

Impact Assessment



Assessment of: North Devon Link Service (Part of the mental health services in Northern Devon) – updated following formal consultation period.

Service: North Devon Link Service

Head of Service: Solveig Wright

Version / date of sign off by Head of Service: 27.2.2024

Assessment carried out by (job title): Commissioning Development Officer

Previously published impact assessments on these proposals

Please note that this is the fourth impact assessment on these changes as we continue to consult on them, previous impact assessments were:

- Impact assessment following engagement and consultation, accompanying Cabinet report on future of service – 30th November 2021
- Updated impact assessment taking account of increased financial challenge facing DCC, accompanying further consultation on change proposals – 14th February 2023.
- Updated impact assessment accompanying consultation on change proposals – 2nd November 2023.

1. Description of project / service / activity / policy under review

Prior to the Covid-19 pandemic, there were four Link Centres in North Devon located in Barnstaple, Bideford, Holsworthy and Ilfracombe. The service supported people with mental health and wellbeing difficulties, signposted to other services where necessary or worked to find practical ways of resolving particular problems, including housing, debt and benefit difficulties. The service primarily involved drop-in sessions where people could socialise and make friends. Time limited community outreach for people struggling to leave their home was also provided as capacity allowed.

There was no charge for the service and people could refer themselves or ask a health or social care professional to refer them. The Council does not commission any equivalent services elsewhere in Devon; the Link Service is inconsistent with service delivery across the county.

Following the centre closures through the Covid-19 pandemic, the drop-ins were re-opened in March 2021 on an appointment only basis. Drop-ins were then reinstated for two sessions a week in July 2022, extending to three sessions per week at the beginning of September 2022.

The service provides a traditional drop-in day service together with some enabling support. The groups offer social interaction and activity rather than any evidenced-based model of mental health service delivery. The service was designed to provide a range of social, leisure, support, guidance, and educational opportunities for adults with mental health issues.

The Link Service is part of the health and care system supporting mental health needs across Northern Devon. Each GP surgery, as part of a Primary Care Network, has a Mental Health Multi-Agency Team (MAT) which can offer support in the first instance and refer people to Devon Mental Health Alliance or other community-based services.

Other services include: Community Mental Health Teams, Mental Health Social Work Teams, crisis services such as The Moorings Crisis Café, a 24-hour support phone line from Mental Health Matters and Devon Partnership Trust's First Response Service, as well as the Devon Mental Health Alliance which is developing more services in North Devon. The Link Service does not provide urgent or crisis support.

The Link service is funded by the Council and managed by Devon Partnership Trust (DPT) under a Section 75 agreement which allows for the delegation of functions to other partners. The service costs £485k per year to run (mostly staff costs), funded by the Council, which also owns the buildings.

2. Proposal, aims and objectives, and reason for change or review

This impact assessment relates to the following proposal:

1. To close the North Devon Link Service Drop-in services that run from the Link Centres in Barnstaple, Bideford and Ilfracombe.
2. To note that the closure would include ceasing the short-term enabling support to those service users in receipt of Care Act 2014 eligible services. The Council and Devon Partnership Trust will assist those people to access alternative equivalent support.
3. To work with Devon Partnership Trust and the Devon Mental Health Alliance to support all service users in their transition to alternative community support over a period of 3 months minimum.

In line with its statutory responsibility, Devon County Council will continue to provide adult social care support to people who are eligible under the Care Act 2014.

Devon Partnership NHS Trust and Devon County Council have engaged with everyone who is on the North Devon Link Service caseload to establish whether they require or want a Care Act 2014 assessment.

Devon Partnership NHS Trust and Devon County Council will also assist people who are not Care Act 2014 eligible in identifying other services.

The reasons for change:

In 2022, national Community Mental Health Framework funding was used to establish the Devon Mental Health Alliance which has been working with local partners to develop services for local people, both directly and through wider community development. As a result, local people in North Devon can now access mental health support services in ways they could not previously. These new services are accessed through GP practices and the wider primary care team, and they are developing in reach and number.

During the consultation in February 2023, service users described themselves as having severe mental health needs or that their mental health needs are too complex to be managed in primary care, but not severe enough for secondary care. They reported that they felt the drop-ins were the only support available to them.

While the Council acknowledges the strength of feeling on this matter, the service is not commissioned to provide support for mental health needs that are too complex to be managed in primary care.

In recent years, there has been a national focus and national investment to improve and develop the way community mental health services are delivered, and to address the gap between primary and secondary care. This means improved accessibility to mental health services and an increased range of support with the introduction of the Devon Mental Health Alliance (DHMA): a partnership between six voluntary, community and social enterprise (VCSE) organisations (CoLab Exeter, Devon Mind, Improving Lives Plymouth, Rethink Mental Illness, shekinah, and Step One Charity) dedicated to providing support for people experiencing challenges in their mental health. The Alliance works in partnership with Devon Partnership NHS Trust to develop good connectivity across voluntary and community organisations, multi-agency teams and urgent care services as part of the community mental health framework.

Each GP surgery, as part of a Primary Care Network, has a Mental Health and Wellbeing Team (MHWBT) which can offer support in the first instance and refer people to Devon Mental Health Alliance or other community-based services. This new Multi-Agency Team approach in mental health establishes a shared approach to meeting population mental health needs. By establishing a virtual team across service boundaries, the MAT approach seeks to understand the needs of the whole person in the context of their support networks and communities and enable a single person-centred plan to be developed. The Mental Health MAT will also collectively ensure that available resources are meeting needs, developing future services and strengthening community assets in addressing any gaps in provision.

These services were not available at the time the Link Service started, and that forms an important part of the rationale for proposing the Link Service closure. With specific national funding provided to the NHS to develop community health and wellbeing support, it is reasonable to question whether Council funding should be used to fund very similar services.

The successful transfer of the Holsworthy Link service to Holsworthy Youth and Community Hub, a community-led centre which offers a wide range of community support, also helped inform this proposal. It is a community-led centre which works with other organisations in the town and offers a wide range of community support sessions.

The recommendation does not affect peoples' right to support under the Care Act 2014. Where it is identified that people have eligible care and support needs that require a Care Act 2014 assessment, we will ensure that one is carried out. In addition, all service users are entitled to request a care needs assessment.

The Council is committed to supporting adults with mental health and wellbeing needs in the best way that it can. To do this well we must constantly review everything we do to make sure people are getting the best possible outcomes from the resources we have available, and that access is as equitable as possible for everyone across the county.

Whilst the consultation was about the service and not the buildings, it should be noted that the Bideford and Ilfracombe buildings will cost around £306,000 to maintain over the next five years.

3. Risk assessment, limitations and options explored (summary)

The main themes of feedback were:

- That the Link Centres should remain open, they offer activities that are beneficial to support people's mental health, and a safe place to go.
- That if the Link Centres close then alternative services need to be offered with trained and skilled staff and help to access them.
- Increased pressure will be placed on other existing services that were felt to be lacking.
- There are opportunities to be more creative with the buildings, or consolidate into a single Link Centre,
- Concern about increased risk of suicide or crisis is acknowledged but the North Devon Link Service is not a crisis service and never has been. DPT has a dedicated 24/7 urgent mental health service, which is the gateway for families and professional to access appropriate crisis support and intervention if someone is experiencing mental health distress, or for people worried about someone else's emotional state.
- Further training could be provided to staff, and the services could increase the reach they are having.
- An observation that one-to-one support is beneficial, particularly face-to-face, and in people's homes.
- There are other services that are more recovery focussed.

- Staff feedback was focused on understanding the implication of the proposals on their on-going employment and how it might impact the terms, conditions, and entitlements of their employment.
- Staff wanted to understand what the process of closing the Link Centres would look like if the proposal went ahead.

Following feedback from the public consultation, the following alternative options have been developed and considered. In summary the alternative proposals are:

- a. Expand the services – open for more hours with open access. NDLS staff to continue to provide support with more classes and groups.

It has already been identified in this document that the service was commissioned to provide social support services that are now provided by other services and funded through other Government funding routes. As part of recent national and local community mental health development, there is an expanded community mental health offer in primary and secondary care to meet a wider set of needs to complement any social support. The council does not have alternative sources of funding available to it and the priority for Adult Social Care funding has to be used to meet our statutory duty for service users with eligible needs under the Care Act 2014.

- b. Create Specialist Hubs. Keep drop ins run by current staff. Maintain the buildings in each town. Allow voluntary/community organisations to use the buildings for groups and classes. Allow local business to use the buildings to reduce stigma and improve trust. Charge for the use of the buildings to generate income.

Although this option would go some way to making services delivered by the community and voluntary sector more accessible, the Council does not favour this option, as it would still be delivering a service to people without Care Act 2014 eligibility and duplicating services that are available through other services and funded by other Government funding streams. The Council has confirmed that it would be open to offering the buildings for wider community use, however even with charging a fee this, would not generate sufficient income to cover the cost of the service.

- c. Centralise the drop-in sessions in one building in one town with the current staff. Develop and implementation plan with staff and services users around the closure of the remaining centres.

The Council does not favour this option as it would still be delivering a service to people without Care Act 2014 eligibility and duplicating services that are available through other services and funded by other Government funding streams. It would also mean an inequity of offer across North Devon.

- d. Use existing NHS mental health funding to maintain the Link centres.

The Council does not consider this to be a realistic option and Devon Partnership Trust supports that position. This is not the most cost-effective model compared to the Devon Mental Health Alliance and VCSE offers and also duplicates services that are available through other services and funded by other

Government funding streams.

Impacts will be monitored through the governance of the Mental Health Partnership Board. In addition, if Devon County Council grant fund any voluntary and community organisations to host drop ins, like the Holsworthy model, there will be ongoing monitoring of access, uptake and outcomes.

4. People affected, diversity profile and analysis of needs

- People of working age with a Mental Health Need diagnosed and undiagnosed who live in North Devon.
- Staff who work in the services.
- Carers
- 130 people who have attended the centres at least once in the last 18 months.

People on the North Devon Link Service Caseload –
note only just over half (130) of those have attended at
least once in the last 18 months

Team	2021	2023
Link Centre Barnstaple	78	58
Link Centre Ilfracombe	82	74
Link Centre Bideford	105	107
Total	265	239

5. Stakeholders, their interest, and potential impacts

- Community Mental Health Teams – have requested that the drop ins revert to open access. This has not been possible due to NDLS staff supporting the short-term enabling service for people with Care Act 2014 eligibility. In addition, the expanded community mental health offer in primary and secondary care and the development of the Devon Mental Health Alliance has resulted in access to alternative mental health support services that were not previously available. North Devon Link Service was sometimes used as a destination to discharge people from the Community Mental Health Teams or to monitor people whilst they were on the waiting list.
- North Devon Social Work Teams have been supported by the North Devon Link Service staff to undertake assessments and provide short-term enabling support.
- Community and Voluntary sector organisations – some of the services provided by the North Devon Link Service are also offered by the Voluntary and Community Sector.
- Devon Mental Health Alliance – can provide drop-in group sessions, one to one support and support people to access other mental health services.
- GPs used to signpost to the service when it was open access.
- Carers and families. The Link Service was used as a brief period of respite to carers and families (although it was not commissioned as a respite service).

- General Public and wider local community.

6. Additional relevant research used to inform this assessment

- Mental Health needs Assessment 2013
- Link Centre Performance Dashboard
- DCC charging policy
- Care Notes
- 5 ways to wellbeing
- Reaching for Independence guidance and reviews
- Government Covid-19 Guidance
- Community Mental Health Framework guidance and proposals
- Care Act 2014 guidance
- Social Prescribing: applying All Our Health (Gov.UK)
- Social prescribing (Royal College of Psychiatrists)

7. Description of consultation process and outcomes

An engagement and consultation process was undertaken during 2021 to inform the recommendations agreed by Devon County Council Cabinet in December 2021.

The ongoing review of the centres came into sharper focus with the increased financial pressure on Devon County Council in the run up to the February 2023 budget, resulting in further consultation on the future of the service.

The Council ran a consultation from 22nd February to the 9th May 2023, publishing the consultation proposal and questionnaire on the Council Have Your Say webpage and posting the documents with a prepaid return envelope to 130 people who had used the service since it re-opened in July 2022.

A further period of consultation ran from 6th November to 6th December 2023 to provide people with more information and expand on the consultation already undertaken. The second consultation proposal and questionnaire were published on the Have Your Say webpage and posted with a prepaid reply envelope to all people on the caseload (206), not just those who had been using the service.

All the responses received from the two consultations and the seven in-person visits have been taken into consideration in producing the impact assessment and the proposal.

We heard from some people accessing the service that due to their social anxiety, a large public meeting would not be appropriate for them. Meetings for service users were held at each of the centres in November 2023 including the Cabinet member for Adult Care and Health, and officers from the Council and Devon Partnership NHS Trust. Cllr McInnes and officers from the council and Devon Partnership NHS Trust.

The Cabinet member for Adult Care and Health, Cllr McInnes and the Deputy Director of Adult Social Care joined Selaine Saxby MP to meet with services users in Ilfracombe in August 2023.

Further visits to the three centres took place with the inclusion of DCC North Devon members and representatives from the Mental Health Alliance in January and February 2024. These subsequent visits allowed service users and members to hear in more detail about the services offered by the Alliance and how they can help shape the further developments of the service.

Link Centre staff were issued with details of the proposal and given the opportunity to complete a questionnaire. There were two face to face staff meetings where staff were able to raise any questions about the proposal and put forward any ideas. A set of Frequently Asked Questions with answers, to reflect questions asked throughout the consultation, were circulated to staff. The subject has also been discussed at the Joint Consultative Committee where the unions were engaged.

A number of key stakeholders were also briefed through the consultation including:

- North Devon and Torridge District Councillors (via their Committee Services teams)
- Barnstaple, Bideford and Ilfracombe Town Councillors
- NHS, Community and Voluntary Sector organisations that had been involved with the previous consultation
- Meetings have been held with local MPs, once for each consultation
- Meetings were held for County Councillors from North Devon, one in person in February 2023 and two via Teams in March and October 2023.
- A frequently asked questions document with answers has been developed and displayed in the Link Centres.
- Briefings were sent to the local media and regular posts placed on the Council’s social media pages.

A total of 257 responses were received over the two consultations.

Consultation period	Postal	Online	e-mail or letter
22 nd Feb – 9 th May 2023	49	126	18
6 th Nov – 6 th Dec 2023	44	20	
Total	93	146	18

Due to the anonymous nature of the form, it is not possible to tell how many individual responses were received.

Background information

8. Equality analysis

Under the Equality Act 2010, the local authority must consider how people will be affected by a service, policy or practice. In so doing we must give due regard to the need to: eliminate unlawful discrimination, harassment and victimisation; advance equality of opportunity and foster good relations across protected characteristics of age, disability, gender reassignment, pregnancy and maternity, marriage and civil partnership (for work), sex, sexual orientation, race, and religion and belief. The Equality Act 2010 and other relevant legislation does not prevent the Council from taking difficult decisions which result in service reductions or closures for example, it does however require the Council to ensure that such decisions are: informed and properly considered with a rigorous, conscious approach and open mind, taking due regard of the effects on the protected characteristics and the general duty to eliminate discrimination, advance equality and foster good relations; proportionate (negative impacts are proportionate to the aims of the policy decision); fair, necessary, reasonable, and those affected have been adequately consulted.

- a) Is this group negatively or potentially negatively impacted, and in what way?
- b) What could be done or has been done to remove the potential for direct or indirect discrimination, harassment or disadvantage and inequalities?
- c) In what way do you consider any negative consequences to be reasonable and proportionate in order to achieve a legitimate aim?
- d) What can be done to advance equality further? This could include meeting specific needs, ensuring equality of opportunity and access, encouraging participation, empowering people, making adjustments for disabled people and action to reduce disparities and inequalities.
- e) Is there a need to foster good relations between groups (tackled prejudice and promote understanding) and help people to be safe and protected from harm? What can be done?

All residents by geographic area

This service is provided for people with mental health and wellbeing needs and is part of the wider mental health services in Northern Devon.

Age

The service is for adults so can be used by people needing support around their mental health and wellbeing who are over 18. It has not been widely used by younger people.

Disability (includes sensory, mobility, mental health, learning disability, neurodiversity, long term ill health) and carers of disabled people

The service is for adults covered by the disability protected characteristic, as they will be affected by mental health issues.

The proposal to close the North Devon Link service, will mean that people with a wellbeing need or mental health need, diagnosed or undiagnosed, will not be able to access the service.

Potential mitigation of that impact will come from effective access to the wider mental health services across Northern Devon. The Link Service is part of the health and care system supporting mental health needs across Northern Devon. Other services include Community Mental Health Teams, Mental Health Social Work Teams, a mental health ward and crisis services such The Moorings (Crisis Café), a 24-hour support phone line from Mental Health Matters and DPT's First Response Service. The Link Service does not provide urgent or crisis support.

National investment, in recent years, in the development of community mental health services has improved accessibility to mental health services and increased the range of support available with the introduction of Devon Mental Health Alliance.

Devon Mental Health Alliance is funded to provide support to 1500 people each year across Devon, and their staff are visiting the Link Centres to listen to service users about what they need in order to help inform their offer in North Devon. The Alliance is not expecting to replicate the Link Service, but it can provide drop-in group sessions and one to one support. They can also support people to access other mental health services offered in the local area, using a process referred to as a "warm handover" where they accompany people to help them settle in. They also provide advice and training for people who run their own formal and informal peer support networks, and have recently offered that to a Link Centre Service user who has set up their own peer support group.

Every GP surgery, as part of a Primary Care Network, has a Mental Health Multi Agency Team (MAT) which can offer support in the first instance and refer people to Devon Mental Health Alliance or other community-based services.

These services were not available at the time the Link Service started.

The Council will work with Devon Partnership NHS Trust and the Devon Mental Health Alliance to support all service users in their transition to alternative community support over a period of 3 months minimum.

The recommendation does not affect peoples' right to support under the Care Act 2014. Where it is

identified that people have care and support needs that required a Care Act 2014 assessment, we will ensure that one is carried out. In addition, all service users are entitled to request a care needs assessment.

Service users already receiving other mental health support will continue to do so. People who are not in receipt of additional services through Devon Partnership NHS Trust can access mental health support through voluntary and community sector, including the Devon Mental Health Alliance, as well as urgent or crisis response if needed, regardless of any proposal or decision on the future of the Link Service.

Race and culture: nationality/national origin, ethnic origin, skin colour, religion and belief, asylum seeker and refugee status, language needs

The service is available to people requiring mental health support regardless of culture or ethnicity but does not contain any specialist activity based on that characteristic.

The proposal has a neutral impact on people with this protected characteristic.

Sex and gender identity and reassignment (including men, women, non-binary and transgender people), and pregnancy and maternity (including women's right to breastfeed)

This service is available to people requiring support for their mental health needs regardless of sex, gender, or gender identity. However, there is no specialist activity based on that characteristic.

The proposal has a neutral impact on people with this protected characteristic

Sexual orientation, and marriage/civil partnership if work related

The North Devon Link Service is available to people requiring mental health support regardless of their sexual orientation and marriage/civil partnership but does not include any specialist activity based on the that characteristic.

The proposal has a neutral impact on people with this protected characteristic.

Other relevant socio-economic factors and intersectionality

This includes, where relevant: income, housing, education and skills, language and literacy skills, family background (size/single people/lone parents), sub-cultures, rural isolation, access to services and transport, access to ICT/Broadband, children in care and care experienced people, social connectivity and refugee status/no recourse to public funds. Also consider intersectionality with other characteristics.

Although the service is for people who require support for poor mental health and wellbeing, some service users may also be subject to deprivation, literacy, digital exclusion and transport and access due to the rurality of Northern Devon.

People who have Care Act 2014 eligible needs will be supported, using a strength-based approach, to find alternative provision

9. Human rights considerations:

We need to ensure that human rights are protected. In particular, that people have:

- A reasonable level of choice in where and how they live their life and interact with others (this is an aspect of the human right to 'private and family life').
- An appropriate level of care which results in dignity and respect (the protection to a private and family life, protection from torture and the freedom of thought, belief and religion within the Human Rights Act and elimination of discrimination and the promotion of good relations under the Equality Act 2010).
- A right to life (ensuring that nothing we do results in unlawful or unnecessary/avoidable death).

The provision of mental health support services is a way of ensuring the human rights of citizens are upheld.

10. Environmental analysis

An impact assessment should give due regard to the following activities in order to ensure we meet a range of environmental legal duties. The policy or practice does not require the identification of environmental impacts using this Impact Assessment process because it is subject to (please mark X in the relevant box below and proceed to the 11, otherwise complete the environmental analysis information below):

Devon County Council's Environmental Review Process	N/A
Planning Permission	N/A
Environmental Impact Assessment	N/A
Strategic Environmental Assessment	N/A

- Description of any actual or potential negative consequences and consider how to mitigate against these.
- Description of any actual or potential neutral or positive outcomes and consider how to improve as far as possible.

Reduce, reuse, recycle and compost

N/A

Conserve and enhance wildlife

N/A

Safeguard the distinctive characteristics, features and special qualities of Devon's landscape

N/A

Conserve and enhance Devon's cultural and historic heritage

N/A

Minimise greenhouse gas emissions

N/A

Minimise pollution (including air, land, water, light and noise)

N/A

Contribute to reducing water consumption

N/A

Ensure resilience to the future effects of climate change (warmer, wetter winters; drier, hotter summers; more intense storms; and rising sea level)

N/A

Other (please state below)

N/A

11. Economic analysis

- a) Description of any actual or potential negative consequences and consider how to mitigate against these.
- b) Description of any actual or potential neutral or positive outcomes and consider how to improve as far as possible.

Impact on knowledge and skills

There will be a limited negative impact on knowledge as skills as some staff in the centres may not be redeployed.

Impact on employment levels

There will be a limited negative impact on knowledge as skills as some staff in the centres may be made redundant.

Impact on local business

There will be a neutral impact on local businesses as these are not commercial centres.