

Service and Community Impact Assessment (SCIA)

Front Sheet:

Directorate and Service Area:

People's Directorate - Adult Services

What is being assessed (eg name of policy, procedure, project, service or proposed service change):

The outcome of the annual review process for Target Banding Rates paid to care homes and its impact on the care homes market in Oxfordshire.

Responsible owner / senior officer:

Benedict Leigh
(Deputy Director - Joint Commissioning)

Date of assessment: 11th September 2017

Summary of judgement:

It is felt that there will be limited impact from the recommended outcome due to the way that the current care home market is performing and the new service developments that are planned or are taking place.

Detail of Assessment:

Purpose of assessment:

This assessment has been carried out

- To consider the impact of for care homes following the council's annual review of its Target Banding Rates for 2017/18
- To comply with the Council's duty under Section 149 of the Equalities Act 2010

Fee setting is a function to which section 149 of the Equality Act 2010 applies, and the Service and Community Impact Assessment is the method by which the Council will have due regard to the needs set out in section 149.

Section 149 of the Equalities Act 2010 (“the 2010 Act”) imposes a duty on the Council to give due regard to three needs in exercising its functions. This proposal is such a function. The three needs are:

- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act.
- Advance equality of opportunity between people who share a protected characteristic and those who do not.
- Foster good relations between people who share a protected characteristic, and those who do not.

Complying with section 149 may involve treating some people more favourably than others, but only to the extent that that does not amount to conduct which is otherwise unlawful under the new Act.

The need to advance equality of opportunity involves having due regard to the need to:

- remove or minimise disadvantages which are connected to a relevant protected characteristic and which are suffered by persons who share that characteristic,
- take steps to meet the needs of persons who share a relevant protected characteristic and which are different from the needs other people, and
- encourage those who share a relevant characteristic to take part in public life or in any other activity in which participation by such people is disproportionately low.
- take steps to meet the needs of disabled people which are different from the needs of people who are not disabled and include steps to take account of a person’s disabilities.

The need to foster good relations between different groups involves having due regard to the need to tackle prejudice and promote understanding.

These protected characteristics are:

- age
- disability
- gender reassignment
- pregnancy and maternity
- race – this includes ethnic or national origins, colour or nationality
- religion or belief – this includes lack of belief
- sex
- sexual orientation
- marriage and civil partnership

Context / Background:

Briefly summarise the background to the policy or proposed service change, including reasons for any changes from previous versions.

The Council has a statutory duty to make arrangements for people who, following assessment are in need of care and support.

The services that care homes provide within Oxfordshire play an important role in helping to meet the needs of vulnerable adults. The Council also has an important role in ensuring that there is sufficient capacity within the social care market to meet its future commissioning requirements.

The cost of adult social care and how it should be funded has for many years been the subject of discussion and much media attention. These discussions have taken place at both a national and a local level and in many respects have focused on the cost of care home services. One of the reasons for this is that there is no nationally agreed methodology for calculating the same.

At a local level the council has stated that it is keen to ensure the sustainability of required care home services in Oxfordshire to meet the assessed needs of vulnerable adults. We have also said that we are committed to work alongside providers to ensure that the same is of the highest quality.

At the same time we are also working to support more people in the community so that they do not need to go into a care home. Working with the Districts/City Council and Housing Associations, we have embarked on a major expansion of Extra Care Housing.

The Council estimates that it buys c.33% of all care home places for older people in Oxfordshire.

Each year we set Target Banding Rates for care homes – in Oxfordshire we have bandings representing different payments for different levels of client need.

The Council's decisions about changes to Target Banding Rates

- are important to the Council in meeting its statutory responsibility and
- will influence the sustainability and development of the care home market within this county.

As part of the review process this Council has responded to requirements to

- (a) Assess the actual cost of care in Oxfordshire.
- (b) Consult with providers to hear their views on the same
- (c) Consider local market factors
- (d) Carry out an Impact Assessment as part of the decision making process.

In order to ensure that appropriate consideration was given to these factors the Director for Adult Services undertakes a consultation exercise to help inform decision making about the recommendations.

Proposals:

Explain the detail of the proposals, including why this has been decided as the best course of action.

From April 2017 we are recommending that we revise our Target Banding Rates as follows

- (i) Increase the Target Banding Rate for the residential – extensive specialist category to £515 per week for new placements
- (ii) Increase all existing weekly residential payment rates that are currently paid below £515 per week to £515 per week.
- (iii) Increase the Nursing – Extensive Target Banding Rate to £671 per week for new placements
- (iv) Increase all existing Nursing – Extensive placements that are currently below £671 per week to £671 per week.
- (v) Increase the Nursing – Specialist Target Banding Rate to £750 per week
- (vi) Increase all existing Nursing – Specialist placements that are currently below £750 per week to £750 per week
- (vii) Continue to use these rates as a guide to secure care home placements at a funding level as close to the Target Banding Rates as possible.
- (viii) The above to apply from April 2017 and for care home placements in Oxfordshire.

Background to the Recommendations

Our discussions and consultations with the care sector were progressed to help establish a better understanding of the cost of care in Oxfordshire and to ensure that the Council adhered to government guidance and met its required obligations.

However, this process has also presented us with a number of issues to address

- **The Consultation Process** has generated a limited response and a low number of providers submitting cost structure returns.

This limited response to the consultation has not provided us with sufficient evidence or a sufficiently robust argument to significantly increasing funding.

- **The Use of Cost Models** has also raised questions as there is no nationally agreed methodology for calculating the cost of care.

In Oxfordshire we have adapted a cost model produced by the Association of Directors of Social Services for our base calculations for Residential Care. It makes the assumption that the allowance for Funded Nursing Care can cover the additional costs of nursing services.

We have considered the operating costs presented to us by providers in response to the consultation process. We have questions about their usefulness as while there are some from care homes with bed capacity of round about 50 beds or more, a number of operating costs come from providers with bed capacity lower than the recognised efficient size of 48-50 beds. Therefore, it is questionable whether the council can usefully use and rely on the costs for the smaller homes as representative of operating costs for other care homes in the county.

We have set aside cost data for homes run by The Orders of St. John Care Trust as this has a long-term development contract with the Council that operates on a block purchase arrangement.

- **Financial Pressures & Affordability** - Although the cost structures we did receive indicated cost of provision above that which the council currently pays, providers appeared to recognise the financial position that the council is in. It is worth noting that in many homes fees from the Council will not be the main source of income.

The council's budget planning process has identified that there are significant pressures on the older people's budget. With demographics showing an increasing population of older people over coming years the council will need to allocate resources to meet the needs of an increasing number of vulnerable people. Furthermore, our strategy is to allow people to remain in the community for as long as possible and increasing our spending on care home services would go against our stated business strategy.

- **Sufficiency of Service Availability** - Alongside the above we have recognised that these are clearly challenging times for both providers and purchasers. Under The Care Act 2014 the council has a role in ensuring that there is a sufficient provision to meet existing and increased future service demands.

Sustainability of current provision is key but the care homes market is itself responding to demographics with new services being planned and developed; the majority of these appear to be targeting the private payer market.

We also feel that most if not all new developments are building new services to a high specification. This will then more than likely attract a high price tariff.

Our view here is that if expansion outstrips placements then there may be an increase in the number of vacant beds available unless these are taken up through demographic demand. Inevitably this will add to operating pressures for some providers as they experience vacancies and changing income levels.

We can speculate that in the future the council may be able to more easily access beds in homes that are not to such a high specification; the price for these services may or may not be at a lower than cost price as providers seek to generate income. The counter argument is that some homes will go out of

business and the market may end up being dominated by larger providers aiming at the private market or those purchasers that will accept their rates.

As a result, we have considered whether an increase for inflation, and higher banding rates, should be given to Care Home providers, or whether the funding should instead be spent on supplying a social care service to a wider client base.

To summarise our view is that

- The Consultation Process generated a limited response and a low number of providers submitting cost structure returns.
- There are differences between the cost information for different size homes.
- There are differences between how different cost components in the models are treated.
- Regardless of the cost model used we feel that any cost figure derived can only be an aid to discussion.
- We do not believe that the information we have can support us coming to an informed conclusion about the cost of providing care in Oxfordshire.
- The local market information we have leads us to believe that in general, the care homes market for older people in Oxfordshire is relatively healthy and homes are able to provide service of a good quality.

We have also concluded that if there was a significant increase in our spending on care homes there would be less money available to spend elsewhere within Adult Social Care.

Our view here is that the impact on vulnerable people of the council having less money to spend on other types of support (including support to people in their own homes) would have a greater negative impact on vulnerable and disabled people than a care home fee level increase.

Evidence / Intelligence:

Explain any data, consultation outcomes, research findings, feedback from service users etc that supports your proposals and can help to inform the judgements you make about potential impact of different individuals, communities or groups.

Our approach to evidence /intelligence gathering has involved the following

- Reviewing the existing information available to us about the care homes market in Oxfordshire contained in our Market Position Statement
- Carrying out an open consultation exercise with care homes providers in Oxfordshire in order to establish the cost of providing care in Oxfordshire
- We have met with individual care homes to hear their views.

Reviewing Local Market Factors - We reviewed the local market factors associated with care home provision in Oxfordshire. To do this we reflected on the Market Position Statement we published in September 2014 (see link below) and the feedback we have had from providers as part of the consultation process.

<https://www.oxfordshire.gov.uk/cms/sites/default/files/folders/documents/news/2014/CareHomesMarketPositionStatement.pdf>

Open Consultation - The council embarked upon an open consultation process through the Council's website that

- Asked all care home providers to comment on our identified Options
- Invited them to take part in a review of the cost of providing care home services in Oxfordshire
- Asked them to submit their cost structures to support the responses and feedback they gave.
- The formal consultation ran from 6 February 2017 and this ran until 6 March 2017.

Individual Meetings - To ensure that there were a number of opportunities to obtain feedback we met with individual providers on a confidential appointments basis to discuss operating costs and to receive copies of their operating costs.

Alternatives considered / rejected:

Summarise any other approaches that have been considered in developing the policy or proposed service change, and the reasons why these were not adopted. This could include reasons why doing nothing is not an option.

There were several comments and suggestions that have been highlighted in Table 1 and Table 2 in the Report submitted for decision. A response to each of these suggestions is also included in the report.

We have concluded that if there was a significant increase in our spending on care homes there would be less money available to spend elsewhere within Adult Services. Our view here is that the impact on vulnerable people of the council having less money to spend on other types of support (including support to people in their own homes) would have a greater negative impact on vulnerable and disabled people.

Impact Assessment:

Identify any potential impacts of the policy or proposed service change on the population as a whole, or on particular groups. It might be helpful to think about the largest impacts or the key parts of the policy or proposed service change first, identifying any risks and actions, before thinking in more detail about particular groups, staff, other Council services, providers etc.

It is worth remembering that 'impact' can mean many things, and can be positive as well as negative. It could for example relate to access to services, the health and wellbeing of individuals or communities, the sustainability of supplier business models, or the training needs of staff.

We assess the impact of decisions on any relevant community, but with particular emphasis on:

- Groups that share the nine protected characteristics
 - age
 - disability
 - gender reassignment
 - pregnancy and maternity
 - race – this includes ethnic or national origins, colour or nationality
 - religion or belief – this includes lack of belief
 - sex
 - sexual orientation
 - marriage and civil partnership
- Rural communities
- Areas of deprivation

We also assess the impact on:

- Staff
- Other council services
- Other providers of council services
- Any other element which is relevant to the policy or proposed service change

For every community or group that you identify a potential impact you should discuss this in detail, using evidence (from data, consultation etc) where possible to support your judgements. You should then highlight specific risks and any mitigating actions you will take to either lessen the impact, or to address any gaps in understanding you have identified.

If you have not identified an impact on particular groups, staff, other Council services, providers etc you should indicate this to demonstrate you have considered it.

IMPACT FOR COUNCIL (GENERAL)

The key issues for the council are that it is able to respond to its statutory duty to make arrangements for those people eligible for its support. To do this the council needs to access services which are of the right quality, location and price for an eligible individual. The council also needs to ensure that there is a robust and adequate provision to meet the needs of individuals in a timely way. Where sudden unplanned changes occur in service provision any action taken by the council in response will safeguard the interests of the residents in a care home.

Risks	Mitigations
<p>There is a risk that providers in Oxfordshire may refuse to accept placements at the funding level offered by the council. Service users may need to be placed out-of-county or with alternative services.</p>	<ul style="list-style-type: none"> • The council will maintain its practice of having Target Banding Rates. It will continue to place older people at a fee level as close to the Target Banding level as possible in order to secure the necessary services. • It will review the way that it purchases care home services to determine if its spot purchasing of placements should continue at the current level or whether alternative purchasing arrangements should be put in place.
<p>There is a risk that changes to the composition of the care homes market in Oxfordshire will lead to an imbalance of service provision compared to that which the council needs to meet future demand. Service users may need to be placed in homes not of their first choosing, in out-of-county homes or with alternative services.</p>	<ul style="list-style-type: none"> • The Council will continue to monitor the development and location of existing and new care homes services in Oxfordshire. This will be to determine a care home's willingness to accept council funded residents and the Council's ability to purchase care home beds across the county in specific locations. • The Council will continue to provide information on the composition of the Care Homes Market through its Market Position Statement. • It will review the way that it purchases care home services to determine if its spot purchasing of placements should continue at the current level or whether alternative purchasing arrangements should be put in place to ensure future access to services. • Alternatives such as extra-care housing and care at home will be explored in all cases to ensure that the widest possible care offering is available to meet an individual's assessed needs.
<p>There is a risk that there may be delays in making placements into care homes as it becomes more difficult and takes more time to agree funding levels</p>	<ul style="list-style-type: none"> • The Council will maximise its use of 'Discharge to Assess' and other community based services to ensure that eligible older people receive the most appropriate service and are able to remain in their own home for as long as they wish. • Alternatives such as extra-care housing and care at home will be explored in all cases to ensure that

	<p>the widest possible care offering is available to meet an individual's assessed needs.</p>
<p>There is a risk that the council's relationship with its providers may deteriorate. This may mean that it is unable to influence the future direction of the care homes market in Oxfordshire.</p>	<ul style="list-style-type: none"> • We will continue to maintain dialogue on a regular basis with care home providers about changes within the care home market in Oxfordshire. • We will ensure that information about placement patterns into care homes is made known • We will maintain contact with the relevant Care Associations in Oxfordshire. • In the short-term the Council has produced a Market Position Statement about care home services so that all existing and future care home providers are aware of the Council's strategy & challenges for the future. This will be updated and reviewed
<p>There is a risk that as the care home market in Oxfordshire develops some providers may experience financial pressures and operating difficulties with deteriorating quality of care and/or unplanned closures.</p>	<ul style="list-style-type: none"> • The council will maintain regular planned quality monitoring and service development activity based on an assessment of risk for care homes in Oxfordshire. • We will continue to monitor the financial viability of providers with particular emphasis on those that have a higher proportion of council funded residents as part of their overall resident number or are of a smaller size of home. • We will explore ways in which the council can assist care homes to meet their obligations at an affordable cost through work with the main Care Associations in Oxfordshire.
<p>There is a financial risk that the Council may need to commit additional budget to this service area if it regularly agrees prices above its Target Banding Rates in order to secure access to services</p>	<ul style="list-style-type: none"> • The Council will maintain a robust and regular overview of its financial performance through budget monitoring in order to manage and respond to the same.
<p>There is a risk that if the council needs to pay significantly more than its target banding rates that a reduced number of placements may have to be made per annum to ensure it keeps within budget.</p>	<ul style="list-style-type: none"> • The council will continue to monitor the number of placements it makes in care homes. • It will continue to monitor the financial viability of providers.

<p>This may mean that fewer placements are made by the council and this may impact on a providers' financial stability.</p>	<ul style="list-style-type: none"> • We will explore ways in which the council can assist care homes to meet their obligations at an affordable cost. • It will explore alternative services to care homes whenever possible to ensure that it can maintain purchasing of care home placements within budget.
<p>There may be a reputational risk to the council through adverse publicity and increased complaints if the council finds it is unable to access care home services when needed.</p>	<ul style="list-style-type: none"> • The council will respond to any enquiries in accordance with its agreed procedures. • The Council will maximise its use of alternative community based services to ensure that eligible older people receive the most appropriate service prior to needing to enter a care home.

Impact on Individuals and Communities:

Community / Group being assessed (as per list above – eg age, rural communities – do an assessment for each one on the list)

Summarise the specific requirements and/or potential impact on this community / group, and then highlight the most significant risks and mitigating action that has been or will be taken.

The council wishes to make sure that when considering entering a care home an individual does so taking into account all the alternatives available to them. It is concerned that some individuals may be entering a care home before they need to and as a consequence their resources may be depleted. It also wants to ensure that potential residents have a choice of care home close to where they live and that they are admitted to a care home that provides sustainable good quality care and is financially stable for the foreseeable future. We are concerned that if a home closes residents may have to move elsewhere, staff may lose their employment and/or may exit the market.

Risks	Mitigations
<p>There is a risk that there may be reduced choice options for eligible individuals</p>	<p>In order to ensure that potential residents continue to have a choice of care home</p>

<p>requiring a care home placement. Potential residents may have to accept a place at a care home other than their first choice home and at a location further afield.</p>	<p>whenever possible</p> <ul style="list-style-type: none"> • The Council will continue to monitor the development and location of existing and new care homes services in Oxfordshire to enable potential residents to have a choice of care home. • The council will continue to place older people at a fee level as close to the Target Banding level as possible in order to secure the necessary services. Where necessary this may mean it agrees prices above its Target Banding Rate. • It will review the way that it purchases care home services to ensure that it can access beds and offer as much choice as possible to the people it supports
<p>Family & Friends may need to travel further afield to visit an individual in their care home</p>	<ul style="list-style-type: none"> • The Council will review the care homes market to ensure that whenever possible an individual will have a choice of a home local to them.
<p>There may be delays in making placements into care homes.</p>	<ul style="list-style-type: none"> • The Council will maximise its use of 'Discharge to Assess' and other community based services to ensure that eligible older people receive the most appropriate service. • Where there may be a delay in accessing a placement for whatever reason the Council will explore alternatives to ensure that support is provided in the interim and an individual's assessed needs are fully met.
<p>Some individuals may be entering a care home earlier than they need to.</p>	<ul style="list-style-type: none"> • The council will promote a greater awareness of cost issues for Self-funders so that they can make informed choices about how they wish their support to be provided. • The council will continue to promote alternative service options such as Extra-care Housing or care in a person's own home.
<p>Where a previously self-funding resident in a care home approaches the council for financial support they may be subsequently asked to move from their</p>	<ul style="list-style-type: none"> • The council will ensure that all such cases are considered on an individual basis and will assess the individual to determine their care needs.

<p>care home if they are paying a private fee level significantly above what the council has said it will pay as its Target Banding Rate for such care</p>	<ul style="list-style-type: none"> • The council will continue to fund placements at a fee level as close to the Target Banding level as possible in order to secure the necessary services.
<p>Some individuals in a care home, their family, friends or carers may experience a change in the quality of care provided</p>	<ul style="list-style-type: none"> • The council will maintain regular planned quality monitoring and service development activity based on an assessment of risk for care homes in Oxfordshire. • It will maintain strong links with partners such as the Care Quality Commission and Health Commissioners to ensure that it can respond to complaints or weaknesses in provider services. • Where areas of weakness are identified Council staff will work with providers to ensure that such aspects are improved and sustained.
<p>Some residents may find their care home is faced with unplanned or sudden closure forcing them to move to alternative accommodation, with an associated potential risk to their health and wellbeing</p>	<ul style="list-style-type: none"> • The council will maintain regular planned quality monitoring and service development activity to determine the sustainability of services and to avoid unplanned or sudden closure. • The council will continue to monitor the financial viability of providers to achieve the same. Emphasis will be placed on those homes that have a higher proportion of council funded residents, are of a smaller size, or that have a financial viability rating that suggests they may be facing financial challenges/difficulties. • Where a care home is experiencing particular hardship or financial problems we will review their financial standing as part of our Safeguarding and Business Continuity strategies to determine appropriate action. • Should a care home need to close the council will treat each event under its Safeguarding Procedures. It will work with all stakeholders and partners (specifically colleagues from the NHS in the case of a 'care home with

	nursing') to ensure that a suitable care alternative is found and that there are safe arrangements in place for the transfer of existing residents to a new establishment.
There is a risk that if a care home closes that staff working at the home may lose their employment and may exit the care market.	<ul style="list-style-type: none"> • The council will continue to monitor the financial viability of providers. • Where a home needs to close the council will work closely with the owners to explore alternatives to ensure that alternative employment options are identified and as many of the workforce remain within the care market as possible

No differential impact on individuals and communities beyond those given above has been identified as a result of age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, sexual orientation, marriage and civil partnership, rural communities, areas of deprivation. However, this will be reviewed as the policy develops and is implemented to ensure any impacts are identified and mitigated as far as possible.

Achieving Closure (ADASS)

http://www.adass.org.uk/images/stories/Publications/Miscellaneous/Achieving_Closure.pdf

Short-notice care home closures: a guide for local authority commissioners (SCIE)

<http://www.scie.org.uk/publications/homeclosures/>

Impact on Staff:

Summarise the specific requirements and/or potential impact on staff, and then highlight the most significant risks and mitigating action that has been or will be taken.

The main area of risk here is in respect of increased demand for support from other Directorate services. There may also be attention and resources drawn away from the Directorate's normal business in order to respond to care homes fees issues.

Risks	Mitigations
Additional workload on Council Placement and Adult Social Care staff as they work harder to achieve placements.	<ul style="list-style-type: none"> • The council will continue to fund older people at a fee level as close to the Target Banding level as possible in

	<p>order to secure the necessary services.</p> <ul style="list-style-type: none"> Should additional resources be needed within the placement process the council will review this to maintain placement performance levels.
Additional workload on Social Care assessment staff if required to move clients to alternative accommodation	<p>Any moves will be considered under Safeguarding Procedures that will require a project approach to actions and activities.</p> <p>The Council will ensure that dedicated staff is identified to support any moves.</p>
Increased management of complaints and representations	<p>To avoid an escalation in complaints/representations we will present clear information to residents and potential residents about the reasons for any changes to help avoid complaints and representations.</p>

Impact on other Council services:

Summarise the specific requirements and/or potential impact on other council services, and then highlight the most significant risks and mitigating action that has been or will be taken.

The main area of risk here is in respect of increased demand for support from other council services.

Risks	Mitigations
Additional workload for Media and Communications Team as they respond to media enquiries	To avoid an escalation in representations we will present clear information to residents and potential residents about the reasons for any changes in services.
Additional workload for complaints and legal services as a result of having to advise on and respond to service changes.	Presentation of clear information to residents, family and carers. Regular communication to these groups throughout.
Increased demand for support from Council's Finance staff to support the Joint Commissioning function.	The Council will review the financial health of the care homes sector.

Impact on providers:

Summarise the specific requirements and/or potential impact on providers of council services, and then highlight the most significant risks and mitigating action that has been or will be taken.

The key impact for providers is that there may be a change in their cost/income profile that then places further pressure on their operation and service delivery. For providers less able to absorb such changes this may affect different areas of their operation to varying degrees.

Risks	Mitigations
<p>There is a general risk that for some homes the providers financial profile will change and that this may put pressure on their service delivery.</p>	<ul style="list-style-type: none"> • The council will on a regular basis review the performance of care homes in Oxfordshire looking at the core components listed in the Evidence/Intelligence section (listed above) • Wherever possible the Council will identify homes that may be experiencing financial difficulty or at risk of closure. • We will continue to maintain dialogue on a regular basis with care home providers in Oxfordshire. • The council will continue to liaise with the Care Quality Commission and colleagues from the NHS to discuss areas of concern.
<p>There is a risk that providers may find it difficult to recruit staff and staff may migrate to other higher paying providers</p>	<ul style="list-style-type: none"> • The Council is addressing Workforce needs through the development of a new Workforce Strategy. • The council will review new care home developments to judge the potential impact on staff retention at existing homes in the vicinity and migration of staff to new providers.
<p>If a provider finds that it cannot maintain appropriate standards due to changes in its operating finances, there may be a reduction in the quality of service delivered.</p>	<ul style="list-style-type: none"> • The council will maintain regular planned quality monitoring and service development activity based on an assessment of risk for care homes in Oxfordshire. • It will maintain strong links with partners such as the Care Quality Commission and Health

	<p>Commissioners to ensure that it can respond to complaints or weaknesses in provider services.</p> <ul style="list-style-type: none"> • A key element of this work will be to seek the views of residents and families to determine the quality of service delivered. • Where areas of weakness are identified Council staff will work with providers to ensure that such aspects are improved and sustained.
<p>There may be a change in the operating cost/income profile for smaller homes/small single home operators in particular and this may make them more susceptible to sudden/unplanned closure than larger homes</p>	<ul style="list-style-type: none"> • The council will maintain regular planned quality monitoring and service development activity to determine the sustainability of smaller homes to help avoid unplanned or sudden closure. • The council will continue to monitor the financial viability of providers to achieve the same. Emphasis will be placed on those homes that have a higher proportion of council funded residents, are of a smaller size, or that have a financial viability rating that suggests they may be facing financial challenges/difficulties. • Where a care home is experiencing particular hardship or financial problems we will review their financial standing as part of our Safeguarding and Business Continuity strategies to determine appropriate action.

Action plan:

Summarise the actions that will be taken as a result of the assessment, including when they will be completed and who will be responsible. It is important that the officer leading on the assessment follows up to make sure the actions are completed, and updates the assessment as appropriate. Any significant risks identified should also be added to the appropriate service or directorate risk register, to ensure they are appropriately managed and reviewed.

Action	By When	Person responsible
Continue to review how we procure care home placements	April 2018	Lead for Commercial Services & Market

		Development
On-going Quality Monitoring & Service Development programme to assure quality and viability of care home services in Oxfordshire	On-going	Lead for Quality & Contracts
On-going review of the care home market and new care home developments in Oxfordshire	On-going	Lead for Commercial Services & Market Development
Continue to develop alternative services such as Extra Care Housing and support at home	On-going	Lead for Commercial Services & Market Development
Regular dialogue with Care Associations in Oxfordshire and individual care homes	On-going	Staff in Joint Commissioning
Review of Market Position Statement	On-going	Lead for Commercial Services & Market Development
Review the financial viability of care home providers	On-going	Lead for Quality & Contracts
Maintain strong links with the Care Quality Commission and Oxfordshire Clinical Commissioning Group to share market intelligence	On-going	Lead for Quality & Contracts

Monitoring and review:

Try to be as specific as possible about when the assessment will be reviewed and updated, linking to key dates (for example when consultation outcomes will be available, before a Cabinet decision, at a key milestone in implementation)

This Impact Assessment is considered to be an ever-evolving document and will be reviewed on a six monthly basis from September 2017 onwards

Person responsible for assessment:

Andrew Colling, Lead for Quality & Contracts (Joint Commissioning)

Version	Date	Notes (eg Initial draft, amended following consultation)
1.0	11 September 2017	Revised Draft