

EQUALITY IMPACT ASSESSMENT

The **Equality Act 2010** places a '**General Duty**' on all public bodies to have '**due regard**' to:

- Eliminating discrimination, harassment and victimisation and any other conduct prohibited under the Act
- Advancing equality of opportunity for those with 'protected characteristics' and those without them
- Fostering good relations between those with 'protected characteristics' and those without them.

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 the Public Sector Equality Duty, please proceed to stage 2 and complete a full Equality Impact Assessment.

Stage 2 – Full Equality Impact Assessment

An Equality Impact Assessment provides evidence for meeting the Council's commitment to equality and the responsibilities under the Public Sector Equality Duty.

When an Equality Impact Assessment 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 EqlA to help inform their final decision. The EqlA 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 EIA process.

1. Responsibility for the Equality Impact Assessment

Name of proposal	Fees & Charges: Disability Related Expenditure,
Service area	P2 – Adult Social Services
Officer completing assessment	Raj Darbhanga
Equalities/ HR Advisor	Paul Green
Cabinet meeting date (if applicable)	14 th November 2017
Director/Assistant Director	John Everson

2. Summary of the proposal and its relevance to the equality duty

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*
- Its relevance to the Public Sector equality duty and the protected groups*

The MTFS proposal which sits within the wider MTFS and Charges seeks to amend fees and charges related to Disability Related Expenditure Disregard to deliver savings. This EqIA has acted as a working document and has been updated following consultation.

Proposal:

Disability Related Expenditure MTFS Proposal Summary:

The Disability Related Expenditure MTFS proposal sits within the wider MTFS Fees and Charges proposal which seeks to amend a number of fees and charges to bring them into line with other London Boroughs and to enable cost recovery where possible and appropriate.

The proposal will seek to deliver £328k savings.

Haringey currently operates a 65% (£35.82) disregard and this policy has stayed the same since 2011. Other authorities have reduced the DRE and the range is from a flat rate of £10.00 to a rate of 35% (£19.00)

The proposal as outlined in the MTFS is for Haringey:

To operate a DRE of 40%, (£22.04 per week) by 2019/20 (i.e. 55% (£30.31 per week) saving an estimated £129k in 2017/18, 45% (£30.31 per week) saving an estimated £244k in 2018/19).

To mitigate the impact of the changes the proposal is to incrementally introduce the reductions, as outlined in the above.

In addition, in reviewing the proposal and developing the Equality Impact Assessment Haringey will also offer an individualised detailed DRE assessment to identify any additional costs above the standard disregard to reduce the contribution if this is preferable to the service user. This will help prevent any financial hardship caused by the decision.

Context:

Disability Related Expenditure

People who are allocated a personal budget for care and support funded by Haringey Council, have a financial assessment to see how much they should contribute towards the cost their care and support. The approach for the financial assessment is set out in the Council's Fairer Contributions Policy which is based on guidance set out in the Care Act 2014.

The financial assessment looks at the money an individual has coming in as well as their expenses. The expenses also include Disability Related Expenditure (DRE). DRE is the extra costs people have each week because of a disability, illness or age. For example, people may pay extra laundry costs or extra heating because of their disability (other examples are listed below in appendix 1). It is important that the Council takes this expenditure into account in order to ensure service users retain income to meet these costs.

To be eligible for DRE, people must be in receipt of Attendance Allowance or the care components of

Disability Living Allowance or Personal Independence Payment.

In addition to the DRE disregarded income, the financial assessment also disregards an amount for 'minimum income guarantee' as set out by the Department of Health.

Current practice:

To ensure that the financial assessment process for Disability Related Expenditure is as easy and discreet as possible for service users, the Council uses a flat rate disregard. The use of a flat rate reduces the need for quite personal and sensitive discussions. This approach is to ensure that there is equitable treatment between service users. While a flat rate is applied as part of the financial assessment, individuals are offered the opportunity to complete a detailed individualised DRE assessment and any additional DRE above the standard level is also disregarded to bring a lower contribution.

At present, a standard proportion of Attendance Allowance, Disability Living Allowance Care Component or the Personal Independence Payment Daily Living Component is disregarded across all assessments with the offer of a detailed Disability Related Expenditure assessment offered to all clients who pay towards the cost of their care. The proportion currently disregarded equates to 65% (on average £35.82 per week where the lower rate of Attendance Allowance or middle rate of Disability Living Allowance care component or lower rate of the Personal Independence Payment Daily Living component is included in the financial assessment).

Rationale for Proposal:

The current standard disregard for DRE described above has been in place since April 2011 and research has confirmed that Haringey is much more favourable (i.e. has a much higher disregard) than other London Boroughs.

Therefore, the proposal seeks to bring the disregard for DRE more in line with other London Boroughs. The reduction will result in an increase in charges for service users who are currently making a contribution and have a DRE disregard included in their financial assessments. In addition, when DRE reduces to 40%, this will result in some service users of working age who are currently assessed not to contribute having to make a small contribution. If the decision is approved, as shown in the table below, the reduction in DRE will still be more favourable than other London Boroughs.

Authority	DRE Disregard Policy	Person retains this amount per week to pay for Disabled Related Expenditure
Haringey	65% (current)	£35.82
Haringey 2017/18	55% (post decision)	£30.31
Haringey 2018/19	45% (post decision)	£24.80
Haringey 2019/20	40% (post decision)	£22.04

Hackney	25%	£13.78
Hounslow	30%	£16.53

Ealing	35%	£19.29
Merton	Flat Rate	£10.00
Newham	Flat Rate	£15.00
Greenwich	Flat Rate	£15.30
Barking & Dagenham	Flat Rate	£15.00

What will the proposal mean:

People will have to pay more towards the cost of their care they receive. All service users paying a contribution towards the cost of care where DRE has been used to calculate the contribution will see an increase in their contribution if the disregard is reduced.

People will have to pay more towards the cost of their care. All service users paying a contribution towards the cost of care where DRE has been used to calculate their charge will see an increase if the disregard is reduced.

Mitigations:

To mitigate the impact of the increase in charges to service users, consideration has been given to the impact of reducing the standard disregard from 65% to a sum which reflects a reasonable amount of weekly expenditure as outlined above. The following outlines the mitigations:

Incremental Reduction of DRE:

The proposal will also reduce the standard 65% to 40% by 2019/2020 over a number of years (as set out below) rather than an immediate reduction from 65% to 40%.

Proposal to reduce DRE in increments:

2017/2018 – reduce the disregard to 55% (from £35.82 to £30.31)

2018/2019 – reduce the disregard to 45% (to £24.80)

2019/2020– reduce the disregard to 40% (to £22.04)

Individual Assessments offered as an alternative:

In addition, although operating a percentage disregard approach facilitates a quicker process with regards to financial assessments, to further mitigate the reduction, it is planned to increase personnel to offer individual assessments to those people who would find this preferable.

Where people opt to have an individual assessment, they will be able to provide a detailed breakdown and evidence of their relevant disability related expenditure and to identify any additional areas of expenditure that are a result of their disability, age or health.

It is acknowledged that this approach could result in increased requests for detailed individual assessments, hence the need to secure additional personnel as part of this approach.

However, as people would have an option for a detailed individual assessment we are actively seeking to mitigate any potential adverse effects of the proposal on the vulnerable people we support.

Illustrative examples of the Impact of Disability Related Expenditure (DRE) changes:

The following examples are for illustrative purposes. The examples are calculated in line with Council's Contribution policy, which is based on Care Act guidance. Charges are calculated on the ability to pay.

Examples (please note that all figures relate to benefit rates effective from April 2016 and DH Minimum Income Guarantee rates):

Retirement Age

At present a 75-year-old woman living alone receiving Pension Credit of £217.45 plus Attendance Allowance of £55.10 would pay £47.73.

Reducing the disregard from 65% to 55% would increase her charge to £53.24 (increase of £5.51).
 Reducing the disregard from 65% to 45% would increase her charge to £58.75 (increase of £11.02).
 Reducing the disregard from 65% to 40% would increase her charge to £61.51 (increase of £13.78).

Working Age and in receipt of Employment and Support Allowance

At present a 55-year-old man living alone receiving Employment Support Allowance Credit of £186.90 plus Disability Living Allowance Care of £55.10 would pay £54.73.

Reducing the disregard from 65% to 55% would increase his charge to £60.24 (increase of £5.51).
 Reducing the disregard from 65% to 45% would increase his charge to £65.75 (increase of £11.02).
 Reducing the disregard from 65% to 40% would increase his charge to £68.51 (increase of £13.78).

Who will be affected?

As described if the proposal to reduce the DRE is approved, any person who is currently assessed to pay towards their care and support costs and a DRE is included in their financial assessment, will have an increase in their contribution.

At 01 January 2017 there were approximately 1879 people in receipt of care in the community (i.e. non-residential care). Analysis of data indicates that a standard DRE is currently applied to approximately 700 financial assessments of which 461 make a contribution towards the cost of their care. Any changes will mainly impact on this group. In the 700 financial assessments, there are service users that are currently not required to pay but will be required to pay when the DRE is reduced to 45% and 40%.

Changes to the benefit rates and DH guidance in 2017/18, 2018/19 and 2019/20 could affect the above illustrations/examples, in addition any increase to the charge as a result of reducing the standard DRE, will be in addition to any annual increase (normally from April each year) in line with increases in benefit and other income.

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. 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.

Further information on data sources is contained within accompanying EqIA guidance.(part 8)

Protected group	Service users	Staff
Sex		N/A

	Mosaic data of service users	
Gender Reassignment	Current data on service users does not breakdown by gender reassignment.	N/A
Age	Mosaic data of service users	N/A
Disability	Mosaic data of service users	N/A
Race & Ethnicity	Mosaic data of service users	N/A
Sexual Orientation	Current data on service users does not breakdown by sexual orientation.	N/A
Religion or Belief (or No Belief)	Current data on service users does not breakdown by religion or belief.	N/A
Pregnancy & Maternity	Current data on service users does not breakdown by pregnancy and maternity.	N/A
Marriage and Civil Partnership	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.

Data for Disability Related Expenditure

A. Sex

Table 1.1 - shows the overall Haringey data for gender.

Gender	All Haringey	%
All people	254,900	
Males	126,175	49.5
Females	128,725	50.5

Table 1.2 - shows the gender of the 1879 service users in receipt of non-residential care and those service users who have been assessed to pay and have a standard DRE included in their financial assessment as at 01 January 2017.

	Total non-residential service users (1879)	Total non-residential service users (%)	DRE currently applied and assessed to pay (461)	DRE currently applied and assessed to pay (%)
Gender				
Male	855	46	181	46
Female	1022	54	280	54
Unidentified	2	0		

B. Age

Table 1.3 - shows the overall Haringey data for age.

Age	All Haringey	%
Total	254,900	
0-20	63,400	24.9
20-59	159,900	62.7
60-64	9,200	3.6
65-79	17,100	6.7
80+	5,300	2.1

Table 1.4 - shows the age groups of the 1879 service users in receipt of non-residential care and those service users who have been assessed to pay and have a standard DRE included in their financial assessment as at 01 January 2017.

Age	Total of non-residential users (1879)	% Total of non-residential users (%)	DRE currently applied and assessed to pay (461)	DRE currently applied and assessed to pay (%)
<20	20	1.1		
20-29	178	9.47	51	11.1
30-39	165	8.73	34	7.4
40-49	209	11.1	25	5.42
50-59	300	16	37	8
60-64	131	6.97	27	5.86
65-69	117	6.23	30	6.51
70-79	256	13.6	83	18
80-89	362	19.3	124	26.9
90+	141	7.5	50	10.85

C. Ethnicity

Table 1.5 - shows the overall Haringey data for ethnicity.

Ethnicity	Haringey Population	Haringey %
	2011	2011
	Total - 254,926	Total - 254,926
White	154,343	60.5
Mixed / Multiple	16,548	6.5
Asian / Asian British	24,150	9.5
Black / African / Caribbean / Black British	47,830	18.8
Other Ethnic Group	12,055	4.7

Table 1.6 - shows the ethnicity of the 1879 service users in receipt of non-residential care and those service users who have been assessed to pay and have a standard DRE included in their financial assessment as at 01 January 2017.

Ethnicity	Total non-residential service users (1879)	Total non-residential service users (%)	DRE currently applied and assessed to pay (461)	DRE currently applied and assessed to pay (%)
White	881	46	227	49.3
Mixed / Multiple	35	2	14	3
Asian / Asian British	146	8	32	6.9
Black / African / Caribbean / Black British	686	37	160	34.8
Other Ethnic Group	75	4	21	4.5
Unidentified	56	3	7	1.5

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 provide a brief outline of:

- *How you intend to consult with those affected by your proposal including those that share the protected characteristics*

Further information on consultation is contained within accompanying EqIA guidance (part 9)

Disability related expenditure consultation

Consulting through survey using a paper questionnaire and on-line. It will target the people who will be affected or likely to be affected by the proposal.

The consultation on the proposed changes ran from 17 July to 4 September 2017. The consultation was sent out by post and was available online. Public drop in sessions were offered at Hornsey, Wood Green and Marcus Garvey libraries. One to one interviews were also offered at these drop-ins with a support independent advocacy.

A direct number was made available for service users to call and ask questions or complete the questionnaire.

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?

Disability related expenditure consultation

685 service users were sent a hard copy of the questionnaire and a free post envelope to return it.

The consultation resulted in 138 responses - a 20% response.

Age

127 people indicated their age.

64% of the respondents were aged over 60.

Comparing this to the data available at 1 January 2017 where 54% of the service users were 60+, a slightly higher response was received from people aged 60+. However, this should have been expected as the impact will fall mostly on the 60+ as they are predominant in the people being provided with a service and being charged. This is supported by the analysis of data set out in appendix 2, table 1.4.

Disability

128 people supplied this information.

96% of respondents considered themselves to have a disability. This was expected as care and support is provided to vulnerable adults all of whom have a disability.

Sex

125 people supplied this information.

64% of respondents were female and 36% male. The 64% is an over representation as at 1 January 2017, 54% of the service users were female.

Ethnicity

137 people supplied this information:

	Respondents %	Service users %
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White / White other	69	46
Black	52	37
Asian	13	8
Mixed	3	2

We did not collect other protected groups data because we do not have this data for the wider population of service users and therefore cannot do comparisons. No issues related to the other 5 protected groups was raised through the consultation.

75% of the respondents did not agree with the proposal to bring the disability related expenditure disregard in line with other London boroughs.

60% of people who responded did not believe they would be able to manage the increase in care charges.

82% of the respondents agreed that the increase should be staggered and not introduced in one go from December 2017.

47% of the respondents indicated that they are likely to request a detailed assessment to make sure that all their needs and requirements are being assessed properly and fairly.

There were comments regarding the Council's treatment of vulnerable people and about disabilities becoming worse. The Council is taking steps to mitigate this happening as outlined below. The financial assessment works within a common framework of ability to pay and affordability

Mitigation

To mitigate the increase in charges as a result of the proposal, service users will be advised of their revised financial assessment before the increase is applied.

The offer of an individual disability related expenditure assessment will continue to be made to people to identify additional expenses related to disability over and above the standard disregard and if appropriate reduce the contribution.

82% respondents agreed with the approach that the increase of approximately £14 per week to bring it line with other boroughs should not be introduced in a single step and staggered over 3-year period. This would allow people for more time to budget and become accustomed to having to pay more or having to make contributions where they have previously not had to do so.

The Fairer Contributions Policy aims to ensure fairness and transparency when assessing contributions. Everyone will have a guaranteed minimum income designed to ensure that no one will be asked to pay more than they can afford.

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 EqIA guidance (part 10)

Those affected will be either current or future service users of Adult Social funded care. 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 reduce the DRE disregard will impact on service users who currently have a DRE disregard applied to their financial assessment irrespective of their age, disability, ethnic origin and gender.

The service users who are in receipt of Attendance Allowance or the care components of Disability Living Allowance or Personal Independence Payment Daily Living component and a DRE disregard is applied to their financial assessment will be affected by this proposal.

At present there are 1879 service users who are in receipt of non-residential care. Of the 1879 people, 461 will be affected by this proposal.

Key findings:

1. Sex

As of 1 January 2017, of the 1879 total service users there are 855 (46%) male users and 1022 (54%) females. Comparing this to the overall Haringey data from the 2011 census, where 51.1% are male and 49.9% are female, it was anticipated that this proposal will more likely affect females. This is expected given that there are more female users of Adult Social Services funded care and it is recognised that women live longer than men.

Data analysis (see section 3 table 1.2) shows that of the 461 affected, 280 (54%) are female and 181 (46%) are male and confirms that women will be more affected by this proposal.

No issues directly relating to sex was outlined in the consultation.

We will undertake measures to ensure that no hardship will be felt through the Fairer Contributions Policy. The Fairer Contributions Policy aims to ensure fairness and transparency when assessing contributions. Everyone will have a guaranteed minimum income designed to ensure that no one will be asked to pay more than they can afford.

Positive		Negative	X	Neutral impact		Unknown Impact	
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2. Gender reassignment

This data is not available. We do not envisage a negative impact based upon this protected characteristic. No issues directly relating to gender reassignment was outlined in the consultation.

We will undertake measures to ensure that no hardship will be felt through the Fairer Contributions Policy. The Fairer Contributions Policy aims to ensure fairness and transparency when assessing contributions. Everyone will have a guaranteed minimum income designed to ensure that no one will be asked to pay

more than they can afford.

Positive		Negative		Neutral impact	X	Unknown Impact	
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3. Age

As of 1 January 2017, the age range of the 1879 total service users, 1008 (54%) are aged 60+ and 871 (46%) are below the age of 60. The effects of reducing the DRE will be felt across the age range.

However, as expected the impact will fall mostly on the 60+ as they are predominant in the people being provided with a service and being charged. This is supported by the analysis of data set out in section 3, table 1.4.

The data also shows that of the 461 affected, 314 (68%) are over the age of 60+. This is expected as of the 1879 service users, 1008 are 60+.

There were issues identified in the consultation regarding vulnerable adults, which could include frail older people. We will undertake measures to ensure that no hardship will be felt through the Fairer Contributions Policy. The Fairer Contributions Policy aims to ensure fairness and transparency when assessing contributions. Everyone will have a guaranteed minimum income designed to ensure that no one will be asked to pay more than they can afford.

Positive		Negative	X	Neutral impact		Unknown Impact	
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4. Disability

Care and support is provided to vulnerable adults all of whom have a disability.

There were issues identified in the consultation regarding vulnerable and disabled adults. We will undertake measures to ensure that no hardship will be felt through the Fairer Contributions Policy. The Fairer Contributions Policy aims to ensure fairness and transparency when assessing contributions. Everyone will have a guaranteed minimum income designed to ensure that no one will be asked to pay more than they can afford.

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

The impact of this proposed change will impact across all ethnicity groups. However there is a greater impact for the Black / African / Caribbean / Black British and White groups. This is expected as these groups are predominant in the overall people being provided services and the overall population. Therefore these groups will slightly be disproportionately impacted by this decision.

This is supported with the data set out in section 3, table 1.6. This is expected given that of the 1879 service users, 881 (46%) are in the White ethnic group and 686 (37%) are in the Black/African/Caribbean/Black British in the ethnic group.

No issues relating to race or ethnicity were identified in the consultation

We will undertake measures to ensure that no hardship will be felt through the Fairer Contributions Policy. The Fairer Contributions Policy aims to ensure fairness and transparency when assessing contributions. Everyone will have a guaranteed minimum income designed to ensure that no one will be asked to pay more than they can afford.

Positive		Negative	X	Neutral impact		Unknown Impact	
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6. Sexual orientation

Data is not collected in relation to the charges for clients. We do not envisage a negative impact based upon this protected characteristic.

No issues directly relating to sexual orientation was outlined in the consultation.

We will undertake measures to ensure that no hardship will be felt through the Fairer Contributions Policy. The Fairer Contributions Policy aims to ensure fairness and transparency when assessing contributions. Everyone will have a guaranteed minimum income designed to ensure that no one will be asked to pay more than they can afford.

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

Data not collected in relation to charges. We do not envisage a negative impact based upon this protected characteristic.

No issues directly relating to religion and belief was outlined in the consultation.

We will undertake measures to ensure that no hardship will be felt through the Fairer Contributions Policy. The Fairer Contributions Policy aims to ensure fairness and transparency when assessing contributions. Everyone will have a guaranteed minimum income designed to ensure that no one will be asked to pay more than they can afford.

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

Data not collected in relation to charges. We do not envisage a negative impact based upon this protected characteristic.

No issues directly relating to pregnancy and maternity was outlined in the consultation.

We will undertake measures to ensure that no hardship will be felt through the Fairer Contributions Policy. The Fairer Contributions Policy aims to ensure fairness and transparency when assessing contributions. Everyone will have a guaranteed minimum income designed to ensure that no one will be asked to pay

more than they can afford.

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

Not available and we do not envisage a negative impact based upon this protected characteristic.

No issues directly relating to marriage or civil partnership status was outlined in the consultation.

We will undertake measures to ensure that no hardship will be felt through the Fairer Contributions Policy. The Fairer Contributions Policy aims to ensure fairness and transparency when assessing contributions. Everyone will have a guaranteed minimum income designed to ensure that no one will be asked to pay more than they can afford.

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

All DRE contributors have disabilities. It is likely that they are also likely to be older, women and from BAME backgrounds

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 protected characteristics?
- Will the proposal help to advance equality of opportunity between groups who share a protected characteristic and those who do not?
- Will the proposal help to foster good relations between groups who share a protected characteristic and those who do not?

The Care Act 2014 for assessing contributions sets the standard to ensure policies promote wellbeing and social inclusion. The proposal being considered is compliant with this framework.

Implementation of this proposal would affect current and future adult social care service users aged 18 and over who may be asked to contribute more towards their care and support across protected groups.

The policy will continue to provide an equitable process for financial assessments and contributions based on affordability and this will prevent the most vulnerable from experiencing the financial hardship.

Analysis of previous changes to the contributions policy indicates that the proposed changes would impact on the protected characteristics of disability. This is also supported by the analysis above. This is expected given that the profile of those most likely to receive care and support from the Council.

The proposal will result in individuals contributing more but no one will suffer severe financial hardship as a result of this decision because we are means testing individuals to ensure that they have the ability to pay through a financial assessment.

Also, the provision of comprehensive benefits advice to all service users at the time of a financial assessment can ensure that people using/needing support have access to adequate finance. This is of help to disabled people and their families as well as contributing to the local economy. The Council will continue to invest in this service to help people access all the benefits they are entitled to as part of the financial assessment.

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 EqIA guidance (part 11)

Outcome	Y/N
No major change: the EIA demonstrates the policy is robust and there is no potential for discrimination or adverse impact. All opportunities to promote equality have been taken.	Y
Adjust the policy: the EIA identifies potential problems or missed opportunities. Adjust the policy to remove barriers or better promote equality. Clearly <u>set out below</u> the key adjustments you plan to make to the policy.	N
Continue the policy: the EIA identifies the potential for adverse impact or missed opportunities to promote equality. Clearly <u>set out below</u> the justifications for continuing with it. For the most important relevant policies, compelling reasons will be needed.	N
Stop and remove the policy: the policy shows actual or potential unlawful discrimination. It must be stopped and removed or changed.	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

Impact	Action	Lead officer	Timescale
Potential financial hardship experienced by service users	We will monitor the changes in fees and charges in order to	Finance Assessment Team	Ongoing

as a result of the introduction and/or increase of fees and charges.	<p>identify and prevent individuals suffering financial hardship. This will be done:</p> <ol style="list-style-type: none"> 1. through financial assessments 2. Monitoring the number of requests for review of charges. 3. Where a service user chooses to end services because of the level of charges, they will be referred to social worker team for a review of their care needs. 4. Monitor the request for individual disability related expenditure. 	Manager	
6 c) Summarise the measures you intend to put in place to monitor the equalities impact of the proposal as it is implemented:			
This will be monitored through the number of appeals received for charge contributions and the number of individual requests for DRE assessments.			

7. Authorisation	
EIA approved by (Assistant Director/ Director)	Date

8. Publication

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

Appendix 1

Examples of Disability Related Expenditure includes:

1. Payment of any community alarm.
2. Costs of any privately arranged care services required, including respite care.
3. Costs of any speciality items or services intended to meet disability needs, for example:
 - (a) Day or night care which is not being arranged by the local authority;
 - (b) Specialist washing powders or laundry;
 - (c) Additional costs of special dietary needs due to illness or disability (permission to approach their GP in cases of doubt);
 - (d) Special clothing or footwear, for example, where this needs to be specially made; or additional wear and tear to clothing and footwear caused by disability;
 - (e) Additional costs of bedding, for example, because of incontinence;
 - (f) Any heating costs, or metered costs of water, above the average levels for the area and housing type, required by age, medical condition or disability;
 - (g) Reasonable costs of basic garden maintenance, if necessitated by a disability and not met by social services;
 - (h) Reasonable costs of cleaning or domestic help, if necessitated by a disability and not met by social services;
 - (i) purchase, maintenance, and repair of disability-related equipment, including equipment or transport needed to enter or remain in work; this may include IT costs where necessitated by a disability; reasonable hire costs of equipment may be included, if waiting for supply of equipment from Haringey Council;
 - (j) Personal assistance costs, including any household or other necessary costs;
 - (k) Other transport costs necessitated by illness or disability, including costs of transport to day centres, over and above the mobility component of DLA or PIP, if in payment and available for these costs but it will be reasonable not to take account of such costs for example where a suitable cheaper form of transport is available but is not being used.

