

## EQUALITY IMPACT ASSESSMENT - TRAFFORD COUNCIL


<b>A. Summary Details</b>		
1	Title of EIA:	Adult Social Care Policy Charging, Debt and Disability Facilities Grant Changes
2	Person responsible for the assessment:	Diane Eaton – Corporate Director for Adult Services
3	Contact details:	Diane Eaton – 912 1901
4	Section & Directorate:	Children Families and Wellbeing
5	Name and roles of other officers involved in the EIA, if applicable:	Louise Shaw – Head of Exchequer Services Helen Machin – Assessments and Client Services Manager Anna Kemp – Adaptations Manager

<b>B. Policy or Function</b>		
1	Is this EIA for a policy or function?	<input checked="" type="checkbox"/> Policy <input type="checkbox"/> Function <input type="checkbox"/>
2	Is this EIA for a new or existing policy or function?	New <input type="checkbox"/> Existing <input type="checkbox"/> <input checked="" type="checkbox"/> Change to an existing policy or function <input type="checkbox"/>
3	What is the main purpose of the policy/function?	The Council aims to support people to remain at home and to be as independent as possible for as long as possible. It is important to support people to maximise their income and ensure we prevent debt from developing. Adults with care support needs contribute to their care in line with the Care Act 2014.

		<p>The Council's Adult Social Care Charging Policy details how the Council charges for care in line with legislation and guidance. The separate Debt Recovery (DR) policy explains the debt recovery cycle and how the Council will enforce unpaid debt recovery to ensure a consistent and transparent approach to debt recovery.</p> <p>The Council's Disabled Facilities Grant (DFG) application, means test and recovery processes are detailed in its Regulatory Reform Order (RRO) and includes eligibility criteria and spend limits.</p>
4	Is the policy/function associated with any other policies of the Authority?	<p>Client Services Policy Deferred Payment Policy</p>
5	Do any written procedures exist to enable delivery of this policy/function?	<p>Care and Support Statutory Guidance 2014 Charging for Care and Support Dept of Health Disability Related Expenditure (DRE) Guidance Deferred Payment Application Eligibility Criteria and Process Debt Recovery Process Interim Funding Process</p>
6	Are there elements of common practice not clearly defined within the written procedures? If yes, please state.	N/A
7	Who are the main stakeholders of the policy? How are they expected to benefit?	<p>Service users, family members, providers and advisory services will benefit from the amalgamation of the individual policies, clear DRE guidance and clear guidance relating to Third Party Top Ups. The RRO and subsequent application process being updated will</p>

		mean a more responsive adaptations service for Trafford residents which will in turn ensure the DFG processes will work more efficiently.
8	How will the policy/function (or change/improvement), be implemented?	<p>Following the public consultation, the Council are proposing the following recommendations from 1 April 2019:</p> <ol style="list-style-type: none"> <li>1) <b>Combine the Adult Social Care Charging Policy and Debt Recovery policy to remove duplication and include Disabled Facilities Grant (DFG) to create a single policy.</b></li> <li>2) <b>Include clear guidance regarding Disability Related Expenditure (DRE)</b></li> <li>3) <b>Introduce charges, <u>initial only</u>, plus interest, to clients who have excess of the capital limit of £23,250 to undertake the legal work to set up funding arrangements and legal agreements.</b></li> <li>4) <b>Develop and update the existing Disabled Facilities Grant (DFG) Regulatory Reform Order (RRO).</b></li> </ol>
9	What factors could contribute or detract from achieving these outcomes for service users?	None, the policies would be updated, shared and implemented in to core business from 1 April 2019
10	Is the responsibility for the proposed policy or function shared with another department or authority or organisation? If so, please state?	Exchequer Services

## C. Data Collection

1	Do you have monitoring data on the number of people (from different equality groups) who are using or are potentially impacted upon by your policy/ function?	<p>The proposal will apply to people who are in receipt of Adult Social Care aged 18 and over. There are 1611 current clients with a DRE disregard in their financial assessment and equality information is collected for gender, ethnicity, age, sexuality and religion.</p> <p> Copy of 20190131 DRE Clients.xlsx</p>
2	Please specify monitoring information you have available and attach relevant information*	<p>Controcc Report</p> <p>The most recent report (07-01-2019) outlines of the current cases allocated to the Adaptations service are 187 cases of clients aged 60+ and 175 below 60 of mixed gender.</p>
3	If monitoring has NOT been undertaken, will it be done in the future or do you have access to relevant monitoring data?	<p>N/A</p> <p>For the process of Land Charges, Moving Assistance Grant and increased DFG funding to £50,000 there will be ongoing monitoring and will be included in future reports.</p>

*\*Your monitoring information should be compared to the current available census data to see whether a proportionate number of people are taking up your service*



<b>D. Consultation &amp; Involvement</b>		
1	Are you using information from any previous consultations and/or local/national consultations, research or practical guidance that will assist you in completing this EIA?	Yes – see below
2	Please list any consultations planned, methods used and groups you plan to target. (If applicable)	<p>All people in receipt of Adult Social Care and Social Care providers were personally invited to feed in to an online survey and/or attend a public consultation event.</p> <p><u>Stakeholder Events</u> 22 October 2018 – Sale Waterside 25 October 2018 – Sale Waterside 05 November 2018 – Trafford Town Hall 08 November 2018 – Trafford Town Hall</p> <p>The Lead consultation officer also attended a meeting at Trafford Carers Centre and ran a Members event.</p>
3	**What barriers, if any, exist to effective consultation with these groups and how will you overcome them?	A potential barrier to effective consultation was to ensure that service users and their family members where applicable fully understood the changes and how/if they would be affected. Each service user or their legal representative was written to in order to invite them to attend an event; also a phone number and email address was also provided along

		with a call back service. Providers were briefed on the changes along with Social Workers and the Carers Centre. An easy read version was also made readily available.
--	--	--

*\*\*It is important to consider all available information that could help determine whether the policy/ function could have any potential adverse impact. Please attach examples of available research and consultation reports*

**E: The Impact – Identify the potential impact of the policy/function on different equality target groups**

*The potential impact could be negative, positive or neutral. If you have assessed negative potential impact for any of the target groups you will also need to assess whether that negative potential impact is high, medium or low*

	Positive	Negative (please specify if High, Medium or Low)	Neutral	Reason
<b>Sex</b>			✓	<b>Each service user goes through the standard assessment process.</b> Therefore the Adult Social Care Policy Charging, Debt and Disability Facilities Grant Changes will apply to every Adult Social Care client where appropriate and relevant irrespective of their protected characteristics.
Pregnant women & women on maternity leave			✓	<b>Each service user goes through the standard assessment process – see</b>

				above
Gender Reassignment			✓	Each service user goes through the standard assessment process – see above
Marriage & Civil Partnership			✓	Each service user goes through the standard assessment process – see above
<b>Race-</b> include race, nationality & ethnicity (NB: the experiences may be different for different groups)			✓	Each service user goes through the standard assessment process – see above
<b>Disability</b> – physical, sensory & mental impairments			✓	Each service user goes through the standard assessment process – see above
<b>Age Group</b> - specify eg; older, younger etc)			✓	Each service user goes through the standard assessment process – see above
<b>Sexual Orientation</b> – Heterosexual, Lesbian, Gay Men, Bisexual people			✓	Each service user goes through the standard assessment process – see above
<b>Religious/Faith groups</b> (specify)			✓	Each service user goes through the standard

				assessment process –see above
--	--	--	--	-------------------------------

**As a result of completing the above what is the potential negative impact of your policy?**

High

Medium

Low

Neutral

**F. Could you minimise or remove any negative potential impact? If yes, explain how.**

Race:	NA
Gender, including pregnancy & maternity, gender reassignment, marriage & civil partnership	NA
Disability:	NA
Age:	NA
Sexual Orientation:	NA
Religious/Faith groups:	NA
Also consider the following:	
1 If there is an adverse impact, can it be justified on the grounds of promoting equality of opportunity for a particular equality group or for another legitimate reason?	NA
2 Could the policy have an adverse impact on relations between different groups?	NA



3	If there is no evidence that the policy <i>promotes</i> equal opportunity, could it be adapted so that it does? If yes, how?	NA
---	--	----

**G. EIA Action Plan**

<b>Recommendation</b>	<b>Key activity</b>	<b>When</b>	<b>Officer Responsible</b>	<b>Progress milestones</b>
Review process guidance to align to the new policy	Amend and combine the policies, refreshing and including the changes	By 1 April 19	Louise Shaw Anna Kemp	31 March 2019
Monitor any impacts of the changes	Review the numbers affected by the changes and any feedback received via customer contact	Quarterly	Louise Shaw Anna Kemp	Quarterly in 2019
Progress Third Party Top Up Options	Trial new processes and procedures to identify which best fit the balance between reducing the financial risk to the Council against intrusion of the third parties finances in a test and learn way	April to December 2019	Louise Shaw	July, October
Review DRE average costs annually	Ensure the average costs reflected are a true average and in line with costs provided by NAFAO	Annually	Helen Machin	July each year

Please ensure that all actions identified are included in the attached action plan and in your service plan.

**H. Review of Equality Impact after Implementation**

Review of Impact – 6 & 12 months	Protected Characteristic Impacted	Type of Impact i.e positive/negative	Officer Responsible	Action to mitigate negative impact

Signed *Louise Shaw*

Date 12.4.19

Lead Officer – Louise Shaw - Head of Exchequer Services  
and for Adult Social Care Policy Charging and Debt Changes

Signed *Deborah Gent*

Date: 12<sup>th</sup> April 2019

Lead Officer – Deborah Gent – Specialist Commissioner  
And for the Disabled Facilities Grant (DFG) Changes

Signed

A handwritten signature in black ink, appearing to read "Diane Eaton". The signature is written in a cursive, flowing style.

Date 15 April 2019

Service Head – Diane Eaton, Acting Corporate Director for Adult Services