

Equality Impact Assessment and Action Plan Of Non Residential Fairer Contributions Policy

Review date	April 2012
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Full Equality Assessment

Non Residential Fairer Contributions Policy 2011-15

This Equality Impact Assessment (EIA) will investigate the proposals for changes to non residential charging (Fairer Contributions). It will also include the changes to the Home Meal Service, as well as incorporating the proposed changes to the Taxicard scheme. The proposals for changes to non residential charging are subject to agreement by Members at Cabinet on 12 July 2011.

Background – Fairer Contributions for Non-residential care

Currently, the London Borough of Barking and Dagenham (LBBD) charge for home care, home meals and community equipment but not for all non-residential social care services. The charging policy for home care was introduced in 1999 with a flat rate of £10 regardless of service levels and income. In a report to Executive on 11 March 2003 Members approved a new banded system for home care. Charges were split into three bands based on level of care. However, the banded system has proved, with time, to be unfair as costs discriminate against people who receive lower levels of service.

The Department of Health has issued new guidance on developing a contributions policy which meets the challenges of personalisation. The key themes of the Fairer Contributions guidance are:

- Charges should not be levied for any one service in isolation but for packages of care.
- Councils have discretion not to charge for services at all or to charge for services selectively. This will result in a reduction of the person's personal budget.
- Non personal budget holders should not be treated less favourably than personal budget holders.
- No one should be expected to contribute any more than the financial assessment shows is reasonably practical for them to pay.
- Consideration for charging is not purely budget based, but takes into account service needs.

Proposed changes

The proposed changes to the current system will address:

- The introduction of a £5 waiver
- Changes to levels of disability disregard considered in the income calculations
- Building in an additional £10 allowance for people aged 85 and over
- Not levying a charge on savings between £14,250 and £23,250
- Introducing transitional protection over three years.

The following services will be subjected to a new Fairer Contributions policy:

- Home care
- Personal support
- Personal care
- Day care
- Transport
- Services previously funded under Supporting People where they form part of a care package

Background – Home Meal Service

Alongside the proposed changes to the charging policy for the services above, the contributions towards the Home Meal Service have also been considered. The Home Meal Service is what was previously known as 'Meals on Wheels'. It is a service that delivers meals to individuals at home who are unable to purchase or prepare their own meals.

The Adult Commissioning team had a contract with one provider (Fresh Community Meals) to provide this service. The process involved, in short:

- A member of the social services team identified a resident's need for the service ensuring that they meet the eligibility criteria
- Inform and advise the resident on the service
- Arrange with the provider to start the service

The contracted service provided a hot lunch time meal seven days a week, 52 weeks a year between 11.30am and 2.00pm. This is a very fixed timeframe which does not support a choice agenda. All users of this service contributed £3.45 towards the cost of the meal (including preparation and delivery costs). The Council subsidised a significant amount of the actual cost of the meal in addition to the service user's contribution. Between 4 April 2011 and 31 May 2011 the amount service users contribute towards the cost of the meal rose by £1.50 from £3.45 to £4.95. This uplift was agreed by Cabinet in December 2010.

Proposed changes

- From 1 June 2011 onwards service users will fund the entire cost of meals from a provider of their choosing.
- Service users have an approved list to choose from. This includes providers of services that are similar to the current home meals service as well as local cafes and food outlets who deliver which the council has worked with on the nutritional content of their meals.
- There are opportunities for local social enterprises and small voluntary sector providers as well as supermarket chains in the borough to join the list of home meal options for service users

Background – Taxicard

Taxicard is a scheme that provides subsidised door to door transport for people who have serious mobility impairment and difficulty in using public transport. The scheme was growing in popularity but is unsustainable at the current levels of growth and charges (the Taxicard charge for service users has previously not increased for 15 years).

The Taxicard scheme had just under 5,000 members. This consists of applicants who range in age from two years old to 100+ years old.

Trip limits are given according to mobility needs and are allocated on the 1 April each year with no roll over:

- **Band A** - 120 trips for people who need total door to door service
- **Band B** - 60 trips for people who can drive themselves but on some occasions need door to door transport because they are unable or unfit to drive
- **Band C** - 36 trips these are given to people who can on some occasions use public transport but other times need door to door because of their medical condition

Cost of trips were £1.50 to the customer, so the Council subsidised the trip by £10.30. If the journey goes over £11.80 on the meter the customer paid the difference or they had the option of double swiping the card and this journey comes off their trip allocation.

Changes implemented in April 2011

- An increase in the minimum customer contribution to £2.50
- A reduction of the maximum trip subsidy by £2.00 per trip
- To end double swiping*
- Members currently on a trip limit of 120 per year will receive 104 trips per year from 1 April 2011
- No change to the trip limits of those members currently on 36 or 60 trips per year.

*Double swiping allows for a return journey with another subsidy from the Council.

Intended outcomes from the proposals

- Develop a new charging policy to enable the continued provision of services to the most vulnerable people in the borough.
- Deliver a fairer, more equitable charging policy in line with current Department of Health guidance
- Take into account level of income and protect the most vulnerable residents in the borough
- Encourage more choice and control for the borough's service users in line with personalisation
- Deliver year on year savings set out in the budget setting process.

Name and job title of people involved in this Equality impact assessment

Karen Ahmed – Divisional Director Adult Commissioning
Anne Bristow – Corporate Director of Adult and Community Services
Kevin Jeram – Group Accountant, Adult and Community Services
Jim Popkin – Performance Manager, Outreach - Elevate
Paul Hodson – Group Manager, Community Cohesion
Teresa Coe – System and Policy Manager
Debbie German - Manager Mobility Services
Stuart Whitaker- Customer Quality Assurance Advisor

Equalities profile of users within the service/ function which is being assessed.

The proposed changes for consultation to non-residential charging will have an impact on approximately 600 service users.
The changes to Home Meal Service subsidy impact on 175 service users.
The changes to the Taxicard scheme affect up to 5,000 current members.

Give details of any consultation that has already been done which is relevant to this policy/service/function in relation to the groups below

Fairer Contributions

The proposed changes to the Fairer Contributions policy affect approximately 600 people. It was therefore necessary to consult as widely as possible on the new proposals following Cabinet agreement to proceed on 15 March 2011. The consultation opened in the beginning of April and closed on 31 May.

Postal questionnaires were sent to 1,900 current service users who may be affected. 1,000 members of the Local Involvement Network (LINKs) were also sent the questionnaire. The questionnaire was available on the Council's website through a special questionnaire portal. An article in 'The News' referenced the consultation.

The questionnaire was open to service users, carers and residents. The breakdown of the 460 respondents is tabulated below:

	% Answer	Count
Service user	53.26%	245
Carer	11.52%	53
Other	13.04%	60
No response	22.17%	102
Total	100.00%	460

The Council also consulted directly with the following groups:

- Disabili

ty Equality Forum

- Carers Networking Group

- Practitioners Forum
- Personalisation Customer Reference Group
- Advisory Partners
- Carers Coffee Morning

The Forum for the Elderly was also involved in the discussion around social care funding.

Appointment sessions were offered so residents could discuss with staff, including a member of the Financial Assessment team, how the proposals would affect them. This was not popular with only two people taking up this option. More popular was an option for a member of Council staff to visit the resident's home to help them fill in the form. This option was taken up by 13 residents. The Council also responded to resident's queries over the phone.

Health and Adult Social Care Select Committee considered the proposals on 20 April 2011. The Select Committee commented that the non-residential charging policy had not been updated over many years and the new proposals to be overdue but were fair and justified.

The consultation process highlighted a difference in response between the consultation meetings with individuals, organisations and representatives of carers, service users and local residents, and the questionnaires. When people had the opportunity to discuss the proposals, the rationale behind them and the impact on their individual circumstances, there was a broader acceptance of the proposals. Furthermore, there was support for the various protections offered to people on lower incomes and our older residents.

However, this EIA considers the questionnaire responses as well as the feedback from meetings, forums and visits. It must also be noted that further consultation took place with questionnaire respondents to explore why they had commented on some of the proposals in the way that they had. Where further explanation was given, over half of respondents who had responded negatively the first time, changed their mind.

Home Meal Service

At 1 April 2011, 175 service users were accessing the home meals service. When considering making changes to the service in December 2010, the Adult Commissioning team conducted a telephone survey with a sample size of 40 people. Results showed that:

- The vast majority of people would prefer their main meal to remain at lunch time
- Nearly all would still buy the meals if the price went up
- Nearly all would consider paying more from a different provider
- Around 60% did not feel able to prepare a frozen meal without assistance.

Qualitative comments were also noted. An annual survey is sent to all customers each year to gain their feedback on the service. The Review and

Evaluation team have ensured that customers received a review and reassessment before the new options were introduced on 1 June.

Taxicard

A letter was sent to all 5,000 users detailing/explaining changes in December 2010. On 27 January 2011 Debbie German, Manager Mobility Services, and Stuart Whitaker, Customer Quality Assurance Advisor, attended the Forum for the Elderly held at the Civic Centre, giving a briefing on changes to the Taxicard scheme in the borough.

SECTION 1 - What does the evidence tell us? – to what extent does the policy /service/function affect the **promotion of equality and the **elimination of discrimination** in each of the equality groups below**

Age

The Fairer Contributions Policy proposals will have an impact on the borough's elderly population. For instance, 78% of home care users are aged over 65. 40% are over 85. Of the 460 respondents to the questionnaire, the age breakdown is tabulated below, also including the breakdown of those who identified themselves as service users:

Age	% Answer (Total)	% Count (Total)	% Answer (Service Users)	% Answer (Service Users)
18-24	1.09%	5	1.22%	3
25-34	3.26%	15	4.49%	11
35-44	7.17%	33	8.16%	20
45-54	10.65%	49	14.29%	35
55-64	9.13%	42	12.65%	31
65-74	10%	46	9.39%	23
75-84	17.83%	82	17.55%	43
85-94	29.35%	135	22.45%	55
94+	3.91%	18	3.67%	9
No response	7.61%	35	6.12%	15
Total	100.00%	460	100.00%	245

The respondents age grouping show a slight under representation of views from older service users. The responses suggest, because of the disproportionate impact on older people, that measures should be in place to protect the elderly. These measures are discussed in Section 2.

The changes to the Taxicard scheme were well received by the members of the Forum for the Elderly who generally accepted that changes have to be

made as a result of TfL capping spending on the scheme. During the briefing, alternative methods of transport that are available to elderly people were described and the relevant contact details included, as well as the contact details of the Mobility Services Team.

After the briefing an opportunity was given to the audience to ask any questions they might have regarding the changes or about the scheme in general. A number of questions were asked which focused on;

- Qualification requirements for the Taxicard
- Explanation on how the subsidy works
- Ways in which to utilise the Taxicard

Since the session, the Mobility Team has not experienced an increase in the volume of calls received, the total number remaining constant with previous months. Customers that have contacted the Mobility Team have commented positively on the alternative modes of transport/methods of utilising their Taxicard which were highlighted during the Forum for the Elderly. Customers have been most interested in the Patient Transport Service, an NHS run service which transports patients to and from their hospital appointments, and Dial-A-Ride, both of which are free services.

The majority of our 175 Home Meal service users are aged over 65 (95%). Indeed, over 50% are aged over 85. Therefore, any changes will have a disproportionate impact on the borough's ageing population. The Council has ensured that people still receive the meals and other services they require to meet their needs. The Council's Review and Evaluation team has contacted the service users affected to inform them of the changes and ensured they have signed up to one of the new options.

Disability

Both the changes to the Taxicard scheme and to non-residential charging will affect people with disabilities in the borough disproportionately. In particular the changes to disability disregard and the inclusion of Severe Disability Premium/Allowance will impact on people with disabilities despite the levels of protection that will be put in place. We consulted with the Disability Forum, Learning Disability Partnership Board, Carers groups and the Advisory Partners. The Fairer Contributions consultation document was edited to ensure it was in 'easy read'.

Of those who responded to the Fairer Contributions questionnaire, 402 (87.39%) had a disability of some description.

No. of Disabilities listed	% Answer	Count
One disability	28.26%	130
Two disabilities	24.57%	113
Three disabilities	18.7%	86

Four disabilities	11.3%	52
Five disabilities	4.57%	21
No disability/No response	12.6%	58
Total	100.00%	460

Of those with four or more disabilities (73):

- 22 (30.1%) felt charging for all community based services was fair
- 34 (46.5%) felt charging for all community based services was not fair
- 14 (19.2%) did not know
- 3 (4.1%) did not answer

This Impact Assessment has looked specifically at the answers of those who stated they had learning disabilities (62 people):

Question 1 - We want to include all of the Severe Disability Premium and 75% of disability related benefits in working out how much you can afford to pay.

Total	Yes	No	Don't Know	No response
62	9 (14.5%)	29 (36.8%)	18 (29%)	7 (11.3%)

Question 2 - Government guidance says that we should ask for a contribution towards all services. At the moment we only ask for a payment towards home care.

Total	Yes	No	Don't Know	No response
62	20 (32.3%)	28 (45.2%)	11 (17.7%)	3 (4.8%)

The evidence from the questionnaire responses and the forums we consulted with tell us that the policy impacts too much on those with high levels of disability. Therefore, an extra protection measure should be introduced to protect those receiving Disability Living Allowance Higher or Attendance Allowance Higher. This measure is introduced in Section 2.

Ethnicity

Below is the ethnicity profile of the 1,100 service users who may be affected by the new Fairer Contributions proposals with the ethnicity of the questionnaire respondents in brackets :

Asian or Asian British:	3.6%	(4.35%)
Black or Black British:	5.9%	(8.04%)
Chinese or other ethnic group:	0.7%	(0.43%)
White British:	84.6%	(78.7%)
Other White:	3.7%	(1.74%)
Mixed or Mixed British:	1.5%	(2.17%)

The figures above show 84.6% of home care users are white British. This

compares with only 56.4% (LBBB Experimental Ethnic Estimates: Community Mapping Nov 2010) of all borough residents being white British. However, the ethnic profile of the respondents is similar to the overall ethnicity of current service users as described above. There is a slight underrepresentation of white British respondents as opposed to actual service users. Over 15% of service users are from an ethnic minority. Therefore, the Council ensured that the consultation was in an accessible format. It is important that service users, where English is not their first language, are able to understand the implications of the proposals. Help was available to go through the proposals through a personal visit, a telephone call or a surgery. The proposals and questionnaire were distributed to the BAME Forum on 27 April. The Council's BME Support Officer was available to help clarify the questions. She also visited the Gurdwara where she helped respondents complete the form.

Gender (including transgender)

Below is the gender profile compared with age of the 1,100 service users who may be affected by the new Fairer Contributions proposals:

Age	Male	Female
18 - 24	0.4%	0.1%
25 - 39	2.1%	1%
40 - 64	6.8%	7.8%
65 - 74	4.6%	6.7%
75 - 84	6.2%	16.8%
85 - 94	5.9%	27.8%
95+	0.6%	5.5%

The table shows the disproportionate impact on elderly women. Over 50% of service users affected are women aged 75 and over. 268 (58.3%) respondents stated that they were female and 152 were aged over 75. Of the 152, 55 (36.2%) thought introducing charging for all non-residential services was fair and 53 (34.9%) thought that it was not fair. This compares with the overall figure from all respondents of 161 (35%) thinking introducing charging for all non residential services was fair and 200 (43.5%) believing it is unfair.

While it is important to recognise and monitor the impact on elderly women, the policy should be consistent across genders.

Religion or belief

The movement of service users to personal budgets allows the budget holders to have greater choice and control. The budget holder can, for instance, purchase culturally specific forms of support including those in keeping with the individual's faith. These approaches may not be part of the general offer but are necessary to meet individual outcomes. Therefore, the personalised approach to social care encourages choice and control which may include culturally specific services not delivered by mainstream providers.

Regarding home meals, culturally specific and faith appropriate meals are provided by most of the new menu of options. More details can be found in section 2.

Consultation documents on non-residential charging include faith monitoring which is detailed below:

Faith	% Answer	Count
Christian	78.26%	360
Muslim	3.26%	15
Sikh	1.3%	6
Hindu	0.65%	3
Jewish	0.22%	1
No faith	6.52%	30
Others	1.74%	8
No response	8.04%	37
Total	100.00%	460

Sexual orientation

No specific implications

Pregnant and Nursing mothers

No specific implications

How could this policy /service/ function reduce socio-economic disadvantage for all groups?

The proposals will mean more people are contributing towards their care or paying higher amounts for their care, Taxicard journeys and Home Meal Service. We have consulted widely on the proposals and the levels of protection we are offering.

Careful modelling has been completed on the proposals for service users to ensure they still have enough money to live on. Extra protection measures have been built in to protect the borough's most vulnerable such as raising the minimum payment to £5, only taking up to 75% of disposable income and introducing transitional protection.

How does the policy/service/function contribute to building Community Cohesion?)

The Council has worked with local providers to introduce a new way of providing community meals. This includes liaising with a social enterprise who have agreed to be included in the list of options for service users. A social enterprise is a business with primarily social objectives whose surpluses are reinvested for that purpose in the business or the community, rather than being driven by the need to maximise profit for shareholders and owners. The promotion of social enterprises should have positive impacts on the community.

The Fairer Contributions proposals, in general however, could have implications for community cohesion in the way that the charges will mean that there is no financial incentive to use day centres. Service users and carers would have more choices because of personal budgets and people may choose to engage in more community based activities thereby increasing the opportunities for developing local friendships and raising the visibility of disabled people within the local community.

Given all the information that you have gathered in the previous sections how will or how does the Policy/Service /Function meet the needs of individuals from different groups?

The impact of the changes in charging policy for home care users has been analysed extensively. The impact of the proposed changes has been modelled for the 922 home care users financially assessed before 3 November 2010. The impact has been modelled again following the consultation for the 987 home care users financially assessed before 1 June 2011. This includes current home care users who are not currently charged but will be if the proposed changes are implemented following consultation. The impact on other service users such day care users and people funded through Supporting People was included in the report for Cabinet on 15 March and the revised policy for 12 July. It is impossible to predict as accurately the impact on these service users and new service users because these people have not all been financially assessed. Instead, the trends from the home care user analysis has been used to gather indicative numbers affected by the proposals:

- 53% (583) of people will get free services or pay less
 - 575 (52%) service users will still receive free services
 - 15 (1%) will pay less than they pay now
- 5% (51) of people will pay the same
- 41% (451) of people will pay for the first time or pay more.

The number affected by this policy will fluctuate as people enter and leave the services affected. New service users (after 1 October) will not be protected by transitional protection but will be subject to the other protection measures to ensure they have enough disposable income to live on.

Age

Council Members and Officers are very aware of the impact any proposed

changes have on the ageing population as they are more likely to be receiving services that will be charged for. For instance, over one third of home care users are aged over 85. As an additional protection measure for this group, it was proposed that we increase the Minimum Income Guarantee for all service users aged 85 and over by £10. This means over 85s will have a Minimum Guaranteed Income of £181.68 giving them higher disposable income. Of the 111 people who answered the questionnaire aged 85 and over, only 9 (8.1%) thought this proposal was not fair. Overall 342 (74.4%) of respondents thought this additional protection measure was fair and 53 (11.52%) thought it was not fair. It is recommended that this additional protection measure remains in place to help assist elderly residents in the borough.

The national guidance ensures that people aged 60 and over have a higher minimum income of £171.68. Therefore any income below that amount will not be touched by this charging policy.

The increase in charge of the Taxicard scheme will also have an impact on 88% of Taxicard holders who are aged over 65. The majority of the Taxicard users above are also in receipt of non-residential services. The built in protection for older people with non-residential care means that all Taxicard holders should have enough disposable income to fund these changes. It must also be noted that the majority of Taxicard users only use their Taxicard in emergencies – just once or twice a year. However, the new proposals will be reviewed this summer to monitor the impact of the proposals introduced in April.

Disability

In the proposed Fairer Contributions policy, including Severe Disability Premium in income calculations, will mean that an estimated additional 177 service users will have to pay a contribution towards the cost of their personal budget or care package (as calculated in November 2010). This is because their Net Disposable Income, including Severe Disability Premium would then be calculated as being above the income support level + 25%.

The proposal to reduce the level of disability disregard to 25% of disability related benefits means an additional 167 people would become eligible to make a contribution towards the cost of their care package or personal budget. In total 344 people may be affected by changes to the treatment of disability benefits.

The consultation has revealed of the 402 people who responded to the questionnaire with at least one disability, 118 (29.4%) thought it was fair to reduce the levels of disability disregard to 25%. 173 (43%) thought it was unfair.

Because of this impact on people with disabilities in the borough and the responses received, it is proposed that an extra protection measure is added to those who receive the higher rates of DLA and AA. Instead, 65% of DLA and AA will be considered in income calculations.

Disability Related Benefit	Level	2011/12 benefit level	March 15 proposal	Revised proposal	Income not chargeable
Disability Living Allowance	Higher	£73.60	£55.20	£47.84	£25.76
	Medium	£49.30	£36.98	£36.98	£12.32
	Lower	£19.55	£14.66	£14.66	£4.89
Attendance Allowance	Higher	£73.60	£55.20	£47.84	£25.76
	Lower	£49.30	£36.98	£36.98	£12.32

This revised proposal will effectively give an extra £7.36 in weekly protection to the borough's most vulnerable service users. 61 people will not be charged because of the movement of DLA/AA Higher from 75% disregard to 65%.

It is proposed that the other protection measures remain:

- Only 75% of net disposable income can be charged
- People will be protected by large increases in the chargeable amount by introducing transitional protection of a maximum £10 weekly increase from October 2011 and £20 increase in April 2012.

This will in particular protect new payers who visit day centres and currently pay nothing for this service. It is anticipated that 54 current day care users will also be expected to start contributing if the proposals are implemented. The 54 day care users will all be protected by the transitional protection.

Despite the aforementioned protective measures in place, disabled people in the borough are going to be expected to pay more across a range of services. The majority of Taxicard users have mobility problems and are going to be expected to pay more for their journeys. If they have home meals as well it is likely that they will pay more for their meals (though they may find cheaper alternatives). The increase in charge for Blue Badge holders from £2 to £10 owing to the design changing must also be considered. The Blue Badge scheme is for people with severe mobility problems. It allows Blue Badge holders to park close to where they need to go. Though the Blue Badge lasts for three years, the increases in costs for disabled people in the borough add up.

The Council will continue to consult with disabled people and undertake regular financial assessments to ensure they have enough disposable income despite the increase in charges and costs. In extreme cases of hardship, service charges can be waived at the discretion of the Corporate Director.

Race/Ethnicity

The Council will ensure all service users, including the 15% of ethnic minority service users affected by the Fairer Contributions proposals, clearly understand the benefits they are entitled to when they are financially

assessed. The numbers of ethnic minority residents is increasing as shown by the latest estimates of percentage of people in ethnic groups (LBBD Experimental Ethnic Estimates: Community Mapping Nov 2010):

White: 67.2%
British/Irish 56.4%
Other 10.8%
Asian or Asian British: 14.4%
Indian 4.1%
Pakistani 5.4%
Bangladeshi 3.0%
Other Asian 1.9%
Black or Black British: 17.6%
Caribbean 1.9%
African 15.4%
Other black 0.3%
Chinese or Other Ethnic Group 0.9%
Chinese 0.4%
Other 0.5%

This is quite different from the ethnic profile of service users in the ethnicity part of section 1. It is likely that the ethnic profile of service users will change to move more in line with the borough ethnicity changes. It is essential that the financial assessment process is clear so all service users understand what benefits they are entitled to and how the Fairer Contributions Policy works.

The Council explored the option of providing culturally sensitive meals to the local community. Future service options ensure user's health and cultural meal needs are considered, for example by providing options that include Asian, Asian vegetarian and Afro Caribbean.

One of the most popular new options for Home Meal service users, Havering Catering Services, are able to cater for all dietary requirements. Only one of the home meals options listed on the leaflet, do not offer the full range of culturally specific meals. This is a sit down option where users enjoy the opportunity to socialise with others as they are eating.

Gender (including transgender)

The impact on elderly women is disproportionate to other genders as discussed above. Cases will be reviewed where there are particular cases of individual hardship.

Pregnant / Nursing Mothers

The impact on this group has not been analysed.

Religion or Belief

As stated above the new home meals service options will consider dietary requirements owing to religious belief including:

Kosher
Halal
Vegetarian

Home Meals options will offer choice and control for service users.

Sexual orientation

The impact on this group has not been analysed.

Socio-economic disadvantage

Service users will be paying more if the proposals for Fairer Contributions are implemented. However, all the proposals have attempted to ensure that service users are not too economically disadvantaged by the proposals. In particular, the following proposals seek to prevent socio-economic disadvantage by:

- Ensuring only 75% of net disposable income can be touched by any charging policy. This will mean that 14 people will actually pay less for their home care than they currently do under the banded system
- Introducing a minimum payment of £5 meaning that 34 service users on low income do not have to pay towards their home care
- Introducing transitional protection to protect service users from large payment increases
- Allowing home meal users to find cheaper alternatives rather than giving them no choice about their home meal provider
- Ensuring people are aware of other transport options other than the taxicard scheme, including the sharing of transport with other users.

Cases will be reviewed where there are particular cases of individual hardship with a possible reduction or waiver resulting. The impact of any proposals implemented, and the use of waivers, will be monitored and evaluated annually.

What more can be done?

Challenges and Opportunities

1) The Revenues and Benefits Team will be conducting a financial assessment on up to 1,100 service users. This will mean the most up-to-date financial information will be gathered on service users to ensure they pay the correct amount. This Financial Assessment will be updated annually for each service user so any changes in financial circumstances are picked up and people are still paying the right amount. The Financial Assessment will be accompanied by a welfare benefits check to maximise each individual's income.

2) What **practical changes** will help reduce any adverse or potential adverse impact on particular groups?
Extra resources may be acquired by Elevate to ensure they can manage the extra financial assessments that will be required as more people

become eligible to be charged. Extra resources may be also required to ensure people are given welfare benefits checks at the same time as financial assessments. This will be confirmed by the Project Implementation team.

3) What will be done to improve access to, and take-up of, services and understanding the policy?

Frontline workers will be briefed about the consultation. When a new policy is confirmed following decision by Cabinet, they will be briefed again. Social workers will therefore be in a position to assist with any queries and help with financial assessments if necessary. The new charging policy and Taxicard scheme will be explained on the borough's website.

What impact will the policy have on helping different groups of people to get on well together to improve community relations

Because the proposals remove any financial incentive to use day centres, people may begin to choose to engage in community based activities with personal support. This could raise the visibility of disabled people and enable people to develop relationships with people they previously would not have met.

Equality Impact Assessment

While these proposals are designed to increase income for the Council to sustain the current levels of service, they are also designed to be fair and equitable. Provision is to be made to ensure:

- The results of the consultation should be presented to Members at Cabinet in July 2011, including the raw data.
- Frontline staff to be aware of proposed changes to charges and understand the rationale behind it.
- The new financial systems (SWIFT Financials) need to be set up and tested.

Action plan template

Category	Actions	Target date	Person responsible and their Directorate
Improving Involvement and Consultation	Eight week consultation to take place from beginning of April 2011 to ask questions around the proposals concluding on 31 May 2011. The results of this consultation will go to Cabinet in July 2011.	July 2011	Divisional Director Adult Commissioning
Review of Taxicard proposals	Full review of impact of new proposals since 1 April	September 2011	Divisional Director Customer Strategy
Improving data collection and evidence	Financial Assessment of all non-residential service users will be carried out from April 2011.	September 2011	Project Manager Implementation Phase
	Welfare benefits checks will be offered and take up monitored.	September 2011	Project Manager Implementation Phase
Improving assessment and analysis of information	Payment system set up on SWIFT Financials	September 2011	Project Manager Implementation Phase
Developing procurement and partnerships arrangements to include equality objectives and targets within all aspects of the process (including monitoring of the contract / commission)	Monitor any drop off in service take-up because of the charges and ensure no equality group is adversely affected.	Annually	Divisional Director Adult Commissioning
How will you monitor evaluate and review this EIA (including publishing the results)	EIA updated following consultation and included in appendix for July Cabinet report. This will be published on the Council website.	July 2011	Divisional Director Adult Commissioning
	EIA to be reviewed annually, in line with review of policy.	April 2012	Divisional Director Adult Commissioning