."</p> <p>The contract monitoring framework will include specific reference to the requirement for data on these client groups.</p>
<p>Geographical communities</p> <ul style="list-style-type: none"> • Rural/ semi rural communities • Urban Communities • Coastal communities • Those living in the most deprived communities (bottom 20% SIMD areas) 	<p>The service covers the whole of East Lothian.</p> <p>The specification states that outreach sessions will be held across East Lothian and home visits will be carried out if required to clients with additional vulnerability and areas of multiple deprivation.</p> <p>A telephone and web-based service will also be developed which should provide greater accessibility to the service for people who live in rural/ more remote communities.</p> <p>The method statement provided by the provider states: 'we are committed to</p>

	tailoring our services to support this tender by increasing the number of outreach clinics we currently deliver in the areas of greatest deprivation and will deliver CAB holistic advice, including Income Maximisation advice from clinics and from each of the two bureau sites in Musselburgh and Haddington.'
<p>Communication Needs:</p> <ul style="list-style-type: none"> • Gaelic Language Speakers • BSL users • English as a Second Language • Other e.g. DeafBlind, Plain English, Large Print 	<p>The specification does not specify the services that people with these communication needs will be provided with, but it does specify that: 'All the services detailed in this schedule will be provided through a holistic and inclusive approach that will ensure all clients' needs are explored and addressed.'</p> <p>In addition, the service provider will need to meet equalities duties (see 2.6 below).</p>

2.5 Are there any other factors which will affect the way this policy impacts on the community or staff groups?

Staff employed by the CABx and CoEL (the existing service providers) may be adversely affected by the new contract as the specification does not include certain elements that formed part of the existing contract.

No TUPE issues were identified for staff from other advice service providers.

Demand for the service across all East Lothian communities may increase due to the impact of welfare reform and projected population growth across the county.

The Council has been responding to the changes in welfare reform and has been developing an enhanced Financial Inclusion Service aligned to the Revenues and Welfare Rights Service. This includes developing an early intervention approach with Council tenants affected by Universal Credit.

The Scottish Government and DWP have provided funding for additional income maximisation and personal budgeting services provided through Citizens Advice Scotland

and CABx. Further enhancement of national services aligned to the introduction of the Scottish Social Security System are also being developed. For example, a new Financial Health Check service (The Money Talk Team) is being delivered by the Citizens Advice Network in Scotland; Health Boards have been provided with additional funding to support income maximisation through establishing or enhancing existing referral pathways; and, the creation of a new national welfare advice website is being explored.

2.6 Is any part of this policy/ service to be carried out wholly or partly by contractors? (If yes, how have you included equality and human rights considerations into the contract?)

The contract will be carried out by contractors sub-contracted to the East Lothian Advice Consortium – Haddington CAB and Musselburgh CAB. The contract includes the following clauses on equality and human rights considerations:

HUMAN RIGHTS

The Provider shall in its implementation of this Funding Contract comply with the requirements of the Human Rights Act 1998 (“the 1998 Act”) and all secondary legislation made under the 1998 Act as though the Provider were a Public Authority for the purposes of the 1998 Act. The Provider shall take all reasonable steps to ensure the observance of the condition contained in Clause 25.1 by all Staff employed by the Provider.

DISCRIMINATION

The Provider shall not unlawfully discriminate within the meaning and scope of the provisions of the Equality Act 2010 or any statutory modification or re-enactment thereof relating to discrimination in employment. The Provider shall take all reasonable steps to secure the observance of these provisions by all servants, employees or agents of the Provider and all sub-contractors employed in the execution of the Contract.

2.7 Have you considered how you will communicate information about this policy or policy change to those affected e.g. to those with hearing loss, speech impairment or English as a second language?

On appointment of the new contractor, they will be expected to provide information about the service to former, existing and potential new clients in appropriate formats and languages. The Council will also publicise the new service via its website, social media and services that work with vulnerable people or people who may require access to advice services. The contract specifies that: “The Provider will work closely with council services and other providers as required to ensure that those people most in need have access to the service.”

2.8 Please consider how your policy will impact on each of the following?

Equality and Human rights

- Promotes / advances equality of opportunity e.g. improves access to and quality of services
- Promotes good relations within and between people with protected characteristics and tackles harassment
- Promotes participation, is inclusive and gives people control over decisions which affect them
- Preserves dignity and self-respect of individuals (does not lead to degrading treatment or stigma)
- Builds support networks, resilience, community capacity

The new service specification aims to provide a 'single gateway' to advice for the full range of issues and problems that individuals and families may experience including, debt, bankruptcy, homelessness, unemployment and dealing with the complexities of the welfare system. Everyone approaching the service will be treated with dignity and respect and provided with the appropriate level of advice, assistance and options for resolving their issue.

The service will provide access to advice to anyone facing harassment or any other form of discrimination. In addition, welfare advice, money / debt advice provided will promote dignity and increase resilience and self-control over decisions.

Clients requiring advice or assistance with improving their health and lifestyles will be referred to the relevant agencies and support organisations.

The contract specifies that "Everyone approaching the service will be listened to and treated with dignity and respect and provided with advice, assistance and options for resolving their issue, but the service will be targeted to those most at risk of poverty."

Reduces Poverty

- Maximises income and/or reduces income inequality
- Helps young people into positive destinations
- Aids those returning to and those progressing within the labour market
- Improves employability skills, including literacy and numeracy
- Reduces the costs of taking part in activities and opportunities
- Reduces the cost of living

Welfare and money advice aims to maximise income and reduce income inequality.

Welfare and money advice provided to young people could assist them to reach positive destinations.

Welfare and money advice could assist people looking for jobs.

General advice will include advice on employment issues including equal pay.

Protecting the Environment:

- Reduces the need to travel or increases access to sustainable forms of transport
- Reduces greenhouse gas emissions
- Minimises waste and encourages resource efficiency
- Improves energy efficiency
- Protects natural environments

This contract will have little, if any, direct impact on greenhouse gas emissions, waste, energy efficiency or the natural environment. However, the contract includes an expectation of a multi-channel delivery of advice services. One of the key outcomes expected from the contract is 'Improving access to the services through the provision of appropriate accessible face-to-face, phone and digital services.' The more service users that use the phone or digital service rather than travelling to an office for a face-to-face service will reduce travel. We expect that face-to-face services (including 'surgeries' will be in accessible venues that are on or close to public transport routes.

Section 3.Action Plan

The assessment has not resulted in any substantive amendments to the proposed contract. Mitigation against possible negative impacts of the new contract have already been taken into account in the development of the new contract. This includes developing the Council's Financial Inclusion Service and housing advice for homeless and other people through the Community Housing service. The two services will also support the provision of financial capability lessons in schools. Income maximisation advice for carers will be incorporated into the Contract for Carers support that is being developed by the Health & Social Care Partnership.

The specification states that: 'The Provider will work closely with council services and other providers as required to ensure that those people most in need have access to the service.'

In addition, the Council and service provider will collaborate to ensure that East Lothian residents have access to the new national digital and phone welfare and money advice services that are being rolled out with funding from the Scottish Government to.

The specification includes a section on monitoring and evaluation which states: 'The provider and council will monitor the provider's services with a view to consistently improving the quality and effectiveness of the service (both in terms of cost, outputs and outcomes).' It then sets out the quarterly and annual data which the provider will supply in order to facilitate this monitoring and evaluation.

In addition to this provision the council will monitor the services it is providing through the Revenues and Welfare Rights Service along with the services provided through this contract to ensure that vulnerable people have access to the full range of advice services.

The Financial Inclusion Network, supported by STRIVE, East Lothian's Third Sector Interface provides a new opportunity for collaborative working across both public and third sectors.

What, if any changes will be made to the proposal/ policy as a result of the assessment?

None

For consideration of the Head of Service

Can you identify any cumulative impacts on equality groups or vulnerable people arising from this policy, when considered alongside other changes across other services?

No

Sign off by Head of Service

Name Sharon M Saunders

Date 26 02 2020