

## EQUALITY IMPACT ASSESSMENT

The Council has a public sector equality duty under the Equalities Act (2010) to have due regard to:

- Eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act
- Advance equality of opportunity between people who share those protected characteristics and people who do not
- Foster good relations between people who share those characteristics and people who do not.

The three parts of the duty apply to the following protected characteristics: age, disability, gender reassignment, pregnancy/maternity, race, religion/faith, sex and sexual orientation. Marriage and civil partnership status applies to the first part of the duty. In addition, the Council complies with the Marriage (same sex couples) Act 2013.

### Stage 1 – Screening

Please complete the equalities screening form. If screening identifies that your proposal is likely to impact on protected characteristics, please proceed to stage 2 and complete a full Equality Impact Assessment (EqIA).

### Stage 2 – Full Equality Impact Assessment

An EqIA provides evidence for meeting the Council’s commitment to equality and the responsibilities under the Public Sector Equality Duty.

**When an EqIA has been undertaken, it should be submitted as an attachment/appendix to the final decision-making report. This is so the decision maker (e.g. Cabinet, Committee, senior leader) can use the EqIA to help inform their final decision. The EqIA once submitted will become a public document, published alongside the minutes and record of the decision.**

Please read the Council’s Equality Impact Assessment Guidance before beginning the EqIA process.

#### 1. Responsibility for the Equality Impact Assessment

<b>Name of proposal</b>	Charging an annual management fee for managing Department for Work and Pensions (DWP) accounts
<b>Service area</b>	Commissioning
<b>Officer completing assessment</b>	Farzad Fazilat
<b>Equalities/ HR Advisor</b>	Louise Hopton Beatty
<b>Cabinet meeting date (if applicable)</b>	12 November 2019
<b>Director/Assistant Director</b>	Charlotte Pomery

#### 2. Summary of the proposal

*Please outline in no more than 3 paragraphs*

- The proposal which is being assessed*
- The key stakeholders who may be affected by the policy or proposal*
- The decision-making route being taken*

### **Introduce charging administration fees for appointeeship**

The Council, as part of its Medium-Term Financial Strategy (MTFS) agreed to the proposal to introduce administration fees for the management of accounts. Specifically, this is for the Department for Work and Pensions (DWP) appointeeship clients. In June 2019, Cabinet agreed to carry out consultation on this proposal and this EQIA has been updated to reflect the findings from the consultation.

The Council has a duty to manage its finances and recover the cost of the services it provides where appropriate.

Adults have the right to manage their own financial affairs. However, this may be difficult for some individuals due to lack of capacity, illness and or disability.

Where a person becomes unable to manage their own financial affairs and has not put into place a lasting power of attorney, the matter can be taken to the Department for Work and Pensions (DWP) and / or Court of Protection to request a third party is appointed to support the individual.

The third party can be a friend, family member or an organisation (including the council as corporate appointee). Where the individual requiring this support only has DWP income, then an appointee can be appointed by the DWP.

Most local authorities provide a money management service for adult social care users who are unable to manage their own financial affairs. The council recognises the importance of supporting vulnerable adults to manage their finances and to protect them from potential or actual financial abuse.

The council only becomes DWP appointee or court appointed deputy for finances as a last resort where there is no other party (or suitable party due to safeguarding concerns) to undertake this role.

#### **What is appointeeship:**

A Department for Work and Pensions appointee is the person who is appointed by the DWP to manage an individual's DWP income.

The appointee responsibility includes making and maintaining any benefit claims, collecting payments and managing the money including the payment of bills.

#### **Current Practice:**

Currently the council does not charge administration fees for the management of appointeeship clients, although it does for deputyship clients, where there are administration fees for managing deputyship client funds and assets.

The full set of deputyship charges for local authorities are set out by the Court of Protection (Practice Direction 19B Fixed Costs in the Court of Protection).

**Proposal:**

The council is currently able to charge court of protection clients based on legislative guidance issued by the Court of Protection.

It is proposed that the charging arrangements for Appointeeship would mirror the approach already in place for deputyship clients under the Court of Protection. Therefore, the proposed annual management fee, where the council acts as corporate appointee for DWP income/ benefits, would be £650 per annum for the current year. However, where an individual's net savings are below £16,000, the fee will not exceed 3.5% of the client's net savings on the anniversary date the DWP appointed the council as appointee.

The proposed fees would be applicable from 01 December 2019.

There is no national policy governing charging for DWP Appointeeship. Policy and charges are therefore subject to local council decisions under section 93 of the Local Government Act 2003 and section 1 of the Localism Act 2011, which gives the council the power to charge for discretionary services. There is an increasing number of local authorities charging for this service and the charging regimes differ.

Table A in Appendix 1 highlights the approach other LAs are taking.

Where the appointeeship ends before the date the annual fees are due to be charged then pro rata fees will be calculated.

**What will this mean:**

The proposal will impact on current corporate DWP appointee clients where the council manages their DWP income / benefits and future DWP appointee clients.

### 3. What data will you use to inform your assessment of the impact of the proposal on protected groups of service users and/or staff?

*Identify the main sources of evidence, both quantitative and qualitative, that supports your analysis. Please include any gaps and how you will address these*

*This could include, for example, data on the Council's workforce, equalities profile of service users, recent surveys, research, results of relevant consultations, Haringey Borough Profile, Haringey Joint Strategic Needs Assessment and any other sources of relevant information, local, regional or national. For restructures, please complete the restructure EqIA which is available on the HR pages.*

Protected group	Haringey Population	Service users	Staff
Sex	GLA Projections (2017)	Mosaic data of service users	N/A
Gender Reassignment	N/A	Current data on service users does not breakdown by gender reassignment.	N/A
Age	GLA Projections (2017)	Mosaic data of service users	N/A
Disability	N/A		N/A

		Mosaic data of service users	
Race & Ethnicity	GLA Projections (2017)	Mosaic data of service users	N/A
Sexual Orientation	N/A	Current data on service users does not breakdown by sexual orientation.	N/A
Religion or Belief (or No Belief)	GLA Projections (2017)	Current data on service users does not breakdown by religion or belief.	N/A
Pregnancy & Maternity	N/A	Current data on service users does not breakdown by pregnancy and maternity.	N/A
Marriage and Civil Partnership	N/A	Current data on service users does not breakdown by marriage and civil partnership.	N/A

**Outline the key findings of your data analysis. Which groups are disproportionately affected by the proposal? How does this compare with the impact on wider service users and/or the borough's demographic profile? Have any inequalities been identified?**

*Explain how you will overcome this within the proposal.*

*Further information on how to do data analysis can be found in the guidance.*

### A. Sex

**Table 1.1** - shows the overall Haringey data for gender

Gender	All Haringey	%
All people	222,075	
Males	112,270	51
Females	109,805	49

**Table 1.2** - shows the gender of Adult Social Care users and of the 188 people who used the Appointeeship Service as of 9.8.18.

Gender	Total Adult Social Care Service Users	Total Adult Social Care Users (%)	Service users using the Appointeeship service (188)	Service users using the Appointeeship service (188) %

Male	1502	48	101	54
Female	1654	52	87	46
Unidentified	3	0	0	0

## B. Age

**Table 1.3** - shows the overall Haringey data for age.

Age	All Haringey	%
Total	222,075	
18-20	8,930	4
21-60	177,561	80
61+	35584	16

**Table 1.4** - shows the age groups of the 3156 service users in receipt of social care and those service users who the council acted as DWP appointee (188 users as at 9.8.19).

Age	Total Adult Social Care Service Users	Total Adult Social Care Users (%)	Service users using the Appointeeship service (188)	Service users using the Appointeeship service (188) %
18-20	59	-	-	-
21-60	1278	40	59	31
61+	1819	60	129	69

## C. Race and Ethnicity

**Table 1.5** - shows the overall Haringey data for race and ethnicity.

Race and Ethnicity	Haringey (2017 GLA Projections) %
White	65%
Mixed / Multiple	5%
Asian / Asian British	10%
Black / African / Caribbean / Black British	16%
Other Ethnic Group	5%

**Table 1.6** - shows the race and ethnicity of the 3156 service users in receipt of social care and those service users who the council acted as DWP appointee (188 users as at 9.8.19).

	Total Adult Social Care Service Users	Total Adult Social Care Users (%)	Service users using the Appointeeship service (188)	Service users using the Appointeeship service (188) %
<b>Race and Ethnicity</b>				
White	1466	46	102	54
Mixed / Multiple	66	2	2	1
Asian / Asian British	227	7	7	4
Black / African / Caribbean / Black British	1086	34	57	30
Other Ethnic Group	119	4	9	5
No data	195	6	11	6

#### D. Sexual orientation

3.2% of London identified as either Gay, Lesbian, Bisexual or Other (not heterosexual) in 2017.

Data on sexual orientation among appointees is not available, so it is therefore not possible to say whether this group is more likely to be appointees or not.

#### E. Gender reassignment

Gender Reassignment: No real data “Data on gender identity are still currently limited, though data collection methodology and question design are developing. Some work is being undertaken around gender identity and capturing trans or non-binary identities by other national statistics agencies for their respective censuses; work often involves a consideration or review of the sex question or response categories.”

Data on gender reassignment among appointees is not available, so it is therefore not possible to say whether this group is more likely to be appointees or not.

#### F. Religion or belief (or no belief)

**Table 1.7** – shows the overall data for Haringey

	<b>Haringey (2017 GLA Projections) %</b>
<b>Religion or belief (or no belief)</b>	
Not Stated	8.9
Christian	45
Catholic	No breakdown
Hindu	1.80
Jewish	3.00

Muslim	14.20
Sikh	0.30
Buddhist	1.10
Greek Orthodox	No breakdown
Other	0.50
No Religion	25.20

**Table 1.8** - shows the religion or belief (or no belief) of the 3156 service users in receipt of social care and those service users who the council acted as DWP appointee (188 users as at 9.8.19).

Religion or belief (or no belief)	Total Adult Social Care Service Users	Total Adult Social Care Users (%)	Service users using the Appointeeship service (188)	Service users using the Appointeeship service (188) %
Christian	876	28	53	28
Catholic	170	5	15	8
Hindu	47	1	3	2
Jewish	70	2	4	2
Muslim	304	10	8	4
Sikh	8	0		
Buddhist	7	0		
Greek Orthodox	97	3	2	1
Other	77	2	2	1
No Religion	129	4	8	4
Not stated	1367	43	93	49
Rastafarian	7	0		
No data	3159	100	188	100

#### G. Pregnancy and maternity

Data on pregnancy and maternity among appointees is not available, so it is therefore not possible to say whether this group is more likely to be appointees or not.

#### H. Marriage and Civil Partnership

Data on marriage and civil partnership among appointees is not available, so it is therefore not possible to say whether this group is more likely to be appointees or not.

**4. a) How will consultation and/or engagement inform your assessment of the impact of the proposal on protected groups of residents, service users and/or staff?**

*Please outline which groups you may target and how you will have targeted them*

**Further information on consultation is contained within accompanying EqIA guidance**

The public consultation was open from 22 July 2019 to 8 September 2019 and comprised: a dedicated webpage explaining the consultation and access to an online version of the survey and a separate questionnaire. The questionnaire was sent to 3150 service users with free post return envelope. A direct number for service users to call and ask questions or help to complete the questionnaires.

In addition, three drop-in sessions for service users to complete the questionnaire and ask questions about the two proposals were convened. The drop-in sessions were held at Marcus Garvey Library, Wood Green Library and Hornsey Library to ascertain the views of current service users, their carers of the adults who receive service in Haringey.

**4. b) Outline the key findings of your consultation / engagement activities once completed, particularly in terms of how this relates to groups that share the protected characteristics**

*Explain how will the consultation's findings will shape and inform your proposal and the decision-making process, and any modifications made?*

The proposed fee will impact on service users who use the council's DWP Appointeeship service.

The consultation resulted in 312 responses. Those who responded were broadly representative of service users in terms of age, disability and ethnicity.

**General feedback from consultation:**

The proposal to introduce administration fee was not supported by 73% of the 312 people who responded (60% strongly disagreed and 13% disagreed).

**Age**

246 people indicated their age. 67% of the respondents were aged over 60. This proportion was expected as this age group is also over-represented in the wider cohort of all Adults Social Care users and service users who also receive a DWP service.

There was a minimal difference between male and female responses, with 66% of males disagreeing with the change and 70% of females.

In all age groups at least half of respondents disagreed with the change, however younger respondents were more likely to agree with the change, with 50% of 21-24 year olds and 52% of 30-44 year olds disagreeing. A bigger majority of the 60+ respondents disagreed with 83% of 90+ year olds, 86% of 85-89 year olds and 83% of 60-64 year olds disagreeing.

**Sex**

246 people responded to this question. Of the 246, 39% were female, 40% were male and 21% did not supply this information. The 40% response from males is a slight under-representation compared to the overall profile of all Adult Social Care users of which 48% are male see table 1.2 above for details).

### **Disability**

271 people supplied this information. 88% of respondents considered themselves to have a disability. This was expected as care and support are provided to vulnerable adults because they have care and support needs arising from age or disability and also require the management of their DWP income.

Notably people without a disability disagreed more with the change, with 89% disagreeing (83% strongly disagree) compared to 68% for those with a disability, although both disagree overall

### **Race and Ethnicity**

The people who supplied this information were 38% white and 28% Black / African / Caribbean. This proportion is expected as these groups reflect broadly the profile of people being provided the Appointeeship Service, as well as of those receiving Adult Social Care. This is also supported by the overall Haringey data from the Haringey (2017 Greater London Authority) projections (see table 1.6 for details).

All ethnicities disagreed with the change with 50% either disagreeing or strongly disagreeing. Mixed ethnicities disagreed the least with only 55% disagreeing (27% strongly disagreeing) however this was only 11 responses. White ethnicity disagreed the most with 74% of respondents disagreeing (59% strongly disagree).

### **Religion or belief (or no belief)**

312 people supplied this information of whom 46% were Christian and 11% Muslim. 27% did not state their religion (see table 1.8 for details). Haringey is a religiously diverse area, with the largest religion being Christianity. The response was expected as this reflects the profile of people being provided the Appointeeship Service, as well as of those receiving Adult Social Care.

Breaking down by religion, all religions had over 50% of respondents disagree with the change.

## **5. What is the likely impact of the proposal on groups of service users and/or staff that share the protected characteristics?**

*Please explain the likely differential impact on each of the 9 equality strands, whether positive or negative. Where it is anticipated there will be no impact from the proposal, please outline the evidence that supports this conclusion.*

Further information on assessing impact on different groups is contained within accompanying EqlA guidance

Those affected will be either current or future service users of Adult Social care and where the council manages their DWP income.

Social care is provided to people as a result of long-term health conditions, disability and age; as a result, these categories will be impacted.

The proposal to introduce the DWP administration fee will impact on service users who currently have their DWP income managed by the council.

At present there are 3156 service users who are in receipt of Adult social care. Of the 3156 people, 188 (6%) will be directly affected by this proposal.

### **1. Sex**

As of August 2018, of the 188 service users whose income is managed by the council through DWP Appointeeship, there were 101 male users (54%) and 87 female users (46%). This proposal

will therefore impact a slightly larger proportion of males. This is in contrast with the wider population receiving adult social care, where females are over-represented. 1654 Adult Social Care Service Users were female (54%) and 1502 were male (46%).

This compares to a broadly even gender split in the wider Haringey population, where 49% of residents are female and 51% are male.

There is limited concern around this protected characteristic, as males are only slightly more likely to be affected than females.

Positive		Negative	X	Neutral impact		Unknown Impact	
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## 2. Gender reassignment

Data on gender reassignment among appointees is not available, so it is therefore not possible to say whether this group is more likely to be appointees or not. While there is not data to suggest that transgender people are more likely to be recipients of adult social care, according to the charity Stonewall this group is more likely to lack support from their families, and therefore could be more likely to become appointees.

Positive		Negative		Neutral impact		Unknown Impact	X
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## 3. Age

As of 9 August 2018, of the 188 service users where the council manages their DWP income, 129 are 61+ (69%) and 59 are under 61 years of age (31%). This age group is also over-represented in the wider cohort of Adult Social Care users: of the 3156 Adult Social Care Users, 1819 are 61+ (60%).

While the proposal will impact all age groups, it is expected that the impact will fall mostly on those aged 61+ because of the profile of Adult Social Care users.

Positive		Negative	X	Neutral impact		Unknown Impact	
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## 4. Disability

Care and support are provided to vulnerable adults all of whom have a disability. Adults who receive this service and where their DWP income is managed by the council through DWP Appointeeship will be affected by this proposal.

Positive		Negative	X	Neutral impact		Unknown Impact	
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## 5. Race and ethnicity

As of 09 August 2018, the ethnicity of the 188 service users was as follows:

Asian / Asian British	7	4%
Black / African / Caribbean / Black British	57	30%
Mixed / Multiple	2	1%
White	102	54%
Other Ethnic Group	9	5%
Unidentified	11	6%

The impact of this proposed change will impact across all ethnicity groups, however, there is likely to be a greater impact for the following groups: Black / African / Caribbean / Black British and White British as this profile reflects the profile of those people receiving the Appointeeship Service, as well as receiving Adult Social Care. This also supported by the overall Haringey data from the Haringey (2017 Greater London Authority) projections.

Positive		Negative	X	Neutral impact		Unknown Impact	
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### 6. Sexual orientation

Data on sexual orientation among appointees is not available, so it is therefore not possible to say whether this group is more likely to be appointees or not. There is not data to suggest that LGBT people are more likely to be appointees, and therefore this group is not expected to be disproportionately impacted by the proposal.

Positive		Negative		Neutral impact		Unknown Impact	X
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### 7. Religion or belief (or no belief)

The impact of this proposed change will impact across all religious groups however, more Christians will be affected as they comprise the largest proportion of people receiving the Appointeeship Service, as well as Adult Social Care. This also supported by the overall Haringey data from the Haringey (2017 Greater London Authority) projections. It is noted that over 40% people who receive adult social care and the appointeeship service have not stated their religion.

Positive		Negative	X	Neutral impact		Unknown Impact	
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### 8. Pregnancy and maternity

Data on pregnancy and maternity among appointees is not available, so it is therefore not possible to say whether this group is more likely to be appointees or not. However, given that the majority of appointees are aged 61+, there is not an expectation that this group is more likely to be appointees, and therefore the proposal is not expected to have a disproportionate impact on this area.

Positive		Negative		Neutral impact		Unknown Impact	X
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### 9. Marriage and Civil Partnership

Data on marriage and civil partnership status among appointees is not available, so it is therefore not possible to say whether one group is more or less likely to be appointees. There is not data to suggest that those in a marriage or civil partnership are more likely to be appointees, and therefore this group is not expected to be disproportionately impacted by the proposal.

Positive		Negative		Neutral impact		Unknown Impact	X
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### 10. Groups that cross two or more equality strands e.g. young black women

Older people with a disability are numerically more likely to be impacted by the proposed changes, as well as Black/African/Caribbean/Black British people.

**Outline the overall impact of the policy for the Public Sector Equality Duty:**

- Could the proposal result in any direct/indirect discrimination for any group that shares the relevant protected characteristics?
- Will the proposal help to advance equality of opportunity between groups who share a relevant protected characteristic and those who do not?

This includes:

- a) Remove or minimise disadvantage suffered by persons protected under the Equality Act
  - b) Take steps to meet the needs of persons protected under the Equality Act that are different from the needs of other groups
  - c) Encourage persons protected under the Equality Act to participate in public life or in any other activity in which participation by such persons is disproportionately low
- Will the proposal help to foster good relations between groups who share a relevant protected characteristic and those who do not?

Implementation of this proposal would affect current and future adult social care service users aged 18 and over, where the council manages their benefit income through Department for Work and Pensions (DWP) Appointeeship.

Analysis indicates that the introduction of administration fees will impact on the protected characteristics of disability, age and ethnicity.

### 6. a) What changes if any do you plan to make to your proposal as a result of the Equality Impact Assessment?

Further information on responding to identified impacts is contained within accompanying EqlA guidance

Outcome	Y/N
<b>No major change to the proposal:</b> the EqlA demonstrates the proposal is robust and there is no potential for discrimination or adverse impact. All opportunities to promote equality have been taken. <u>If you have found any inequalities or negative impacts that you are unable to mitigate, please provide a compelling reason below why you are unable to mitigate them.</u>	N
<b>Adjust the proposal:</b> the EqlA identifies potential problems or missed opportunities. Adjust the proposal to remove barriers or better promote equality. Clearly <u>set out below</u> the key adjustments you plan to make to the policy. If there are any adverse impacts you cannot mitigate, please provide a compelling reason below	Y -see comments below, people will not be charged if who have £3000 or less in savings.
<b>Stop and remove the proposal:</b> the proposal shows actual or potential avoidable adverse impacts on different protected characteristics. The decision maker must not make this decision.	N

**6 b) Summarise the specific actions you plan to take to remove or mitigate any actual or potential negative impact and to further the aims of the Equality Duty**

<b>Impact and which relevant protected characteristics are impacted?</b>	<b>Action</b>	<b>Lead officer</b>	<b>Timescale</b>
The implementation of the fee will be monitored to ensure that people are not put at risk by the introduction of the fee.	Records will be kept of appeals and any challenges.	Raj Darbhanga	From date of implementation and ongoing.
The council will undertake appropriate due diligence to ensure, where clients and their representatives want to take back their appointeeship, that the client is not subject to or at risk of being subjected to financial abuse or put at risk because of a lack of support to meet their financial commitments, in line with our safeguarding duties.	Records will be kept of appeals and any challenges.	Raj Darbhanga	From date of implementation and ongoing.

**Please outline any areas you have identified where negative impacts will happen as a result of the proposal, but it is not possible to mitigate them. Please provide a complete and honest justification on why it is not possible to mitigate them.**

The council recognises that this proposal will disproportionately impact on people with protected characteristics based on age, gender, disability, race and ethnicity but only in so far as these are the users of adult social care in the borough who are more likely to be older, female, disabled and from certain backgrounds.

The mitigating actions outlined above have been identified. The council recognises that the people who access the appointeeship service are vulnerable and factoring in consultation feedback, the council will not charge the fee to individuals who have £3000 or less in savings. This will ensure that people are not put at risk by the introduction of the fee.

In addition, the service will have the discretion to reduce or waive the fees for those who are unable to afford them. The service will also monitor the implementation of the fee.

The council will undertake appropriate due diligence to ensure, where clients and their representatives want to take back their appointeeship, that the client is not subject to or at risk of being subjected to financial abuse or put at risk because of a lack of support to meet their financial commitments, in line with our safeguarding duties.

People will have the right to make a complaint if they believe that the fee has been applied incorrectly or unfairly.

**6 c) Summarise the measures you intend to put in place to monitor the equalities impact of the proposal as it is implemented:**

Equality profile of those receiving the service will be monitored to identify if there any disproportionate impacts.

## **7. Authorisation**

EqlA approved by Date 1<sup>st</sup> November 2019



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(Assistant Director/ Director)

## **8. Publication**

*Please ensure the completed EqlA is published in accordance with the Council's policy.*

Please contact the Policy & Strategy Team for any feedback on the EqlA process.

## Appendix 1:

Table A

LA Name	Charge for DWP Appointeeship	Details of Charge
Enfield	Yes	3.5% under 16K and £650 per year for above £16k
Bromley	Yes	Charge £775 for first year £650 for second year and subsequent years For balances below £16K then 3.5% charged on balance held.
Croydon	Yes	Charge £775 for first year £650 for second year and subsequent years For balances below £16K then 3.5% charged on balance held.
Camden	No	N/A
Islington	No	N/A
Hackney	No	N/A
Waltham Forest	No	N/A
Ealing	No	N/A
Reading		Charge £775 for first year £650 for second year and subsequent years For balances below £16K then 3.5% charged on balance held.
Hertfordshire County Council	Yes	Use bands 1 to 5: 1. £0 to £500 No charge 2. £501 to £2,999.99 Charge -- £50 per year 3. £3,000 to £9,999.99 Charge - £260 per year (£5 per week) 4. £10,000 to £15,999.99 Charge - 3% of cash funds held 5. £16,000 + Charge - £585 per year
Huddersfield	Yes	£10 per week for non-residential clients and £5 per week for residential clients. Clients with assets below £1K are not charged.
Nottingham	Yes	Charge £12.00 every four weeks based on a full assessment of what the service costs the council to run.
Buckinghamshire	Yes	£2.50 per week