# **Service and Community Impact Assessment (SCIA)**

### **Front Sheet:**

#### **Directorate and Service Area:**

Adult Social Care

What is being assessed (e.g. name of policy, procedure, project, service or proposed service change):

Contributions Policy for Adult Social Care

Responsible owner / senior officer: Ben Threadgold

Date of assessment: May 2018

## **Summary of judgement:**

This assessment considers the impact of the proposed changes to the Adult Social Care Contributions Policy on individuals, communities, staff, other council services and providers.

The Adult Social Care Contributions Policy was introduced in January 2014 and was last revised in July 2016. It outlines how the council ensures a fair approach in assessing the contributions made by individuals towards the social care services they receive.

Following the introduction of a new Adult Social Care and finance system the council has taken the opportunity to review the Contributions Policy with a view to ensuring equity and sustainability whilst also maximising cost efficiencies. The review also aimed to address inconsistencies that have been identified in current policy. It has been completed in line with the legislation set out in the Care Act (2014).

This review has identified a number of suggested changes in policy which if implemented are likely to have both positive and negative impacts.

Potentially positive impacts include; some people will see a reduction in their contribution, the policy will be more equitable, it will address inconsistencies in approach and it will help sustain Adult Social Care.

Potentially negative impacts include; some people will see an increase in their assessed contribution and in some cases, may be impacted by more than one of the changes in policy, causing a cumulative increase in contribution.

Those people affected will be contacted by the council's Financial Assessment Team who will offer the person a full reassessment of their finances. If appropriate the

council will also review the person's care package to explore alternative ways of meeting their needs.

There are potential impacts on staff, other services and providers associated with awareness of the implementation of the new policy if the changes are agreed, but these are not considered to be significant and are mitigated through implementation plans.

The council implemented a 10-week public consultation involving 2 sets of letters and explanatory materials, focus groups, and email and telephone support. This assessment has been reviewed following the consultation period to ensure the consideration of potential impacts remains accurate, and reflects any newly identified impacts or changes as a result of the consultation feedback.

## **Detail of Assessment:**

## **Purpose of assessment:**

The purpose of this assessment is to consider the impact of the proposed revisions to the Adult Social Care Contributions Policy, which includes changes to current policy that will affect people using services, providers and council services / staff.

This assessment also fulfils the Council's requirements under Section 149 of the Equalities Act 2010, as set out below.

Section 149 of the Equality Act 2010 ("the 2010 Act") imposes a duty on the Council to give due regard to three needs in exercising its functions. This proposal is such a function. The three needs are:

- o Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act.
- o Advance equality of opportunity between people who share a protected characteristic and those who do not.
- o Foster good relations between people who share a protected characteristic, and those who do not.

Complying with section 149 may involve treating some people more favourably than others, but only to the extent that that does not amount to conduct which is otherwise unlawful under the new Act.

The need to advance equality of opportunity involves having due regard to the need to:

- remove or minimise disadvantages which are connected to a relevant protected characteristic and which are suffered by persons who share that characteristic.
- take steps to meet the needs of persons who share a relevant protected characteristic and which are different from the needs other people, and
- encourage those who share a relevant characteristic to take part in public life or in any other activity in which participation by such people is disproportionately low.

• take steps to meet the needs of disabled people which are different from the needs of people who are not disabled and include steps to take account of a person's disabilities.

The need to foster good relations between different groups involves having due regard to the need to tackle prejudice and promote understanding.

These protected characteristics are:

- age
- disability
- gender reassignment
- pregnancy and maternity
- race this includes ethnic or national origins, colour or nationality
- religion or belief this includes lack of belief
- sex
- sexual orientation
- marriage and civil partnership

# **Context / Background:**

The Adult Social Care Contributions Policy was introduced in January 2014 and was last revised in July 2016. The policy outlines how the council ensures a fair approach in assessing the contributions made by individuals towards the social care services they receive.

Following the introduction of a new Adult Social Care and finance system the council has taken the opportunity to review the Contributions Policy with a view to ensuring equity and sustainability whilst also maximising cost efficiencies. The review also aimed to address inconsistencies that have been identified in current policy. It was completed in line with the legislation set out in the Care Act (2014).

The council is proposing to make the following changes to the Contributions Policy:

- Make an indicative 25% allowance for disability related expenditure in a person's financial assessment, but offer an individual assessment of these costs if a person feels their disability related expenses are greater than this.
- Reduce the initial fee the Council charges for arranging a person's care from £150 to £140, and introduce an annual fee of £210 where the Council is asked to manage the ongoing provision of care and support.
- Align its policy on 12 Week Property Disregards more closely with the Care Act and Only offer a 12-week property disregard (where the Council does not include the value of person's property in their financial assessment for the first 12 weeks of care) to new residents entering a care home for a permanent stay or where there is an unexpected change in a person's financial circumstances.

- Financially assess everyone on an individual basis and no longer offer couples assessments in accordance with the Care Act 2014.
- Charge people the full cost of home care services, based on what care providers actually charge the Council, rather than an average hourly rate. This would not include contingency care where a person is in the Reablement Service and waiting for long term care.

The council also initially proposed to amend its policy on non-statutory services to clarify the charging process for these services. Following consultation this was reviewed and the proposal is now to:

- (a) Continue the current charging practice for the Telecare service,
- (b) Continue the current charging practice for the Laundry service, subject to a review of this service being completed, and
- (c) Reserve the option to charge for one-off non-statutory services, such as blitz cleans.

# **Proposals:**

# **Disability Related Expenditure**

Disability Related Expenditure (DRE) is the cost a person incurs due to their age or disability. This forms part of the overall financial assessment which determines how much a person can afford to contribute towards their care costs.

Currently the council completes an individual DRE assessment for every person and makes an allowance for this cost regardless of whether a person is claiming disability benefits or not.

The council proposes a move to a percentage of disability benefits model under which a person's allowance for DRE will be based on the disability benefits they receive. Under the new policy the person will be given an indicative DRE allowance of 25% of their disability benefit, which will change in line with any increases in benefits.

If a person is not claiming disability benefits, no indicative allowance will be made for Disability Related Expenditure. However, the council will support the person to make a claim for these benefits by referring them to the Department of Work and Pensions or Age UK.

If a person feels that their Disability Related Expenditure is greater than the indicative allowance they will be able to request an individual DRE assessment.

The council has chosen this approach in order to remove the current subjectivity which surrounds the Disability Related Expenditure assessment and to introduce a fairer, more straightforward and less intrusive approach.

An indicative allowance for Disability Related Expenditure will also allow the council to complete financial assessments using Department of Work and Pensions data. Where a client has given all of their financial details to the Department of Work and Pensions they will not need to resubmit this data to the council.

The new policy will mean that:

- There is a direct link between a person's disability benefit and their Disability Related Expenditure.
- In many cases the person won't need to undergo a home visit from a council
  officer in order to complete the financial assessment.
- The person won't need to provide details of their Disability Related Expenditure, some of which can be intimate in nature, unless they choose to do so.
- It is likely to lead to a quicker financial assessment and the person will know how much they will be expected to contribute sooner.
- The financial assessment will be easier to understand.

## **Arrangement Fees**

Legislation introduced in the Care Act 2014 enables the council to charge an arrangement fee for people with eligible needs, who have financial assets above £23,250 and ask the council to arrange their care. The arrangement fee takes into account the cost of negotiating and/or managing the contract with a provider and covers any administration costs incurred. The council cannot charge for carrying out assessments, preparing support plans and reviews of support. Arrangement fees cannot be applied to residential care.

The council currently charges two levels of arrangement fee depending on the level of its involvement. These are both one off fees.

**Level 1** - £150 - Where the council sources the care but the person enters in to a private arrangement with the care provider.

**Level 2** - £500 - Where the council sources the care and manages the ongoing provision of care and support

The council proposes to change the way it implements arrangement fees by:

- 1. Reducing the one-off arrangement fee from £150 to £140 and
- 2. **Introducing an annual fee of £210** where the Council is asked to manage the ongoing provision of care and support.

The council is proposing this approach to ensure that the arrangement fee will reflect the ongoing cost to the council of monitoring a person's care. It will also ensure equity in that the person will be charged during the period which they ask the council to arrange and monitor their care.

## 12-Week Property Disregards

The 12-Week Property Disregard is based on national legislation and means that when a person first enters a care home, the value of their property is not taken into account during this initial twelve-week period. The aim of the disregard is to give people moving into a care home time to decide what they want to do with their property.

Under the current policy the council offers a 12-Week Property Disregard to everyone with eligible care needs, including people who have previously placed themselves in a private care home and then approach the council for financial assistance.

The council proposes to revise its policy on 12-Week Property Disregards so that it aligns more closely with the legislation set out in the Care Act. The 12-Week Property Disregard will be offered in the following circumstances:

- (a) When a person first enters a care home as a permanent resident
- (b) When a property disregard other than the 12-week property disregard unexpectedly ends because the qualifying relative has died or moved into a care home
- c) At the council's discretion if there has been a sudden and unexpected change in the person's financial circumstances.

The change in policy will mean that self-funders who later approach the council will no longer be given an automatic 12-Week Property Disregard.

The council is proposing this approach as the purpose of a 12-Week Property Disregard is to give people moving into a care home time to decide what they want to do with their property. People who have previously placed themselves in a care home under a private arrangement have already had time to consider this and so a 12-week property disregard is not appropriate in these cases.

There is also a financial cost to the council in being more generous in its treatment of 12-week property disregards than the Care Act requires and the change in policy would remove the costs the council currently incurs in doing taking this approach.

# Couples

The council currently offers people living with a partner in their own homes the option of receiving both a single and joint financial assessment. It then uses the assessment with the lowest contribution.

Under the new policy the council proposes to assess every person as an individual which would better align with the guidance set out in the Care Act.

This approach is being proposed to ensure that everyone is assessed under the same criteria. Whilst the council has previously used its discretion in being more generous than the Care Act requires, there is a financial impact in doing this. The change in policy would remove the current additional cost the council incurs.

## **Full Cost Recovery**

When recharging the cost of home-care the council currently uses an average hourly rate of £19.40 per hour. Often this does not reflect the actual amount the council is being charged by care providers which means in these cases the council is partially subsidising the cost of care.

Under the new policy the council proposes to adopt a model of full cost recovery and recharge at the same hourly rate it is billed by care providers.

This approach is being proposed as the council cannot continue to subsidise the cost of care for people who are assessed to pay the full cost of their care. Recharging at the full cost rate would remove the cost the council incurs.

# Non-statutory services

The council currently commissions a number of non-statutory services which can be used to meet a person's eligible needs, examples include:

- Telecare
- Laundry
- Blitz Cleans

In light of feedback from professionals, service providers and the public it is recommended that the approach to charging for non-statutory services differs according to the type of support delivered.

The Telecare service helps older and vulnerable people remain independent and feel safer in their own home through the use of monitoring equipment and sensors. People who are currently not charged for this service and who have not had a care and support assessment are usually people receiving Employment Support Allowance, Housing Benefit, Income Support or Guarantee Pension Credit, and are passported to the service.

It is likely that this service is playing a key role in helping prevent their need for longer term care and support, through maintaining their independence. Charging for the Telecare service could increase costs for the council through the provision of other forms of longer-term support, where these individuals choose not to pay the charge to continue receiving the service.

It is proposed that the current charging practice for the Telecare service therefore continues.

The Laundry service is in the process of being reviewed, therefore it is proposed that the charging practice remains the same until that review is complete.

Blitz cleans may be chargeable according to a person's eligible need. If an eligible need was not established, the person may be charged the full cost of the service. If they have an eligible care need then this will be charged in line with their assessed contribution. These charges will be made subject to managerial discretion.

## **Evidence / Intelligence:**

The proposals have been developed based on an analysis of current practice within Oxfordshire County Council. The council has also considered the policies used by other local authorities, the National Association of Financial Assessment Officers and in conjunction with the guidance set out in the Care Act.

The proposed changes to the Contributions Policy has been subject to public and stakeholder consultation. The outcome of this has further informed this assessment of the impact on individuals, staff and services, and the development of the final recommended policy changes. The consultation included focus group discussions, online and telephone consultation and stakeholder engagement, and written feedback through paper questionnaires, letters and emails. There was also targeted communication with people identified as most likely to be impacted by the proposed changes.

Current data from the council's financial assessment system was used to provide an estimation of the impact of each proposal. The full impact will not be known until financial reassessments for all those affected are complete, should the policy changes be agreed.

#### **Disability Related Expenditure**

The change in assessing Disability Related Expenditure would apply to both new and existing users of Adult Social Care services.

Of the 3,500-people affected, modelling indicates that up to 40% of people (c. 1,300) could see an increase in their weekly contribution as a result of this change, whilst 60 % (c. 2,200) could see a decrease or no change. N.B. These figures are indicative only and a full assessment of people may result in them paying a different contribution.

#### **Arrangement Fees**

The change in arrangement fees would apply to both new and existing people who have savings over the full cost limit and who ask the council to arrange their care.

### 12 Week Property Disregard

The change in policy on 12 Week Property Disregards would only apply to new people from the date of the policy change.

### Couples

The change in policy for couples would affect both new and existing users of Adult Social Care services. Of the 250-people affected, modelling indicates that moving to a single assessment would mean that up to 45% of people (c. 110) could see an increase in their weekly contribution, whereas 55% (c. 130) could see this decrease or remain the same.

Whilst the council has previously used its discretion in being more generous than the Care Act requires, there is a financial impact in doing this.

#### Full cost recovery

If the council implements a model of full cost recovery this would affect both new and existing users of Adult Social Care services.

Of the people currently using services more than half would be likely to see a reduction or no change in their contribution

The council's net income is currently being reduced by not receiving up to £360,000 annually by not recharging at the full cost rate. It should be noted that this figure depends on the actual hours of care being delivered.

# Alternatives considered / rejected:

Feedback from staff indicates that some areas of the Contributions Policy aren't clear and there have been inconsistencies in its application and interpretation as a result.

In some cases, the council's policy is more generous than is required under the Care Act and there is a monetary cost in taking this approach. In order to ensure the sustainability of Adult Social Care in Oxfordshire the council can no longer absorb the monetary cost of a policy that is more generous than is required under current legislation. It is for this reason that doing nothing is not an option.

A number of other potential changes to existing policy have also been considered and discounted as either having too great an impact on the people affected or being too costly for the Council to implement.

The possibility of phasing the implementation for those adversely affected was considered, but was deemed too costly and would prove too complex for people to understand.

The council also initially proposed to amend its policy on non-statutory services to clarify the charging process for these services. Following consultation this was reviewed and the proposal is now to:

- (a) Continue the current charging practice for the Telecare service,
- (b) Continue the current charging practice for the Laundry service, subject to a review of this service being completed, and
- (c) Reserve the option to charge for one-off non-statutory services, such as blitz cleans.

# **Impact Assessment:**

## Impact on Individuals and Communities:

The changes in policy affect everyone equally, regardless of their age, gender reassignment, pregnancy and maternity, race (including ethnic or national origins, colour or nationality), religion or belief (including lack of belief), sex, sexual orientation, marriage and civil partnership. However, it is more likely to affect older people and people with disabilities due to the nature of people who need social care.

Whilst the amendments to the policy do not affect any one group in particular it is likely that some people will see a change in the amount they are assessed to contribute towards their care, with some paying more, some paying less and with no change for others.

Department of Health guidance states that contributions to care costs should not reduce a person's net income below levels of income equal to basic levels of Income Support or the Guarantee Credit of Pension Credit plus 25%. This means that people on low incomes and from areas of deprivation are likely to contribute less towards the cost of their care. The amendments to the policy are in line with this approach and will ensure that people are always left with a minimum level of income before they are expected to contribute towards their care.

In a small number of cases the policy changes may have a cumulative affect resulting in a significant increase in a person's contribution. For example, someone previously benefitting from a couples' allowance may be made worse off by moving to a single assessment and then further impacted by the change in assessing Disability Related Expenditure. Based on current modelling of the interplay between the policy changes, where people are affected it will normally be by no more than two of the changes and in a very small number of cases a maximum of three of the changes.

For example, a person paying the full cost of their care will be affected by the move to full cost recovery and by the change in arrangement fees but they would not also be affected by the change in policy 12 Week Property Disregard, couples or non-statutory services.

In some cases, a person might be positively impacted by one change but then

negatively impacted by another.

If the policy changes are agreed, the council will write to anyone affected by the changes in policy and offer the person a reassessment of their finances to ensure it captures the most up to date information. It will ensure that the person is not left with less than the minimum income stipulated in the Care Act. Where appropriate the council will review the person's care package to look at the alternative ways of meeting the person's needs.

Risks	Mitigations
General	
People using services are not aware of the consultation or able to contribute to it.	As part of the consultation process, people were informed of the proposed changes via 2 letters with explanatory materials. 3 public meetings were held across the county and a dedicated telephone line was set up to answer questions.
	Consultation feedback about people not understanding the proposals led to a second letter being sent to everyone affected with more explanatory materials to help them understand how the changes may affect them.
	People were encouraged to give their views via a questionnaire that was sent to them or via the consultation website.
	Stakeholder and provider organisations were notified and a focus group was set up to discuss their views on the proposals.
People using services are not aware of the changes in policy.	Summary and easy read versions of the policy were available on the consultation site and by e-mail or post on request.
Increases in contributions as a result of policy changes are unaffordable for individuals.	The council's Financial Assessment Team will offer the person a full reassessment of their finances and will contact their social worker in the event that they wish to reassess their care

People will still be entitled to their statutory minimum income guarantee for everyday living costs.

There will be a 3-month implementation phase where the person will be advised of their new contribution to give them time to plan their finances.

If appropriate the council will review the person's care package to explore alternative ways of meeting their needs.

The waiver scheme may be used in cases where the change in policy causes serious financial hardship.

If approved the implementation of policy will not be until 1<sup>st</sup> October 2018 to allow time to prepare and work with individuals to limit the impact.

The people likely to be affected were advised of the proposed changes as part of the consultation. They will also be written to with their assessed contribution following cabinet decision and there will be 3 months before this takes effect. If a person feels their disability related costs are higher than the indicative allowance, the council will offer them an individual assessment to examine these costs in more detail.

#### **Disability Related Expenditure**

Risk that people with higher than average Disability Related Expenditure may be financially disadvantaged The council has modelled the Disability Related Expenditure allowance on the typical current costs incurred by people currently using services. This resulted in an allowance of 22% and the council has added an additional buffer of 3% to this figure to allow for any variance in the person's actual expenditure.

All of the people affected will be advised in advance of the changes that are being introduced. This will include information

about how to contact the council should they wish to undergo an individual DRE assessment.

People will still be entitled to their statutory minimum income guarantee for everyday living costs.

There will be a 3-month implementation phase where the person will be advised of their new contribution to give them time to plan their finances.

If appropriate the council will review the person's care package to explore alternative ways of meeting their needs.

In exceptional circumstances there is an appeal process that can waiver a financial assessment outcome.

Clients who do not receive disability related benefits will not qualify for any DRE allowance and will see a rise in their contribution. Individuals may decide that they no longer wish to receive care services or reduce their care package due to the cost. This could mean they do not receive the support they require to meet their eligible needs.

All clients will be advised in advance of the changes that are being introduced. They will be advised how to apply to claim disability benefit from the DWP and what to do if they receive this benefit. Where required the DRE allowance will be backdated to the start of the payment.

The council's Financial Assessment Team will offer the person a full reassessment of their finances and will also work closely with the person's social worker to ensure this risk is minimised.

People will still be entitled to their statutory minimum income guarantee for everyday living costs.

There will be a 3-month implementation phase where the person will be advised of their new contribution to give them time to plan their finances.

If appropriate the council will review the person's care package to explore alternative ways of meeting their needs.

The waiver scheme may be used in

Disability premiums as part of a person's Employment and Support Allowance will not be used to calculate an indicative disability related expenditure allowance. This could mean that people with these premiums will be disadvantaged.

cases where the change in policy causes serious financial hardship.

A person's disability premium benefit will not be used to calculate the indicative DRE allowance however those people receiving such premiums will still receive one of the disability benefits that are used in the calculation.

The council's Financial Assessment Team will offer the person a full reassessment of their finances and will also work closely with the person's social worker to ensure this risk is minimised.

People will still be entitled to their statutory minimum income guarantee for everyday living costs.

There will be a 3-month implementation phase where the person will be advised of their new contribution to give them time to plan their finances.

If appropriate the council will review the person's care package to explore alternative ways of meeting their needs.

The waiver scheme may be used in cases where the change in policy causes serious financial hardship.

If a person feels that their indicative DRE allowance is not sufficient they can ask for an individual assessment

#### **Arrangement Fees**

People who have paid the one-off fee of £500 under the council's previous policy on arrangement fees will now be expected to pay an ongoing annual fee.

The council will contact the people affected by the change in policy to give them prior notice. This will include details of alternative options should they no longer wish for the council to arrange and monitor their care.

People may be charged a second 'oneoff' fee if they wished to change care provider.

The Council will consider charging the arrangement fee again if it is reasonable to do so. If the provider could not provide adequate care, there was a safeguarding concern or the change was due to

provider collapse then it would not be appropriate to charge the fee a second time.

## 12 Week Property Disregards

As the council has previously been more generous in allowing self-funders who have arranged care privately, a 12 Week Property Disregard there may be an expectation that this will continue.

The council was clear during the public consultation about the proposed change in policy, and will continue to be clear in any future communication with people using services.

### **Couples**

For some couples the change in policy will result in them paying more for their care services than under the previous policy. Some individuals may decide that they no longer wish to receive care services or reduce their care package due to the cost. This could mean they do not receive the support they require to meet their eligible needs.

The council's Financial Assessment Team will offer the person a full reassessment of their finances and will contact their social worker in the event that they wish to reduce or cancel their care.

People will still be entitled to their statutory minimum income guarantee for everyday living costs.

There will be a 3-month implementation phase where the person will be advised of their new contribution to give them time to plan their finances.

If appropriate the council will review the person's care package to explore alternative ways of meeting their needs.

The waiver scheme can be used in cases where the change in policy causes serious financial hardship.

### Full cost recovery

For some people the change in policy may result in them paying more for their care than under the previous policy and as a result they may decide to cancel their care services or reduce their care package due to the cost. This could

The council will identify those people affected and communicate this change in policy. It will include information about the alternative options available to them.

People will still be entitled to their

mean they do not receive the support they require to meet their eligible needs. statutory minimum income guarantee for everyday living costs.

There will be a 3-month implementation phase where the person will be advised of their new contribution to give them time to plan their finances.

The council's Financial Assessment Team will offer the person a full reassessment of their finances and will contact their social worker in the event that they wish to reduce or cancel their care

If appropriate the council will review the person's care package to explore alternative ways of meeting their needs.

The waiver scheme can be used in cases where the change in policy causes serious financial hardship.

## Impact on Staff:

There is likely to be an initial increase in workload for staff in the Financial Assessment Team in dealing with the financial reassessments and the queries resulting from the changes in policy. This could in turn impact on the team's day to day workload. An implementation plan will be put in place to ensure the team is sufficiently resourced to cope with the increase in workload during this period, including additional resources as required.

There is also a risk that staff are not aware of the changes in policy and do not implement it effectively. A communication plan will be put in place to ensure that staff are fully briefed on the changes in policy. This will include training sessions as well as guidance and procedure documents. There will also be a review of other policies, procedures and guidance available to staff to ensure these are updated or removed where they are no longer relevant.

Risks	Mitigations
Increased workload for Financial	Briefings and training for staff as part of
Assessments Team in having to	implementation plan following agreement
reassess people currently using services	of policy
in accordance with the new policy could	
impact on waiting times for assessment	Consideration will be given to employing
for new clients	additional staff within the Financial
	Assessment Team for the period leading
	up to and immediately after

implementation. Some changes in the policy may reduce burdens on the Financial Assessments Team and therefore limit the impact on waiting times for assessments Communications and engagement plan Staff are not aware of the new policy, as part of consultation included and cannot implement it / communicate it communication and training with staff. to people using services appropriately. Review of other policies, procedures and guidance available to staff, including the Council intranet and internet sites, to ensure that they align and consistently enforce the new policy Implementation and training plan will be developed for staff in bringing in the new policy.

# Impact on other Council services:

The changes in policy may have an impact on Adult Social Care Teams where people receiving services approach their social worker about the changes in policy. The council will ensure that all Adult Social Care Teams are fully briefed about the change in policy and where to direct people in the event of any queries.

It is also possible that implementing the new policy could lead to increased complaints from clients and carers, and legal challenge. However, as the changes in the policy have been considered in line with the guidance set out in the Care Act as well in consultation with various teams across the council including with colleagues in finance and social care, these risks are not considered to be significant.

Risks	Mitigations
Increase in workload for Social Workers in terms of queries, reassessments and waivers	The council will ensure that social workers are aware of the new policy and where to direct people in the event of queries.
Increase in the number of complaints for the council's Complaints Team.	The council will aim to mitigate this by contacting those people affected as part of the communications plan.
	The council will ensure its Complaints Team is fully briefed and aware of the

	change in policy.
Potential increase in debt cases for Debt Recovery Team if people refuse to pay for any increase in their contribution.	Those likely to be adversely affected will be contacted as part of the consultation, and offered a re-assessment and help to consider alternative care provision to reduce costs if appropriate

## Impact on providers:

The majority of the policy changes do not directly affect care providers, however there is a risk that if they are not told of or do not understand the policy changes they may give incorrect information to people using services. However, they were made aware of the consultation and asked to contribute their opinions. They will be informed of any resulting policy changes.

Risks	Mitigations
If care providers are not aware of the change in policy they may give people using services incorrect information.	Care providers were included in the public consultation.
	Providers will be fully briefed on any subsequent policy changes.
	All communications given by providers to people using services will be updated.

#### **Social Value**

If the Public Services (Social Value) Act 2012 applies to this proposal, please summarise here how you have considered how the contract might improve the economic, social, and environmental well-being of the relevant area.

How might the proposal improve the economic well-being of the relevant area?

N/A, beyond contributing to the sustainability of social care and supporting people to remain independent for as long as possible (and therefore economically active within the local area

How might the proposal improve the environmental well-being of the relevant area?

N/A, beyond potential for slight reduction in travel around the county undertaking financial assessments.

## **Action plan:**

Summarise the actions that will be taken as a result of the assessment, including when they will be completed and who will be responsible. It is important that the officer leading on the assessment follows up to make sure the actions are completed, and updates the assessment as appropriate. Any significant risks identified should also be added to the appropriate service or directorate risk register, to ensure they are appropriately managed and reviewed.

Action	By When	Person responsible
Informal Cabinet	28 November 2017	Kate Terroni / Benedict Leigh
Develop communications and stakeholder engagement plan for consultation period	12 January 2018	Lynn Smith/Ben Threadgold
Public consultation (8 weeks)	12 January – 3 April 2018	Lynn Smith/Ben Threadgold
Cabinet approval of new policy following consultation	22 May 2018	Kate Terroni / Benedict Leigh
Develop implementation plan for policy, accompanying policies, procedures and guidance	End May 2018	Rob Winkfield /Jason Felstead/Claire Pollock
Communications plan- write to those affected by the policy to inform them of the decision.	End June 2018	Sheldon O'Donoghue
3-month period of requested individual reassessments prior to implementation of policy	June-September 2018	Sheldon O'Donoghue
Implementation of policy	October 2018	Ben Threadgold / Claire Pollock

# Monitoring and review:

Try to be as specific as possible about when the assessment will be reviewed and updated, linking to key dates (for example when consultation outcomes will be available, before a Cabinet decision, at a key milestone in implementation)

# Person responsible for assessment: Ben Threadgold/Rob Winkfield

Version   Date   Notes	Version Date	Notes	
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		(e.g. Initial draft, amended following consultation)
1	08/06/17	Initial draft
2	10/05/2018	Amended following consultation