

## Stage 1 Equality Impact Assessment – Initial Screening

<b>Assessor(s) Name(s):</b>	Richard Webb, Development Officer, Adult Social Care
<b>Directorate:</b>	Adult Social Care
<b>Date of Completion:</b>	24 April 2017

### Name of Policy/Strategy/Service/Function Proposal

The council is seeking to undertake a two month consultation period to determine people's views on changing its non-residential care financial assessment process to include disability benefit income at the higher or enhanced rate.

Following the development of the Isle of Wight Council Medium Term Financial Strategy (MTFS) there is a need for Adult Social Care to review the way it works across all teams and to identify savings and efficiencies that can assist in meeting the £3,084,100 ASC savings target for 17/18 set out in the MTFS.

The Care Act 2014 provides the opportunity for LA's to take into account higher or enhanced rate disability benefits within a non-residential financial assessment.

### The Aims, Objectives and Expected Outcomes:

Adult Social Care has been tasked through the Medium Term Financial Strategy to deliver significant savings throughout 2017/18. Savings required during this period equate to approximately £3m.

Income from charging is an important contribution to the Adult Social Care budget.

The aim of the proposal is to increase the amount of income that the council receives in charging people who receive non-residential care services based on the full rate of Higher Rate Attendance Allowance (AA) / Disability Living Allowance (DLA) / Personal Independence Payment (PIP) (excluding mobility component).

Currently the council disregards £27.45 per week, equivalent to the "night time" support element of both higher rate AA and higher rate DLA Care Component when calculating available income for care and support at home. This disregard has also been applied to the "enhanced" rate of PIP daily living component.

It is proposed that the council takes the full rate of AA, DLA and PIP into account. The council allows for all reasonable extra costs of illness or disability (known as Disability Related Expenditure) when calculating the amount of net disposable income available for charging and, therefore, the inclusion of these benefits in full is appropriate.

The proposal will also ensure everyone who receives a disability related benefit is treated equally by making sure that all benefit income, other than the mobility component of DLA and PIP, is taken into consideration as part of their charge. Currently, people who receive these benefits at the higher or enhanced rate do not have their full care related income taken into account whilst those people who are paid benefits at the lower or standard rate are required to have all their benefit income included in their charging assessment.

There are approximately 1,090 people currently supported by Adult Social Care who live at home and receive services that are chargeable. Approximately 900 people receive disability related benefits at the higher or enhanced rate and would be impacted by this proposal. If the proposal is agreed, this could generate an additional £1.2m per annum in a full year.

This proposal is subject to a recommendation to Cabinet to undertake a two month consultation directly with users of the council's non-residential care services and key stakeholders, as well as potential users of our care services, parish councils and residents on the Isle of Wight in general.

The outcome of the consultation will be taken into account in the equality impact assessment that will be provided to assist members to make a final decision on whether or not the council changes the way it considers disability benefits at the higher or enhanced rate as part of a person's income when making charges for non-residential care and how the decision will impact on those people in the protected characteristics.

- This is a new policy proposal

## Key Questions to Consider in Assessing Potential Impact

Will the policy, strategy, service or council function proposal have a negative impact on any of the protected characteristics or other reasons that are relevant issues for the local community and/or staff?	Yes
Has previous consultation identified this issue as important or highlighted negative impact and/or we have created a “legitimate expectation” for consultation to take place? A legitimate expectation may be created when we have consulted on similar issues in the past or if we have ever given an indication that we would consult in such situations	Yes
Do different groups of people within the local community have different needs or experiences in the area this issue relates to?	Yes
Could the aims of these proposals be in conflict with the council’s general duty to pay due regard to the need to eliminate discrimination, advance equality of opportunity and to foster good relations between people who share a protected characteristic and people who do not?	No
Will the proposal have a significant effect on how services or a council function/s is/are delivered?	Yes
Will the proposal have a significant effect on how other organisations operate?	No
Does the proposal involve a significant commitment of resources?	No
Does the proposal relate to an area where there are known inequalities?	Yes
<p>If you answer <b>Yes</b> to any of these questions, it will be necessary for you to proceed to a full Equality Impact Assessment after you have completed the rest of this initial screening form.</p> <p>If you answer <b>No</b> to all of these questions, please provide appropriate evidence using the table below and complete the evidence considerations box and obtain sign off from your Head of Service.</p>	

Protected Characteristics	Positive	Negative	No impact	Reasons
Age			X	It is possible that people in this protected characteristic may be affected by this proposal but only if they have a <b>disability</b> with needs that are considered eligible under the Care Act 2014. People in this protected characteristic without disability needs that could be considered eligible under the Care Act 2014 <b>will not</b> be affected.
Disability		X		The proposal <b>will</b> affect this protected characteristic because care support and, therefore, a requirement to pay a contribution, are only offered to people with a disability that could be considered eligible under the Care Act 2014.
Gender Reassignment			X	It is possible that people in this protected characteristic may be affected by this proposal but only if they have a <b>disability</b> with needs that are considered eligible under the Care Act 2014. People in this protected characteristic without disability needs that could be considered eligible under the Care Act 2014 <b>will not</b> be affected.
Marriage & Civil Partnership			X	It is possible that people in this protected characteristic may be affected by this proposal but only if they have a <b>disability</b> with needs that are considered eligible under the Care Act 2014. People in this protected characteristic without disability needs that could be considered eligible under the Care Act 2014 <b>will not</b> be affected.
Pregnancy & Maternity			X	It is possible that people in this protected characteristic may be affected by this proposal but only if they have a <b>disability</b> with needs that are considered eligible under the Care Act 2014. People in this protected characteristic without disability needs that could be considered eligible under the Care Act 2014 <b>will not</b> be affected.
Race			X	It is possible that people in this protected characteristic may be affected by this proposal but only if they have a

				<b>disability</b> with needs that are considered eligible under the Care Act 2014. People in this protected characteristic without disability needs that could be considered eligible under the Care Act 2014 <b>will not</b> be affected.
Religion / Belief			X	It is possible that people in this protected characteristic may be affected by this proposal but only if they have a <b>disability</b> with needs that are considered eligible under the Care Act 2014. People in this protected characteristic without disability needs that could be considered eligible under the Care Act 2014 <b>will not</b> be affected.
Sex (male / female)			X	It is possible that people in this protected characteristic may be affected by this proposal but only if they have a <b>disability</b> with needs that are considered eligible under the Care Act 2014. People in this protected characteristic without disability needs that could be considered eligible under the Care Act 2014 <b>will not</b> be affected.
Sexual Orientation			X	It is possible that people in this protected characteristic may be affected by this proposal but only if they have a <b>disability</b> with needs that are considered eligible under the Care Act 2014. People in this protected characteristic without disability needs that could be considered eligible under the Care Act 2014 <b>will not</b> be affected.

<b>Are there aspects of the proposal that contribute to or improve the opportunity for equality?</b>	<b>Yes</b>
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<b>Evidence Considered During Screening</b>
IW Council – Charging Policy for Non-Residential Adult Social Care Services <a href="https://www.iwight.com/documentlibrary/view/charging-policy-for-non-residential-asc-services">https://www.iwight.com/documentlibrary/view/charging-policy-for-non-residential-asc-services</a>

Dept Health – Care Act 2014 Care and Support Statutory Guidance:  
Chapter 8 – Charging and Financial Assessment  
Annex C – Treatment of Income

<https://www.gov.uk/government/publications/care-act-statutory-guidance/care-and-support-statutory-guidance#Chapter8>

Head of Service Sign off:	
Advice sought from Legal Services (Name)	
Date	

A signed version is to be kept by your team and also an electronic version should be published on the council's website (follow the link from the EIA page on the intranet)

## Stage 2 Full Equality Impact Assessment

<b>Assessor(s)Name(s):</b>	<b>Matthew Porter, Group Manager – Finance, Income &amp; Commissioning Richard Webb, Development Officer</b>
<b>Directorate:</b>	<b>Adult Social Care</b>
<b>Date of Completion:</b>	<b>24 October 2017</b>

### Name of Policy/Strategy/Service/Function Proposal

The council is considering a change to the council's non-residential care charging policy by including disability related benefits at the higher or enhanced rate as part of a person's means tested financial assessment.

Specifically, the council is seeking to take account of disability related benefit income received by people as follows:

- Attendance Allowance (AA) – the consideration is the council includes AA income at the higher rate (currently only the lower rate is included in a financial assessment);
- Disability Living Allowance (DLA) – the consideration is the council includes DLA benefit income at the higher rate (currently only the lower rate or middle rate is included in a financial assessment);
- Personal Independence Payments (PIP) – the consideration is the council includes PIP income at the enhanced rate (currently only the standard rate is included in a financial assessment).

On 15 June 2017, Cabinet made the decision to seek a two month consultation period to consider people's views on the proposed changes. The consultation was aimed at determining the opinion of those people who received non-residential care services including those individuals who would be directly affected by the proposals.

The outcome of the consultation, including the potential effect on people within the protected characteristic groups, will be reported to Cabinet on 9 November 2017 to enable a decision to be made as to how to consider treating higher or enhanced rates of disability benefit as part of a person's financial assessment.

### The Aims, Objectives and Expected Outcomes:

The change has been considered for two reasons. Firstly it will ensure equity in how all disabled related benefit income is treated in that people who receive these benefits at the higher or enhanced rate have the difference between the lower and higher rates effectively ignored for purposes of means testing for adult social care. By way of contrast, those people who receive the lower, middle or standard rates of these benefits have all this income taken into consideration in the means test. Secondly, it will assist Adult Social Care to contribute to the councils overall savings targets which are £7.5m in 2018/19 and £19m in total over the next three years (2018/19 to 2020/21).

It is important to note that these proposals will not affect the level of care provided by the council but will change the amount that a person is required to pay.

The proposal is considered necessary in light of the financial challenges facing the council, the growing demand for adult social care services and the need to treat people with equity by ensuring that everyone who receives a disability related benefit has the full amount of the amount of their benefit taken into account in their charging assessment.

Income from charging is an important contribution to adult social care's budget. The council is facing a significant reduction of core central government funding in 2018/19 and 2019/20, alongside an increasing demographic demand for services that is reflected by more elderly people and increasing longevity of disabled people.

It is important to note that, where disability related benefits are taken into account as part of a person's income when assessing how much they are required to pay, the council takes account of any additional disability related expenditure to allow the person to keep enough benefit to meet any needs which are not being met by the council.

As at 23 October 2017, 1400 people receive chargeable non-residential care services and 770 of these are estimated to receive disability related benefits at the higher or enhanced rate. The overall number of people receiving care services at home is increasing. The difference between higher / enhanced and middle, lower or standard rate of payment of these benefits is £27.45 per week and it can be seen that any change the council makes to the way it assesses these benefits as income will have a significant effect to both an individual person and the council. It must be emphasised that, if the proposal is agreed, not everyone would be required to pay £27.45 per week more as the exact amount of any increase would depend on their financial circumstance. Of the 770 people who are paid disability benefits at the higher or enhanced rate, 95 people would not be affected as their chargeable income is too low and 75 people would pay an amount that is based on their individual financial circumstance that is less than £27.45 per week.

It must be noted that:

- The proposal is in line with the provisions of the Care Act 2014; Current council policy has chosen not to include these benefit payments at the higher rate;
- The mobility component part of DLA and mobility part of PIP will not be included in a person's financial assessment;
- The council will continue to make sure that all eligible disability costs that a person may have (for example extra help for shopping, laundry, cleaning, prescriptions and higher fuel costs) are taken into account as part of how their charge is calculated. This is called Disability Related Expenditure;
- The council will also make sure that everyone has an allowance made in their financial assessment to meet the costs of their everyday living. The weekly allowance is set by the Dept of Health and covers food, heating and standard living costs;



- Services provided directly to carers will continue to be non-chargeable. It would only be the charge made for services to the cared for person which would be affected by these proposals.

The options set out in the Cabinet report to consider a change to the council's non-residential care charging policy by including disability related benefits at the higher or enhanced rate as part of a person's means tested financial assessment are:

Option 1 – To approve a change to the council's non-residential care charging policy by including benefits at the higher or enhanced rate as part of a person's means tested financial assessment.

Option 2 – To maintain the council's current non-residential care charging policy by having the difference between the lower and higher rates effectively ignored for purposes of means testing for non-residential care.

Option 3 – To create a transitional hardship fund to provide additional financial support for those people for whom the introduction of new charges, following a change to the council's non-residential care charging policy by including benefits at the higher or enhanced rate as part of a person's means tested financial assessment, is particularly unfavourable.

Option 4 – Reflecting upon the outcome of the consultation, to defer a decision until the Cabinet meeting on 15 February 2018 when Cabinet will have considered all savings proposals across the council and is able to evaluate them against corporate priorities.

This impact assessment uses the monitoring information received as part of the consultation process undertaken between 16 August – 16 October 2017 and looks at the potential impacts of these proposals on the protected characteristics of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

- This is a new policy proposal

### **Scope of the Equality Impact Assessment**

A stage 1 initial screening EIA was submitted to Cabinet on 15 June 2017 alongside the report from which members decided to seek a consultation on the proposal to change the council's non-residential care charging policy by including disability related benefits at the higher or enhanced rate as part of a person's means tested financial assessment.

The initial assessment recognised that people with a disability were likely to be negatively impacted by the proposal but that all other groups were neutral impact. It is important to recognise that only those disabled people that meet the national eligibility criteria (formerly critical or substantial needs in line with council's eligibility criteria) would potentially be affected by this proposal.

The Cabinet, in considering the report and the EIA together, will consider the full equality monitoring information gathered below as part of the consultation which took place between 16 August – 16 October 2017:

**Age Profile:**

What age group do you belong to?

*Total count: 415*

Under 25	5.06%
25 - 34	8.67%
35 - 44	8.92%
45 - 54	13.25%
55 - 64	10.12%
65 and over	50.60%
Prefer not to say	3.37%

**Disability:**

Do you consider yourself to have a disability, or a long-term illness, physical or mental health conditions?

*Total count: 408*

Yes	76.23%
No	16.42%
Prefer not to say	7.35%

**Marriage & Civil Partnership:**

What is your marital status?

*Total count: 418*

Single	32.30%
Separated	1.20%
Married	28.47%
Civil partnership	0.48%
Co-habiting	2.87%
Divorced	9.09%
Widow/widower	20.57%
Prefer not to say	4.55%
Other	0.48%

**Pregnancy & Maternity:**

Are you pregnant or have recently given birth?

*Total count: 408*

Yes	1.47%
No	70.59%
Not applicable	23.77%
Prefer not to say	4.17%

**Race / Ethnicity:**

How would you describe your ethnic group?

*Total count: 423*

White British	88.89%
Black British	0.00%
Asian British	0.47%
Irish	0.24%
White European	0.47%
Black European	0.00%
White - Black Caribbean	0.24%
White - Black African	0.47%
White & Asian	0.00%
Black Caribbean	0.00%
Black African	0.00%
Arab	0.00%
Indian	0.00%
Pakistani	0.00%
Bangladeshi	0.00%
Chinese	0.24%
Japanese	0.00%
Prefer not to say	6.62%
Other (please specify)	2.36%

**Religion / Belief:**

Do you have a religious belief?

*Total count: 419*

No	31.74%
Prefer not to say	20.05%
Yes	48.21%

**Sex (male / female):**

Which of the following options best describes how you think of yourself?

*Total count: 417*

Male	33.33%
Female	61.15%
Prefer not to say	4.80%
Neither male nor female	0.24%
Both male and female	0.48%

**Sexual Orientation:**

Which of the following options best describes how you think of yourself?

*Total count: 393*

Heterosexual	79.90%
Homosexual	0.25%
Bisexual	0.76%
Prefer not to say	16.28%

**Analysis and assessment**

The analysis and assessment of this EIA has to be seen in the context that services are only offered to people who meet the national eligibility criteria in relation to disability.

The consultation feedback clearly confirms that the proposed changes offered in option 1 and option 2 will have a negative impact on some people who have a disability. All other protected characteristic groups are neutral impact.

The responses to the two month consultation undertaken between 16 August and 16 August 2017 were as follows:

The consultation was aimed at 900 people who receive non-residential care services. A total of 498 responses were received of which 337 responses were received from people via the paper survey and 161 further responses were received online. Importantly, of these responses 201 indicated they were someone who received social care and 107 as being an unpaid carer. This indicates that the views of people who are directly affected by these proposals have been represented in the survey. Overall, the response rate of 55 per cent which is considered to be very good level of engagement.

**1. Response to question 2**

*Which of the following best describes you?*

<i>(457 responses were received to this question)</i>		
	Number responders	
I receive social care which is paid for in full, or in part, by Isle of Wight Council (including Direct Payments)	201	43.98 per cent
I am an unpaid carer, for example a family member or friend, of someone who receives social care paid for by Isle of Wight Council	107	23.41 per cent
I am a representative of an organisation which provides social care services	1	0.22 per cent
I am a representative of a voluntary, independent or community organisation	8	1.75 per cent
I am an Isle of Wight Council employee	8	1.75 per cent
I am an NHS employee	4	0.88 per cent
None of the above	82	17.94 per cent
Prefer not to say	46	10.07 per cent

**2. Response to question 4**

*Do you feel that people on the higher or enhanced rates (of Attendance Allowance, Disability living Allowance or personal independence Payments), should only have the lower, middle or standard rate of that benefit taken into account by Adult Social Care in the calculation of how much a person is required to pay towards the cost of their service (financial assessment)?*

<i>425 responses were received to this question</i>		
	Number responders	
I feel people who are paid at the higher rate or enhanced rate should only have the lower, middle or standard rate of that benefit taken into account (as now)	248	58.35 per cent
I feel people who are paid at the higher rate or enhanced rate should have the full amount of the benefit taken into account (proposal)	70	16.47 per cent
I don't know	107	25.18 per cent

Of the 248 people who responded by indicating that people who are paid at the higher rate or enhanced rate should only have the lower, middle or standard rate of that benefit taken into account (as now), 219 indicated which type of benefit they currently received as follows:

In receipt of higher or enhanced rate of disability benefit	156
In receipt of lower, middle or standard rate of disability benefit	63

Similarly, of the 248 people who responded in this way, 170 indicated that they were either someone who received social care or were an unpaid carer as follows:

Received social care	109
Unpaid carer	61

Of the 70 people who responded by indicating that people who are paid at the higher rate or enhanced rate should have the full amount of the benefit taken into account (proposal), 56 indicated which type of benefit they currently received as follows:

In receipt of higher or enhanced rate of disability benefit	21
In receipt of lower, middle or standard rate of disability benefit	35

Similarly, of the 70 people who responded in this way, 33 indicated that they were either someone who received social care or were an unpaid carer as follows:

Received social care	21
Unpaid carer	12

### 3. Response to question 5 – Disability Related Benefits

*Do you currently receive any disability related benefits?*

<i>458 responses were received to this question</i>		
	Number responders	
Yes	329	71.83 per cent
No	108	23.58 per cent
Not sure	21	4.59 per cent

4. **Response to questions 6, 7 and 8 – Which disability related benefits do you currently receive?**

***Attendance Allowance***

<i>156 people indicated that they received this benefit</i>		
	Number responders	
Higher	105	67.31 per cent
Lower	51	32.69 per cent

***Disability Living Allowance (Care)***

<i>142 people indicated that they received this benefit</i>		
	Number responders	
Higher	71	50.00 per cent
Middle	56	39.44 per cent
Lower	15	10.56 per cent

***Personal Independence Payment***

<i>96 people indicated that they received this benefit</i>		
	Number responders	
Enhanced	60	62.50 per cent
Standard	36	37.50 per cent

Comments received in the consultation feedback were very clear that people were not in favour of making a change to the council's non-residential care charging policy by including disability related benefits at the higher or enhanced rate as part of a person's means tested financial assessment. The council's view was that the proposal would ensure equity in how all disabled related benefit income is treated in that people with a disability who receive these benefits at the higher or enhanced rate have the difference between the lower and higher rates effectively ignored for purposes of means testing for adult social care. By way of contrast, those people with a disability who receive the lower, middle or standard rates of these benefits have all this income taken into consideration in the means test. The responses to the consultation did not agree with this view.

Following the consultation the recommendation to Cabinet is to defer a decision until the Cabinet meeting on 15 February 2018 when Cabinet will have considered all savings proposals across the council and is able to evaluate them against corporate priorities.

If option 1 is approved, those people who have a disability and receive disability related benefits at the higher or enhanced rate will have their charge adjusted to reflect their individual ability to pay. In many

cases this will increase their charge but the council will ensure that national guidance on how social care charges are assessed is followed and enough money is retained by each person to meet everyday living costs. Similarly, any additional disability related costs that a person in this protected characteristic can evidence and that meets the criteria used by the council could mitigate some of the impact. The criteria used is based on good practice guidelines developed by the National Association of Financial Assessment Officers.

Option 2 retains the status quo and, as such, does not have a further positive or negative impact on those people with a disability.

Option 3 has to be considered alongside option 1 above but will mitigate some of the negative effect on those people with a disability.

It is viewed that the consultation response rate of 55 per cent represents a good level of engagement and that this equality impact assessment has recognised the impact on people who meet the protected characteristics.

## **Recommendations**

Following the consultation the recommendation to Cabinet is to defer a decision until the Cabinet meeting on 15 February 2018 when Cabinet will have considered all savings proposals across the council and is able to evaluate them against corporate priorities.

There is no negative or positive impact of this recommendation on those people with a disability who may be required to pay more as a result of the council changing its non-residential care financial assessment process to include disability benefit income at the higher or enhanced rate.

If a decision is taken to change the council's non-residential care charging policy by including disability related benefit income at the higher or enhanced rate as part of its mean tested financial assessment process the negative impact on people with a disability will be mitigated wherever possible by ensuring that national guidance on how social care charges are assessed is followed and enough money is retained by each person to meet everyday living costs. Similarly, any additional disability related costs that a person in this protected characteristic has that meets the criteria used by the council, and is in addition to any such expenses assessed previously, will mitigate some of the impact.

In summary, the council will ensure the financial assessments of all the people negatively affected by this proposal are undertaken in line with Department of Health guidelines to make sure each person has sufficient money to meet their everyday needs.



## Action/Improvement Plan

The table below should be completed using the information from your equality impact assessment to produce an action plan for the implementation of the proposals to:

1. Remove or lower the negative impact, and/or
2. Ensure that the negative impact is legal under anti-discriminatory law, and/or
3. Provide an opportunity to promote equality, equal opportunity and improve relations within equality target groups, i.e. increase the positive impact

Area of impact	Is there evidence of negative positive or no impact?	Could this lead to adverse impact and if so why?	Can this adverse impact be justified on the grounds of promoting equality of opportunity for one group or any other reason?	Please detail what measures or changes you will put in place to remedy any identified impact  (NB: please make sure that you include actions to improve all areas of impact whether negative, neutral or positive)
Age	No impact	NO The proposals would not have a specific impact on people because of their age. It is possible that people in this protected characteristic may be affected by this proposal but only if they have a <b>disability</b> with needs that could be seen as meeting the national eligibility criteria. People in this protected characteristic without disability needs that meet the national eligibility criteria <b>will not</b> be affected.		A person's eligibility for care services, and therefore the need to charge them for any services they are eligible to receive based on their ability to pay, cannot improve any impact on age equality.
Disability	Negative	YES Whilst options 2 and 4 retain the status quo, option 1 will result in a person who is in receipt of a	Option 1 can be justified on the grounds of ensuring that all people with disabilities are treated more fairly by having the	If option 1 is taken to change the council's non-residential care charging policy by including disability related benefit income

Area of impact	Is there evidence of negative positive or no impact?	Could this lead to adverse impact and if so why?	Can this adverse impact be justified on the grounds of promoting equality of opportunity for one group or any other reason?	Please detail what measures or changes you will put in place to remedy any identified impact  (NB: please make sure that you include actions to improve all areas of impact whether negative, neutral or positive)
		<p>higher or enhanced rate of disability benefit payment potentially having to pay more for their care services and this will have a negative effect on people with disabilities who live in the community.</p> <p>Option 3 has to be considered alongside option 1 above but will mitigate some of the negative effect on those people with a disability.</p>	<p>full amount of their disability benefit payment taken into account as part of their financial charging assessment. Currently, people who receive these benefits at the higher or enhanced rate do not have their full care related income taken into account whilst those people who are paid benefits at the lower, middle or standard rate are required to have all their benefit income included in their charging assessment.</p> <p>The current charging policy has been in place for many years and the council is now in a significantly different financial position.</p>	<p>at the higher or enhanced rate as part of its mean tested financial assessment process the negative impact on people with a disability will be mitigated wherever possible by ensuring that national guidance on how social care charges are assessed is followed and enough money is retained by each person to meet everyday living costs. Similarly, any additional disability related costs that a person in this protected characteristic has that meets the criteria used by the council, and is in addition to any such expenses assessed previously, will mitigate some of the impact.</p> <p>In summary, the council will ensure the financial assessments of all the people negatively affected by this proposal are undertaken in line with Department of Health guidelines to make sure each person has sufficient money to meet their everyday needs.</p> <p>Option 3 will require the Director of Adult Social Services to work</p>

Area of impact	Is there evidence of negative positive or no impact?	Could this lead to adverse impact and if so why?	Can this adverse impact be justified on the grounds of promoting equality of opportunity for one group or any other reason?	Please detail what measures or changes you will put in place to remedy any identified impact  (NB: please make sure that you include actions to improve all areas of impact whether negative, neutral or positive)
				with the Lead Member for Resources and the Section 151 Officer to create a transitional hardship fund. This will partly mitigate the effect on people with a disability. This option recognises the views and comments made as part of the consultation that people may suffer hardship.
Gender Reassignment	No impact	NO The proposals would not have a specific impact on people because of gender reassignment. It is possible that people in this protected characteristic may be affected by this proposal but only if they have a <b>disability</b> with needs that could be seen as meeting the national eligibility criteria.		A person's eligibility for care services, and therefore the need to charge them for any services they are eligible to receive based on their ability to pay, cannot improve any impact on gender reassignment equality.
Marriage & Civil Partnership	No impact	NO The proposals would not have a specific impact on people because they are married, in a civil partnership or are unmarried. It is possible that people in this protected characteristic may be affected by this proposal but only if they have a <b>disability</b> with needs that could be seen as meeting		A person's eligibility for care services, and therefore the need to charge them for any services they are eligible to receive based on their ability to pay, cannot improve any impact on marriage or civil partnership equality.

Area of impact	Is there evidence of negative positive or no impact?	Could this lead to adverse impact and if so why?	Can this adverse impact be justified on the grounds of promoting equality of opportunity for one group or any other reason?	Please detail what measures or changes you will put in place to remedy any identified impact  (NB: please make sure that you include actions to improve all areas of impact whether negative, neutral or positive)
		the national eligibility criteria. People in this protected characteristic without disability needs that meet the national eligibility criteria <b>will not</b> be affected.		
Pregnancy & Maternity	No impact	NO The proposals would not have a specific impact on people because they are pregnant or have a young family. It is possible that people in this protected characteristic may be affected by this proposal but only if they have a <b>disability</b> with needs that could be seen as meeting the national eligibility criteria. People in this protected characteristic without disability needs that meet the national eligibility criteria <b>will not</b> be affected.		A person's eligibility for care services, and therefore the need to charge them for any services they are eligible to receive based on their ability to pay, cannot improve any impact on equality for young mothers.
Race	No impact	NO The proposals would not have a specific impact on people because of any particular heritage. It is possible that people in this protected		A person's eligibility for care services, and therefore the need to charge them for any services they are eligible to receive based on their ability to pay, cannot improve any impact on race

Area of impact	Is there evidence of negative positive or no impact?	Could this lead to adverse impact and if so why?	Can this adverse impact be justified on the grounds of promoting equality of opportunity for one group or any other reason?	Please detail what measures or changes you will put in place to remedy any identified impact  (NB: please make sure that you include actions to improve all areas of impact whether negative, neutral or positive)
		characteristic may be affected by this proposal but only if they have a <b>disability</b> with needs that could be seen as meeting the national eligibility criteria. People in this protected characteristic without disability needs that meet the national eligibility criteria <b>will not</b> be affected.		equality.
Religion / Belief	No impact	NO The proposals would not have a specific impact on people because of their faith. It is possible that people in this protected characteristic may be affected by this proposal but only if they have a <b>disability</b> with needs that could be seen as meeting the national eligibility criteria. People in this protected characteristic without disability needs that meet the national eligibility criteria <b>will not</b> be affected.		A person's eligibility for care services, and therefore the need to charge them for any services they are eligible to receive based on their ability to pay, cannot improve any impact on faith or belief equality.
Sex (male or female)	No impact	NO The proposals would not have a specific impact on people because of their gender. It is possible that people in this		A person's eligibility for care services, and therefore the need to charge them for any services they are eligible to receive based on their ability to pay, cannot

Area of impact	Is there evidence of negative positive or no impact?	Could this lead to adverse impact and if so why?	Can this adverse impact be justified on the grounds of promoting equality of opportunity for one group or any other reason?	Please detail what measures or changes you will put in place to remedy any identified impact  (NB: please make sure that you include actions to improve all areas of impact whether negative, neutral or positive)
		protected characteristic may be affected by this proposal but only if they have a <b>disability</b> with needs that could be seen as meeting the national eligibility criteria. People in this protected characteristic without disability needs that meet the national eligibility criteria <b>will not</b> be affected.		improve any impact on sex equality.
Sexual Orientation	No impact	NO The proposals would not have a specific impact on people because of their sex orientation. It is possible that people in this protected characteristic may be affected by this proposal but only if they have a <b>disability</b> with needs that could be seen as meeting the national eligibility criteria. People in this protected characteristic without disability needs that meet the national eligibility criteria <b>will not</b> be affected.		A person's eligibility for care services, and therefore the need to charge them for any services they are eligible to receive based on their ability to pay, cannot improve any impact on equality because of sex orientation.
Please remember - actions should have SMART targets and be reported to the Diversity Board (this should be done via your Directorate representative) and incorporated into your service/team Plans and /or objectives of key staff				

Summary	
<b>Date of Assessment:</b>	24 October 2017
<b>Signed off by Head of Service/Director</b>	
<b>Review date</b>	
<b>Date published</b>	

<b><i>Publishing checklist</i></b>	<b>Yes</b>	<b>No</b>
<ul style="list-style-type: none"> <li>• <i>Plain English – will your EIA make sense to the public?</i></li> <li>• <i>Acronyms – check you have explained any specialist names or terminology</i></li> <li>• <i>Evidence – will your evidence stand up to scrutiny; can you justify your conclusions?</i></li> <li>• <i>Stakeholders and verification – have you included a range of views and perspectives to back up you analysis?</i></li> <li>• <i>Gaps and information – have you identified any gaps in services or information that need to be addressed in the action plan?</i></li> <li>• <i>Success stories – have you included any positive impacts that have resulted in change for the better?</i></li> <li>• <i>Action plan – is action plan SMART? Have you informed the relevant people to ensure the action plan is carried out?</i></li> <li>• <i>Review have you included a review date and a named person to carry it out?</i></li> <li>• <i>Challenge – has your equality impact assessment been taken to Diversity Board/Call Over for challenge?</i></li> <li>• <i>Signing off – has your Head of Service/Director signed off your EIA?</i></li> <li>• <i>Basics – have you signed and dated your EIA and named it for publishing?</i></li> <li>• <i>A signed version to be kept by your team for review and electronic version to be uploaded on to the council’s website</i></li> </ul>		