

# Adult Social Care proposed new charging policy consultation report

## EQUALITY ANALYSIS (EQUALITY IMPACT ASSESSMENT)

September 2012

SCOPE	
Portfolio	Health and Wellbeing
Service Area	Adult Social Care
Consultation	Adult Social Care Fees and Charges Fairer Charging Policy
Proposed changes being assessed	A range of proposals to increase charges for non-residential Adult Social Care aligned to certain key objectives: 1. To facilitate fair and equitable charging 2. To ensure charges (where appropriate) cover the cost of the service provided.
New or existing policy?	This is a modification to existing policy
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### 1. The Changes Proposed

a) To establish fair charging.

To remove differences in treatment between those managing their own care using personal budgets and those whose care is managed by the council.

b) To charge for the full cost of services provided

To eliminate (where possible and appropriate) varying degrees of subsidy in relation to services currently provided free of charge or at rates significantly below actual cost.

To establish the principle of full cost recovery.

c) To increase the cost per day for day care

Currently this is charged at a subsidised flat rate. It is proposed that this should be increased to cover a range of actual costs.

d) To charge home care based on full cost recovery.

The proposal asked whether people in rural areas should be charged more or whether the cost should be averaged so that everyone pays the same.

Currently this is charged at the same rate for both rural and urban areas. e) To introduce charging for care-related transport

That is to withdraw the subsidised nominal charge for care-related transport and replace this with a charge that will recover the full cost and also to stop paying transport costs for those in receipt of the Disability Living Allowance Mobility Component.

f) To introduce charges for carer's services

Currently these are free of charge. It is proposed to introduce charges for carer's services.

g) To introduce charges for supported employment

Currently this is provided free of charge. It is proposed to introduce variable charges to cover the actual cost of this service.

h) To increase the charge for meals

Currently this is set at a subsidised level. It is proposed to increase this to a cover the actual cost of provision.

Note: With the exception of meals provision where it is proposed that everyone will pay, other services will be means tested. Whether any given individual will pay will depend on a financial assessment. Only those who can afford to pay will pay the increased charges.

## 2. The Consultation Process

The consultation was widely publicised with advertising in Herefordshire Matters, the local press and radio, and by posters were placed in community centres, GP surgeries and local post offices.

The consultation combined four streams of activity covering:

#### a) Engagement with Service Users

The main mechanism for the consultation was a questionnaire delivered to the homes of more than two thousand service users. A second tranche of around five hundred was delivered to the homes of service users with learning disabilities under an 'Easy Read' covering letter offering encouragement and advice on obtaining assistance with filling in the form. A reminder letter was sent part way through the consultation period. Additional copies were distributed at various meetings and were available on demand via both hotline and website. The form was reply paid. An online version of the questionnaire was also available on the consultation website.

The questionnaire contained extensive comment fields and opinions were explicitly sought, complementing the formal analysis based on enumerating answers to questions.

An extensive series of meetings were held at Day Centres and other locations and the views of service users collected.

#### b) Engagement with Organisations and Professionals

- Meetings were held with various provider groups, pressure groups and with professionals from within HPS. Comments were recorded and summarised for the purposes of the report.

#### c) Engagement with the Wider Public

Three main channels were made available to record the views of members of the wider public:

- A web page for written comments was provided on the HPS website
- A telephone hotline was available to answer queries and to record verbal comments
- A public meeting was held at the Kindle Centre

The availability of these facilities was publicised with a half-page advertisement in 'Herefordshire Matters'.

#### d) Equality Analysis (Equality Impact Assessment)

This Equality Analysis has been an integral part of the consultation process. Considerable effort has been aimed at collecting and recording of the views of those affected and interested. As well as considering the impact of the proposed charging changes on the 'protected groups' we have also identified other 'affected groups' (those in rural locations and carers) who are particularly affected.

### 3. The Evidence Gathered

#### 3.1 Questionnaire

A total of 564 responses were received (by post and online) representing approximately one quarter of all service users.

The questionnaire was largely aimed at establishing rates of approval or disapproval in relation to each proposed change however a text field was included with each question and a substantial number of comments have been recorded (over 1,200).

922 of those receiving a questionnaire currently do not pay charges and would not be adversely affected by the proposal for increased charges , other than the meals proposal as charges are applied outside of the financial assessment framework.

### 3.2 Qualitative evidence

A considerable effort was made to collect personal comments and anecdotal evidence on the impact of the proposed changes from all relevant sources and these have been used to inform the Equality Analysis.

The sources of this evidence are

- Questionnaire text-based open questions (see above)
- Telephone hotline tickets
- Comments collected at meetings with service users
- Comments collected at the public meeting
- Comments collected from meetings with service providers
- Comments collected from the meeting with HPS professionals
- Comments collected from Pressure groups
- Information taken from correspondence received

In total more than 2,000 comments and statements on the proposed changes have been collected from service users and their relatives, providers and professionals, and from concerned members of the public. These have been analysed and used to inform the Equality Analysis.

#### 4. Impact of Proposed changes on Protected Groups

The proposed changes are perceived to be broadly neutral in impact except where indicated in red below:

	PROTECTED GROUP:							
	Age	Disability	Gender	Marriage	Pregnancy / Maternity	Race / Ethnicity	Religion	Sex / Sex Orientation
CHARGE:								
Day Care								
Home Care								
Transport								
Carer's Services								
Supported Employment								
Meals								

By the nature of services being delivered, the people in receipt are those who have an eligible need which would usually arise from disability or age. It is therefore these protected groups who will be affected by these proposals.

## 5. Impact of Proposed Changes on 'Affected' Groups

The evidence gathered indicates that service users in rural areas and carers will be affected by the proposed changes

		Rural dwellers
<b>CHARGE:</b>		
Day Care		
Home Care		
Transport		
Carer's Services		
Supported Employment		
Meals		

Together with the older people and those with a disability, the three groups above are affected by the proposed changes.

## 6. Summary of Impact by Group

### Protected Groups:

Age – The proposed increase in charges impact on older people as they are a significant user group of Adult Social Care. With the exception of Supported Employment charges, all of the proposed changes impact this group. Individuals, however, would not pay more than they could afford to pay following financial assessment. The comments from consultation indicate a sense of disappointment that their expectation of support in old age after paying taxes would not be met. The proposed changes have raised anxiety about additional financial stress (despite the fact that many will not be affected because their financial assessment establishes that they cannot afford to pay). There could be an increase in demand for financial assessments and, from the consultation exercise, indications of a fall in demand for services as a result of the changes to cost.

Disabled – The proposed changes impact on people with a disability as, again by the nature of the service, they are key users. Comment from the consultation is that the consequences of the proposed changes will also fall on the families and others providing support. They benefit from the ‘free-time’ provided when the person they care for is occupied with an activity. If service take-up falls as a result of higher charges, it is the view of families and carers that they will need to make additional provision. Charging for supported employment particularly is perceived as reducing economic and social opportunity.

Gender – The consequences of the proposed changes fall equally on both genders.

Marriage – No disproportionate effect intrinsic to the changes as such. However it has been observed that a high proportion of carers are partners. Charging for Carer’s Services may result in partners not accessing respite .

Pregnancy/ Maternity – The proposed changes have no disproportionate effect.

Race/Ethnicity – The impact of the proposed changes is not affected by race or ethnicity.

Religion – The impact of the proposed changes is not affected by religion.

Sexual Orientation – The impact of the proposed changes is not affected by sexual orientation.

### Affected Groups:

Carers – This group will be affected by the proposed changes. Charging for Carer’s Services in particular has resulted in a high proportion of feedback that this is deemed an unfair proposal. Many felt that carers save the local authority a large amount of money through their caring role. The change could lead to lower levels of voluntary caring and consequently a greater cost in the longer term. Implementing charging may impact on the recently developed Carers Strategy which has a strong prevention element.

Rural Dwellers – Those living in rural locations already have additional issues in terms of accessing services. Comments from the consultation were that individuals should not be penalised for living in rural areas. Increasing charges for transport and home care will impact on this group.



## 7. Analysis of Risks identified from the consultation activities of the proposed changes

	Risk	Further Effect
<b>Affected Service:</b>		
<b>Transport</b>	<ul style="list-style-type: none"> <li>'Actual cost' favours those living close to services and facilities and could affect those living in rural areas</li> </ul>	<ul style="list-style-type: none"> <li>Can be seen as discriminatory to those living in Rural areas or further away from current services</li> <li>Rural service users may face difficulties in attending regular appointments (G.P/ Hospital) Important appointments may be missed.</li> <li>Rural public transport is currently a problem for many and current policy proposals e.g. TPG transport plan may increase this issue</li> <li>Some rural transport routes pick up a number of service users from a wide catchment area making billing for the service potentially unfair due to extra distances travelled</li> </ul>
	<ul style="list-style-type: none"> <li>'Flat rate' cost favours those living further away from services and facilities but could affect those who only travel short distances</li> </ul>	<ul style="list-style-type: none"> <li>Those who live close to a service or facility could potentially be paying a large amount for a short trip</li> <li>People may choose private companies for this, service could then potentially become expensive to run with falling numbers using it</li> </ul>
	<ul style="list-style-type: none"> <li>People may stop using transport services, people become isolated, have no social interaction</li> </ul>	<ul style="list-style-type: none"> <li>Detrimental effect on service users, could impact on increased need for health and social care services</li> <li>For some Day Care transport is the one visit during the week to their house. This can be the first alarm for many if something is wrong.</li> <li>Services could be affected with falling numbers due to increased transport costs and rising costs of attendance leading to closure. Again leading to a detrimental effect on the user.</li> </ul>
	<ul style="list-style-type: none"> <li>Current DLA contributions</li> </ul>	<ul style="list-style-type: none"> <li>Some service users have identified that even the current DLA money is not enough to cover specially modified vehicles or current journeys</li> <li>Staff identified that DLA may not be here by 2017. This may increase the financial burden on the local authority to provide this</li> </ul>
	<ul style="list-style-type: none"> <li>Current service provision/ internal issues</li> </ul>	<ul style="list-style-type: none"> <li>The transport setup is not managed well – there are numerous different taxi firms, bus companies, private cars etc. All seem to be able to charge what they want. Journeys are not shared where there is scope to do so.</li> <li>Transport currently do not work with social care about transport issues to look at solutions</li> </ul>

	<ul style="list-style-type: none"> <li>• It is thought that 90% of clients are currently not financially assessed for transport. A Personal Budget for a £16 per week on travel would generate more work</li> <li>• There is a perceived need that more transport contracts should be better negotiated to provide a fairer price</li> </ul>
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Suggestions from the consultation

- Partnership work between Transport and Social Care to investigate solutions
- A public house in Colwell has a hire car facility outside of it which can be accessed with a PIN number; could this be trailed elsewhere?
- Personal Budgets could be used by groups to pay for transport - short journeys would be cheaper by taxi (especially if shared). The Council would be left to fund only long journeys

	Risk	Further Effect
<b>Affected service</b>		
<b>Carers services</b>	<ul style="list-style-type: none"> <li>• The cost to the Carer may mean they cannot afford valuable time away</li> </ul>	<ul style="list-style-type: none"> <li>• Carers may ignore their own health if these charges are implemented having a detrimental affect on the health of carer and cared for – increased costs to services</li> <li>• Carers may become socially isolated, again given the rural demographics of Herefordshire</li> <li>• Carer may lose employment and valuable income to take up full time caring role</li> <li>• Family relationships may get strained without respite breaks which could be detrimental to both the carer and the cared for</li> </ul>
	<ul style="list-style-type: none"> <li>• Carers may stop the caring role they provide</li> </ul>	<ul style="list-style-type: none"> <li>• Potentially large increase in service and numbers of assessments which would put more pressure on finances</li> </ul>
	<ul style="list-style-type: none"> <li>• Concern about costs to implement proposal</li> </ul>	<ul style="list-style-type: none"> <li>• Cost for assessment with many carers being nil charge payers may not match forecasts for recovery</li> </ul>

Suggestions from the consultation

- Some carers suggested that a cost of £5- £6 per hour may be a more appropriate charge
- Suggestion that perhaps instead of payments a voucher scheme may be able to be adopted
- Suggestion that both the carer and the person being cared for need to be looked at together as a package, not individually. There is currently a potential in the system for double payments.

	Risk	Further Effect
<b>Affected Service</b>		
<b>Day Care</b>	<ul style="list-style-type: none"> <li>• People can no longer afford Day Care</li> </ul>	<ul style="list-style-type: none"> <li>• Social interaction will be lost. For many attending this is an important service. People will become isolated. Potential increase in ill health and services required</li> <li>• For a carer or cared for valuable respite time will be lost. Family relationships could be strained affecting the carer and cared for</li> <li>• For rural service users the day centre may well be the only service available in local area</li> <li>• More pressure on services that provide care at home without attendance at a Day Centre</li> </ul>
	<ul style="list-style-type: none"> <li>• Service uptake decreases due to increased costs</li> </ul>	<ul style="list-style-type: none"> <li>• Currently the private market is not mature enough to provide a variety of services lost</li> <li>• Possible closure Day Care would mean a loss of what is seen as a valuable service to some</li> <li>• Increased travel costs and subsidies to attendee's if Day Care centres close locally and service users are forced to go elsewhere for service provision</li> </ul>

#### Suggestions from the consultation

- Many commented that they do not see Day Care as 'Care'. Many go for the social interaction, meal and activities. It has been suggested that perhaps this be rebranded and another separate service be created at a realistic, affordable cost.
- Comments received that if the FACS criteria for day care attendance was at a lower threshold potential attendance could increase and make it more financially viable. This suggestion could be considered with the previous suggestion above

	Risk	Further Effect
<b>Affected Service</b>		
<b>Meals</b>	<ul style="list-style-type: none"> <li>Vulnerable service users may discontinue service if costs increase</li> </ul>	<ul style="list-style-type: none"> <li>For some this service may be their only access to a healthy, nutritious and balanced meal. This may lead to an increased risk of ill health leading to further pressures on health and social care services</li> </ul>
	<ul style="list-style-type: none"> <li>Increased risk of ill health and injury to service users currently unable to manage food preparation themselves</li> </ul>	<ul style="list-style-type: none"> <li>Risk of ill health and / or injury posed to those who currently cannot prepare food safely</li> </ul>

#### Suggestions from the consultation

- There is a perception that there is a high price is due to the monopoly over the service. It was feedback that there needs to be more choice and a competitive market

	Risk	Further Effect
<b>Affected Service</b>		
<b>Homecare</b>	<ul style="list-style-type: none"> <li>Vulnerable service users may discontinue service if costs increase</li> </ul>	<ul style="list-style-type: none"> <li>This is a nominal risk across the county as there is no increase in urban areas</li> <li>Can be seen as discriminatory to those living in Rural areas or further away from current services</li> </ul>
	<ul style="list-style-type: none"> <li>Many currently feel Homecare provision in the county varies in quality</li> </ul>	<ul style="list-style-type: none"> <li>Vulnerable service users may discontinue service if costs increase (see above)</li> </ul>

- **N.B It was suggested that charging a higher rate in rural areas will not make a difference as the majority of people are not full payers anyway.**

Suggestions from the consultation

- Commissioners need to look at other agencies and the market place to pay directly to get better rates and service

Affected service	Risk	Further effect
Supported employment	<ul style="list-style-type: none"> <li>• Vulnerable service users may discontinue service if charge is implemented</li> </ul>	<ul style="list-style-type: none"> <li>• This is a nominal risk, currently the service user base using these services meet the higher end of the FACS criteria and by there very nature would have little or no financial savings to make them chargeable.</li> <li>• There is a significant duty of care for this service user base. Any charges imposed could be seen as discriminatory</li> </ul>

Suggestions from the consultation

- It was suggested that options such as looking at the empty shops within the city centre and seeing if these could be used by various groups of people to fill them with purpose? These spaces could be used creatively to provide new businesses and enterprises.
- Currently there are only two sponsored initiatives for this kind of service. But there are some very successful ones around the county, perhaps more partnership working could identify additional opportunities.

## 8. Recommendations

### 8.1 Changes

In the survey three proposals in particular received a particularly negative response with 70% plus stating opposition. These were:

- The proposal to increase transport costs from £1.35 to £15.25
- The proposal to introduce charges for carer' services
- The proposal to increase day care costs

### 8.2 Monitoring

The implementation of any or all of the proposals to charge will require monitoring through:

- Individual Reviews
- Financial Assessments
- Complaints
- Significant decrease in service provision