



Equality Impact Assessment (EIA) Form

1. Service Area/Directorate

Name of Head of Service for activity being assessed: Claire Monteith
 Directorate: Community Wellbeing
 Name of lead person for this activity: Jeanette Young
 Individual(s) completing this assessment: Jeanette Young & Helen Morgan
 Date assessment completed: 29/01/2026

2. What is being assessed

Activity being assessed (eg. policy, procedure, budget, service redesign, strategy etc.)

Proposal to cap direct payments at average residential cost

What is the aim, purpose, or intended outcome of this activity?

Improve equity across the system and ensure effective use of council resources to support people

Who will be affected by the development and implementation of this activity?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Service users | <input type="checkbox"/> Visitors to the county |
| <input checked="" type="checkbox"/> Communities | <input type="checkbox"/> Carers |
| <input type="checkbox"/> Children | <input type="checkbox"/> Patients |
| <input type="checkbox"/> All staff | <input type="checkbox"/> All part-time staff |
| <input type="checkbox"/> Staff at a particular location | <input checked="" type="checkbox"/> Other: Care providers |

Is this:

- Review of an existing activity/policy
 New activity/policy
 Planning to withdraw or reduce a service, activity or presence?

3. Background information and findings

What information and evidence have you reviewed to help inform this assessment? (name your sources, eg. demographic information, usage data, Census data, feedback, complaints, audits, research)

Demographic and usage data

Summary of engagement or consultation undertaken (eg. who you've engaged with, and how, or why do you believe this is not required)

Finance, ASC HoS, Service Director Commissioning, Corporate Director and lead member for CWD

Summary of relevant findings (it is possible that you will have gaps in your evidence. You must decide whether you need to fill in the gaps now, and if it is feasible to do so. It might be that collecting robust information forms part of your action plan below)

The evidence showed an inequitable approach using our current policy and a high level of clawbacks – therefore we need to resolve this inequitably by introducing a new fairer approach and reduce the admin burden of clawbacks.

4. The Public Sector Equality Duty

Will this activity have a positive, neutral or negative impact on our duty to:

Equality Duty	Positive	Neutral	Negative
Eliminate unlawful discrimination, harassment, victimisation?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Advance equality of opportunity between different groups?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Foster good relations between different groups?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Explain your rationale here, and include any ways in which you could strengthen the capacity of this activity to promote equality (remember to add anything relevant into your action planning below)

Introducing a fairness approach across all new direct payments and ongoing review of existing packages would reduce the inequality of allocation of funds. A consistent approach would ensure that budgets are equitably agreed based on the same criteria regardless of location or individual's inclusion in any of the defined groups.

5. The impact of this activity

Consider the potential impact of this activity on each of the equality groups outlined below and explain your rationale. Please note it is possible for the potential impact to be both positive and negative within the same equality group. Remember to consider the impact on staff and service users (current and potential) and partner organisations. It may be useful to include data within these sections if you know the diversity make-up of the people likely to be affected.

Equality Group	Potential positive impact	Potential neutral impact	Potential negative impact	Rationale
Age (include safeguarding, consent and child welfare)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Modelling of adults currently paid above the new criteria indicates that the majority fall into the 26-35 and 66+ age brackets. The positive impact will be fairness and equitability of allocation of funds against needs. Some people might have changes in their packages when assessed.
Disability (consider attitudinal, physical, financial and social barriers, neuro-diversity, learning disability, physical and sensory impairment)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The positive impact will be fairness and equitability of allocation of funds against needs. Some people might have changes in their packages when assessed.
Gender Reassignment (include gender identity, and consider privacy of data and harassment)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The positive impact will be fairness and equitability of allocation of funds against needs. Some people might have changes in their packages when assessed.
Marriage & Civil Partnerships	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The positive impact will be fairness and equitability of allocation of funds against needs. Some people might have changes in their packages when assessed..
Pregnancy & Maternity (consider working arrangements, part-time working, infant caring responsibilities)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The positive impact will be fairness and equitability of allocation of funds against needs. Some people might have changes in their packages when assessed.
Race (including Travelling Communities and people of other nationalities)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The positive impact will be fairness and equitability of allocation of funds against needs. Some people might have changes in their packages when assessed.
Religion & Belief	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The positive impact will be fairness and equitability of allocation of funds against needs. Some people might have changes in their packages when assessed.

Equality Group	Potential positive impact	Potential neutral impact	Potential negative impact	Rationale
Sex (consider issues of safety, sexual violence, part-time work, and single-sex provision – especially in light of the legal definition of “sex”)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The positive impact will be fairness and equitability of allocation of funds against needs. Some people might have changes in their packages when assessed.
Sexual Orientation	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The positive impact will be fairness and equitability of allocation of funds against needs. Some people might have changes in their packages when assessed.
Others: carers, care leavers, homeless, social/economic deprivation (consider shift-patterns, caring responsibilities)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The positive impact will be fairness and equitability of allocation of funds against needs. Some people might have changes in their packages when assessed.
Health Inequalities (any preventable, unfair & unjust differences in health status between groups, populations or individuals that arise from unequal distribution of social, environmental & economic conditions)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The positive impact will be fairness and equitability of allocation of funds against needs.

Where a negative impact on any of the equality groups is realised after the implementation of the activity, the activity lead will seek to minimise the impact and carry out a full review of this EIA.

6. Action planning

What actions will you take as a result of this impact assessment? (you will need to include actions to mitigate any potential negative impacts)

Potential negative impact	What action will be taken	Who will lead	Timeframe
Individuals may struggle to negotiate rates or source alternative providers	Ensure access to independent advice. Build robust procurement support into DPSS contract and work with providers to accept rates		
Individuals may reduce care provision resulting in unmet needs	This will only occur if their needs have changed		
All	Establish an appeals process		

7. Monitoring and review

How will you monitor these actions?

Workstreams will be established for each action. These workstreams will be monitored using project management tools. Account monitoring will be conducted at 3 month intervals for the first 9 months for any capped direct payments to ensure that potential service reductions are identified quickly and prevent unmet needs.

When will you review this EIA?

To be amended throughout mobilisation and reviewed in 3 months following receipt of initial feedback and monitoring.

8. Equality Statement

- All public bodies have a statutory duty under the Equality Act 2010 to give due regard to how they can improve society and promote equality in every aspect of their day-to-day business. This means that they must consider, and keep reviewing, how they are promoting equality in decision-making, policies, services, procurement, staff recruitment and management.
- Herefordshire Council will challenge discrimination, promote equality, respect human rights, and design and implement services, policies and measures that meet the diverse needs of our population, ensuring that none are placed at a disadvantage over others.

Signature of person completing EIA

A rectangular box containing a handwritten signature in black ink. The signature is cursive and appears to read 'E. Mantle'.

Date signed

29/01/2026

9. Make this EIA available (and delete this section)

- Attach your EIA as an appendix to any decision reports so that decision-makers have all the equality data they need in order to make robust and fair decisions.
- Upload your EIA to the shared Teams site: [Equality Impact Assessment | General | Microsoft Teams](#)
- Staff, trade unions, service users or members of the public may want to see this EIA, so it must be published on our website along with the decision report.