



# **Review of Adult Social Work & Social Care Contributions Policy**

## **Equalities & Human Rights Impact Assessment**

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## Introduction

Perth & Kinross Council is reviewing its Adult Social Work & Social Care Contributions Policy, which covers how and what we charge adults receiving care and support in their home, such as homecare, day services, short breaks, telecare and sheltered housing support.

This review is being undertaken as the current policy has been in place for 6 years and a proposed change in 2018 was suspended to allow a review of the wider policy to be undertaken. Also given the continuing financial constraints and the consequent need to minimise service cuts, there is an opportunity to generate additional income for the Health & Social Care Partnership, therefore protecting services and minimising cuts or savings in social care services.

The main objectives of the review were to ensure the policy:

- Remained fit for purpose
- Followed national guidance where applicable
- Was in line with CoSLA's move towards a standard financial assessment template across Scotland

All potential changes were assessed against the following criteria:

- Ensure fairness and complies with equalities legislation
- Follow national guidance
- Maximise income for the Council
- Reduce administration
- Simplicity for clients

It was agreed that the following changes be proposed to the current policy:

- Adopt the recommended Upper Capital Threshold for all clients
- Adopt the recommended Weekly Income Threshold for people below state pension age
- Remove the 2013/14 transitional protections
- Introduce flat-rating for low-level charges

In addition, a number of areas were identified as potential changes to the current policy, but these were discounted on the basis that following assessment, they did not meet the criteria of ensuring fairness, following guidance, maximising income, reducing administration or making charging clearer/simpler for clients to understand.

A comprehensive Equalities & Human Rights Impact Assessment (EHRIA) has been undertaken and the findings are detailed in this paper.

## Summary of Assessment

Below is a summary of the assessment for each proposed change. Further details are recorded

Proposed Change	Outcome of Assessment	Mitigation of Impact
Reduce Upper Capital Threshold from £28,000 to £16,000	<p>The assessment shows that people aged 40-70 with a learning disability will be worst affected by this proposal.</p> <p>The assessment also shows that a disproportionate number of males will be affected by this proposal.</p>	<p>Up-to-date financial assessments will be completed to ensure that people's capital is still above £16,000.</p> <p>Income maximisations will be offered in all cases.</p> <p>Drop-in sessions will be held throughout the Perth &amp; Kinross area.</p> <p>Correspondence will be sent to families/carers where appropriate.</p>
Adopt Two Age-Related Single Person Weekly Income Thresholds	<p>The assessment shows that this change would predominantly affect people aged under 65 with a learning disability.</p> <p>The assessment also shows that a disproportionate number of males will be affected by this proposal.</p>	<p>Up-to-date financial assessments will be completed to ensure that people's income has not changed from their previous financial assessment.</p> <p>Income maximisations will be offered in all cases.</p> <p>Drop-in sessions will be held throughout the Perth &amp; Kinross area.</p> <p>Correspondence will be sent to families/carers where appropriate.</p> <p>All clients will be advised of the process of, and supported to apply to, the Discretion Panel where they feel they will face undue financial hardship.</p>
Remove 2014 Transitional Protections	The assessment shows that no particular group of people will be disproportionately affected by this change.	No mitigations are required.
Remove Means-Testing from Low Level Charges	The assessment shows that no particular group of people will be disproportionately affected by this change.	No mitigations are required.

<p>Overall review of 4 proposals</p>	<p>The assessment shows that this change would predominantly affect people aged under 65 with a learning disability.</p> <p>The assessment also shows that a disproportionate number of males will be affected by this proposal.</p>	<p>Up-to-date financial assessments will be completed to ensure that people's income has not changed from their previous financial assessment.</p> <p>Income maximisations will be offered in all cases.</p> <p>Drop-in sessions will be held throughout the Perth &amp; Kinross area.</p> <p>Correspondence will be sent to families/carers where appropriate.</p> <p>All clients will be advised of the process of, and supported to apply to, the Discretion Panel where they feel they will face undue financial hardship.</p>
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## Characteristics Not Covered by Assessment

The following Equality Protected Characteristics are not covered in the attached summaries for the reasons detailed below:

Protected Characteristic	Reason for No Assessment
Age: Children (0-16)	The Adult Social Work & Social Care Contributions Policy does not cover services received by children.
Age: Looked after children (corporate parenting)	The Adult Social Work & Social Care Contributions Policy does not cover services received by children.
Gender Reassignment: Male transitioning to female or female transitioning to male	Whilst people transitioning may be affected by this change, it is not as a direct result of their gender reassignment. No information is held on gender reassignment.
Marriage/Civil Partnership: Same sex couples	Information on same sex couples is included within the mixed sex couple options of 'women' and 'men' in the summaries due to information not being stored in a way to allow this to be distinguished.
Pregnancy / Maternity / Paternity: Women	Whilst pregnant women/new mothers may be affected by these proposed changes, it is not as a direct result of their pregnancy or new birth. No information is held on pregnancy/new births.
Pregnancy / Maternity / Paternity: Men (paternity)	Whilst new fathers may be affected by these proposed changes, it is not as a direct result of their new birth. No information is held on new births.
Sexual Orientation Lesbian / Gay / Bisexual	Whilst lesbian, gay and bisexual clients may be affected by these changes, it is not as a direct result of their sexual orientation. No information is held on sexual orientation.
Sex Other Gender Identities	Whilst people who identify as genders other than male or female may be affected by these changes, it is not as a direct result of their gender. No information is held on other gender identities.

**NB:** where the assessment shows only 1 or 2 people against a specific characteristic, this has been recorded as "less than 3" in line with national guidance in order to ensure that individual people cannot be identified from the assessment.

An assessment of the impact on people by Council Electoral Ward has also been undertaken for the proposed changes and this does not show any proposal to have a disproportionate effect on any particular Ward within the Perth and Kinross area. Therefore, no mitigations are required in respect of rurality. However, in order to ensure that an individual cannot be identified from this assessment, and due to the small numbers affected by some of the proposed changes, it is not possible to detail the numbers affected by Ward.

## Summary of Current Client Base

In order to give context to the results found during this assessment, below is a summary of the 3,342 current clients.

### Males by Age & Disability

Disability Age	Physical Disability	Sensory Impairment	Mental Health	Learning Disability	No Disability Recorded	Total	%age of Client Base
16-24 years old	2	3	5	34	9	48	1.4%
25-39 years old	12	7	4	67	4	82	2.5%
40-49 years old	11	2	9	28	1	47	1.4%
50-59 years old	29	7	12	26	7	64	1.9%
60-64 years old	32	3	6	14	9	60	1.8%
65-69 years old	29	6	9	3	34	75	2.2%
70-79 years old	59	6	7	7	111	185	5.5%
80-89 years old	91	16	5	1	281	385	11.5%
90> years old	29	8	0	0	115	150	4.5%
<b>Total</b>	<b>294</b>	<b>58</b>	<b>57</b>	<b>180</b>	<b>571</b>	<b>1,096</b>	<b>32.8%</b>

*NB: the total against each age banding may not be a sum of the disability columns as people may have more than one disability type recorded on their record.*

### Females by Age & Disability

Disability Age	Physical Disability	Sensory Impairment	Mental Health	Learning Disability	No Disability Recorded	Total	%age of Client Base
16-24 years old	7	4	4	34	5	48	1.4%
25-39 years old	17	8	12	34	36	96	2.9%
40-49 years old	15	8	10	28	23	74	2.2%
50-59 years old	33	2	20	18	26	94	2.8%
60-64 years old	27	4	7	7	16	56	1.7%
65-69 years old	41	4	17	5	40	101	3.0%
70-79 years old	124	11	27	1	249	398	11.9%
80-89 years old	213	53	10	0	650	903	27.0%
90> years old	139	56	0	0	300	475	14.2%
<b>Total</b>	<b>616</b>	<b>150</b>	<b>107</b>	<b>127</b>	<b>1,345</b>	<b>2,245</b>	<b>67.2%</b>

*NB: the total against each age banding may not be a sum of the disability columns as people may have more than one disability type recorded on their record.*



## Total by Age & Disability

Disability Age	Physical Disability	Sensory Impairment	Mental Health	Learning Disability	No Disability Recorded	Total	%age of Client Base
16-24 years old	9	7	9	68	14	96	2.9%
25-39 years old	29	15	16	102	40	179	5.4%
40-49 years old	26	10	19	56	24	121	3.6%
50-59 years old	62	9	32	44	33	158	4.7%
60-64 years old	59	7	13	21	25	116	3.5%
65-69 years old	70	10	26	8	74	176	5.3%
70-79 years old	183	17	34	8	360	583	17.4%
80-89 years old	304	69	15	1	931	1,288	38.5%
90> years old	168	64	0	0	415	625	18.7%
<b>Total</b>	<b>910</b>	<b>208</b>	<b>164</b>	<b>308</b>	<b>1,916</b>	<b>3,342</b>	

**NB:** the total against each age banding may not be a sum of the disability columns as people may have more than one disability type recorded on their record.

Our current client base shows that around two thirds of people receiving chargeable care and support services are female. This is out of sync with our Equality Monitoring Data Guidance which shows that across the Perth and Kinross area, as well as Scotland overall, 49% of the population identify as male. However, the life expectancy in Scotland shows that females do live a significant amount of time longer than males and our assessment shows that is likely to be the main reason for the difference. Each age-banding before '70-79 years old' shows a much more even split, but from 70 years old onwards, there are much more females in receipt of chargeable services.

## Race

Race	Number of people	Percentage of client base
Arab	Less than 3	-
Asian/Asian Scottish/Asian British – Indian	3	0.1%
Asian/Asian Scottish/Asian British – Chinese	Less than 3	-
Asian/Asian Scottish/Asian British – Malaysian	Less than 3	-
Asian/Asian Scottish/Asian British – Pakistani	Less than 3	-
Black African	Less than 3	-
Black/Black Scottish/Black British - African	Less than 3	-
Canadian	Less than 3	-
Filipino	Less than 3	-
Gypsy Traveller	Less than 3	-
Mixed White & Asian	Less than 3	-
Mixed White & Black African	Less than 3	-
Mixed White & Black Caribbean	Less than 3	-
Not Known/Not Recorded	246	7.4%
Other Ethnic Background	Less than 3	-
Other Scottish	13	0.4%
Other Traveller	Less than 3	-
Polish	Less than 3	-
Welsh	Less than 3	-
White African	Less than 3	-
White American	5	0.1%
White Australian	Less than 3	-
White English	99	3.0%
White European	29	0.9%
White Irish	25	0.7%
White Other	79	2.4%
White Other British	448	13.4%
White Scottish	2,369	70.9%

Of the 3,096 people who have a race/ethnic origin recorded against their record, 3,058 (98.8%) classify themselves as 'white'. As a comparison this is in line with the 98% of people across the Perth and Kinross area or 96% across Scotland who consider themselves to be white.

## Religion

Religion	Number of people	Percentage of client base
Baptist	8	0.2%
Buddhist	Less than 3	-
Christian	32	1.0%
Church of England	25	0.7%
Church of Scotland	369	11.0%
Church of the Nazarene	Less than 3	-
Congregational Church	Less than 3	-
Episcopalian	8	0.2%
Free Presbyterian	Less than 3	-
Greek Orthodox	Less than 3	-
Not provided/recorded	2,590	77.5%
Jehovah's Witness	11	0.3%
Methodist	5	0.1%
Muslim	3	0.1%
No Religion	152	4.5%
Other Christian	Less than 3	-
Other Religion	Less than 3	-
Presbyterian	5	0.1%
Protestant	45	1.3%
Roman Catholic	75	2.2%
Salvation Army	Less than 3	-
Scottish Episcopal Church	3	0.1%
Seventh Day Adventist	Less than 3	-

Of the 752 people who have a religion recorded against their record, 600 (80%) consider themselves to have a religious belief with 152 having no religious belief. As a comparison this is considerably higher than the 52% of people across the Perth and Kinross area or 49% across Scotland who consider themselves to have a religious belief.

However, unfortunately, as 2,590 (77.5%) of clients do not have a religion recorded within their record, it is not possible to undertake a full meaningful assessment of religion within this assessment.

## Marriage/Civil Partnership

Sex	Number of people	Percentage of client base
Men	277	8.3%
Women	282	8.4%

Of the 3,342 people currently receiving chargeable care and support services, 559 (16.7%) are married or in a civil partnership. This is low in comparison to the 58% of people across the Perth and Kinross area or 47% across Scotland, who are married or in a civil partnership.

Whilst this is low in comparison to the overall population, it is in line with the view that more single people access care and support services on the basis that they do not have anyone available to care for them.

The proposed changes in this review do not adversely affect married people. It is planned that a revised Contributions Policy will continue to treat all clients as 'single people' for financial assessment purposes. This means that only the client's income/capital, along with 50% of any joint income/capital is included within a person's financial assessment. A partner's income and capital is completely disregarded from a financial assessment.

## Assessment of Proposal 1

<p><b>Proposed Change to Policy</b></p>	<p>Adopt the recommended 'Upper Capital Threshold' of £16,000 for all clients</p>
<p><b>What this Means</b></p>	<p>Currently Perth and Kinross Council do not consider an adult to be self-funding for care and support services unless they have accessible capital such as cash, bank/building society accounts, investments and shares, above £28,000. The value of a person's main home is not included. This is in line with national guidance for charging when someone enters a care home, ensuring equity wherever a person receives their care and support. However, national guidance on charging for services at home recommends that a person should be treated as self-funding when their capital reaches £16,000.</p> <p>It is proposed to reduce the upper capital threshold from £28,000 to £16,000 meaning that people will be treated as self-funding if they have capital above £16,000.</p> <p>The proposed change to £16,000 is in line with the capital threshold used by the Department of Work &amp; Pensions when considering a person's entitlement to means-tested benefits such as housing/Council Tax benefit, Universal Credit etc.</p>
<p><b>Summary of Changes</b></p>	<p>Of the 3,342 current clients, 72 people (2.2%) have capital between £16,000 and £28,000 and would therefore be deemed self-funding.</p> <p>Twenty-one people will be self-funding for a period of less than 52 weeks – an average of £272.36 per week for 16 weeks, compared to an average of £44.18 per week currently. Six of these people already pay the full cost of their care and support services based on their weekly income and will see no change in what they are asked to pay despite being deemed 'self-funding'.</p> <p>Fifty-one people will be self-funding for more than 52 weeks – an average of £8.22 per week for 19 years, compared to an average of £5.81 per week currently. Thirty-nine of these people already pay the full cost of their care and support services based on their weekly income and will see no change in what they are asked to pay despite being deemed 'self-funding'.</p> <p>Of the seventy-two people who will be deemed as self-funding, twenty-seven people will see an increase in what they are asked to pay, with twelve of these increases lasting for longer than 52 weeks.</p>

## People Deemed Self-Funding Following implementation

Where information is held for the 27 clients with a change in their contribution from implementation of the revised policy, below is a summary of the certain characteristics which will be affected by this change.

### Age & Disability

In order to ensure that an individual cannot be identified from this assessment, and due to the small numbers affected by this proposed change, it is not possible to detail the numbers affected as a cross-referenced table of age/disability. Therefore, separate tables are shown below for each characteristic

#### Age

Age	Total	Lowest Increase	Highest Increase	Average increase
16-24 years old	-	-	-	-
25-39 years old	Less than 3	£393.22	£393.22	<b>£393.22</b>
40-49 years old	Less than 3	£654.42	£654.42	<b>£654.42</b>
50-59 years old	Less than 3	£480.93	£480.93	<b>£480.93</b>
60-64 years old	7	£3.82	£732.22	<b>£284.63</b>
65-69 years old	4	£3.82	£647.74	<b>£267.48</b>
70-79 years old	4	£2.84	£16.25	<b>£6.68</b>
80-89 years old	3	£5.09	£17.37	<b>£14.15</b>
90> years old	6	£3.82	£177.56	<b>£41.56</b>

#### Disability

Disability	Total	Lowest Increase	Highest Increase	Average increase
Physical Disability	6	£2.84	£393.22	<b>£85.68</b>
Sensory Impairment	Less than 3	£3.82	£28.65	<b>£16.24</b>
Mental Health	Less than 3	£3.82	£3.82	<b>£3.82</b>
Learning Disability	9	£80.18	£732.22	<b>£460.15</b>
No Disability Recorded	8	£3.82	£177.56	<b>£30.34</b>

***NB:** the total against each age banding may not be a sum of the disability columns as people may have more than one disability type recorded on their record.*

The average increase upon implementation will be £181.83 per week. The assessment shows that people aged 25-70 and people with a learning disability are disproportionately affected by this proposed change.

This assessment has been based on information held on current clients' latest financial assessment. It may well be that their capital is now lower than the £16,000 threshold and all information will be updated, through individual meetings, prior any changes being approved to ensure that people are only treated as self-funding where their current capital is above £16,000.

The Assessment & Charging Team are holding drop-in sessions throughout the Perth & Kinross area, and will be meeting with local carer support groups to ensure that people have the opportunity to discuss concerns that they may have in relation to this proposal. Also, where information is held for a third party/carer/guardian, correspondence will be sent to them rather than the client.

### **Sex**

Fifteen of the twenty-seven clients identify as female and have an average increase on implementation of £149.29 per week.

Twelve of the twenty-seven clients identify as male and have an average increase on implementation of £222.50 per week

This split is in line with the overall split of people receiving chargeable care and support service. However, the assessment shows that males are substantially impacted upon more than females by the value of their increase. It is the view that although fewer males access care and support services, when they do, they require greater levels of support. Therefore, the imbalance of increase level does not appear to be disproportionate and as a result, no mitigations are necessary in this respect.

### **Race**

Twenty-six of the clients classify themselves as white and one person's ethnic origin is not known. This is in line with the overall split of ethnic origins of people receiving chargeable care and support services and therefore no mitigations are necessary in this respect.

### **Marriage/Civil Partnership**

None of the twenty-seven clients are married or in a civil partnership, however, as only 17% of our client base is married or in a civil partnership, this is not disproportionate and therefore no mitigations are necessary in this respect.

## People Deemed Self-Funding for More than 52 Weeks

Where information is held for the 12 clients with a change in their contribution for more than 52 weeks, below is a summary of the certain characteristics which will be affected by this change.

### Age & Disability

In order to ensure that an individual cannot be identified from this assessment, and due to the small numbers affected by this proposed change, it is not possible to detail the numbers affected as a cross-referenced table of age/disability. Therefore, separate tables are shown below for each characteristic

#### Age

Age	Total	Lowest Increase	Highest Increase	Average increase
16-24 years old	-	-	-	-
25-39 years old	-	-	-	-
40-49 years old	-	-	-	-
50-59 years old	-	-	-	-
60-64 years old	Less than 3	£3.82	£3.82	<b>£3.82</b>
65-69 years old	Less than 3	£3.82	£12.74	<b>£11.94</b>
70-79 years old	3	£2.84	£3.82	<b>£3.49</b>
80-89 years old	Less than 3	£5.09	£17.37	<b>£12.55</b>
90> years old	4	£3.82	£42.97	<b>£13.61</b>

#### Disability

Disability	Total	Lowest Increase	Highest Increase	Average increase
Physical Disability	4	£2.84	£17.37	<b>£8.79</b>
Sensory Impairment	Less than 3	£3.82	£5.09	<b>£3.82</b>
Mental Health	Less than 3	£3.82	£3.82	<b>£3.82</b>
Learning Disability	-	-	-	-
No Disability Recorded	6	£3.82	£42.97	<b>£12.48</b>

***NB:** the total against each age banding may not be a sum of the disability columns as people may have more than one disability type recorded on their record.*

The average increase for the twelve people who will be self-funding for longer than 52 weeks will be £9.81 per week. The above table shows that this will solely affect people aged 60 and over. However, as over 83% of people receiving chargeable care and support services are aged 60 and over, this is not seen as disproportionate and therefore no mitigations are required in this respect.

No single disability is disproportionately affected by this proposed change and therefore no mitigations are required in this respect.



## **Sex**

Eight of the twelve clients identify as female and have an average increase on implementation of £10.90 per week.

Four of the twelve clients identify as male and have an average increase on implementation of £7.64 per week.

This split is in line with the overall split of people receiving chargeable care and support services and as neither sex is disproportionately affected more than others, no mitigations are required in this respect.

## **Race**

All twelve clients classify themselves as white.

This is in line with the overall split of ethnic origins of people receiving chargeable care and support services within the Perth and Kinross area and suggests that no specific race is being disproportionately affected by this proposal. Therefore, no mitigations are necessary in this respect.

## **Marriage/Civil Partnership**

None of the twelve clients are married or in a civil partnership and therefore no mitigations are necessary in this respect.



## Assessment of Proposal 2

<b>Proposed Change to Policy</b>	Adopt recommended 'Weekly Income Threshold' for people below state pension age
<b>What this Means</b>	<p>Perth and Kinross Council currently use a single weekly income threshold of £210 per week for all clients when assessing how much someone can afford to pay towards their services. This amount is the amount of money disregarded from a person's weekly income to cover daily living costs such as utilities, food, social activities etc. Other allowances such as rent/mortgage, council tax and mobility benefits are disregarded in addition to this amount. However, national guidance suggests that there are four thresholds as follows:</p> <ul style="list-style-type: none"> <li>• Single person under pension age - £135</li> <li>• Single person of pension age - £210</li> <li>• Couple below pension age - £205</li> <li>• Couple of pension age - £320</li> </ul> <p>All recommended threshold figures are based on the Department of Work and Pensions (DWP)'s minimum income amounts in the United Kingdom welfare benefit system.</p> <p>It was previously agreed that in order to remain fair to people who are part of a couple, that Perth and Kinross Council would not adopt the recommended four thresholds. This ensures that a partner's income is not included in the financial assessment. When four income thresholds are used, there is not a standard approach to partner's income across Scotland, therefore clarity would be required on how Perth and Kinross Council wanted to treat this. It is presumed that this decision to treat all clients as single people still stands.</p> <p>It is recommended to adopt the two age-related single person thresholds, whereby all clients will continue to be treated as single people, only taking their income/capital and 50% of joint income/capital into account in the financial assessment. A partner's income/capital will continue to be fully disregarded in the financial assessment.</p>
<b>Summary of Assessment</b>	<p>Of the 3,342 current clients, 670 people (20.0%) are below state pension age.</p> <p>335 people (10.0%) will see an average increase in what they are asked to contribute towards the cost of their care and support package, of £59.34 per week.</p>

Where information is held for the 335 clients with a change in their contribution, below is a summary of the certain characteristics which will be affected by this change.

### Age & Disability

Age	Disability	Physical Disability	Sensory Impairment	Mental Health	Learning Disability	No Disability Recorded	Total	Lowest Increase	Highest Increase	Average increase
16-24 years old		4	7	5	62	5	<b>73</b>	£3.05	£81.00	<b>£60.62</b>
25-39 years old		18	11	4	96	4	<b>109</b>	£1.75	£81.00	<b>£63.35</b>
40-49 years old		6	7	8	49	Less than 3	<b>61</b>	£2.72	£81.00	<b>£62.65</b>
50-59 years old		17	6	12	38	6	<b>65</b>	£0.16	£81.00	<b>£54.65</b>
60-64 years old		8	3	3	15	Less than 3	<b>27</b>	£1.27	£81.00	<b>£43.50</b>
65-69 years old		-	-	-	-	-	-	-	-	-
70-79 years old		-	-	-	-	-	-	-	-	-
80-89 years old		-	-	-	-	-	-	-	-	-
90> years old		-	-	-	-	-	-	-	-	-
<b>Total</b>		<b>53</b>	<b>34</b>	<b>32</b>	<b>260</b>	<b>17</b>	<b>335</b>			
<b>Lowest Increase</b>		£1.27	£2.58	£2.72	£1.75	£0.16				
<b>Highest Increase</b>		£81.00	£81.00	£81.00	£81.00	£81.00				
<b>Average increase</b>		<b>£45.17</b>	<b>£57.20</b>	<b>£45.90</b>	<b>£64.76</b>	<b>£37.95</b>				

**NB:** the total against each age banding may not be a sum of the disability columns as people may have more than one disability type recorded on their record.

The above table shows that this proposed change predominantly affects people with a learning disability aged below 65. This is because the proposed reduction in the weekly income threshold is to bring our local policy for people below state pension age in line with the national guidance, whereas people who have reached their state pension are already given the recommended weekly income threshold as part of their financial assessment.

Within the Perth and Kinross area, 670 people below the age of 65 are in receipt of chargeable care and support services, of this, 291 have a learning disability. As people with a learning disability on average, have more expensive care packages than other people receiving services (£503 per week compared to £13 per week), it would be expected that their contribution would be higher, as there is more of a care cost to which they are financially assessed against.

As this implementation of this option was suspended in 2018, some people affected had discretions granted previously but these were not put in place due to the suspension. As part of this review, all previous applications for discretion will be reviewed to ensure they are still appropriate and be put in place where applicable. All clients will have the opportunity to apply for discretion and will be supported to do this where support is required.

## **Sex**

135 of the clients identify as female and would have an average increase on implementation of £56.47 per week.

199 of the clients identify as male and would have an average increase on implementation of £61.53 per week.

1 person does not have a specified sex and would have an increase of £9.95 per week.

The assessment shows that a disproportionate number of males will be adversely affected by implementation of this option. However, studies show that males more than females are affected by all the cognitive developmental disorders of childhood. Differences in the etiology of learning disabilities as well as general sex differences in learning styles in boys versus girls may explain the male preponderance in the prevalence of learning disabilities. The effects on learning of hormonal sex differences, maturation rate differences, and differences in frequency of perinatal brain injury will be discussed. Autism Spectrum Disorders also affect females less frequently than males, and several sex-differential genetic and hormonal factors may contribute. Therefore, the findings of this assessment do not appear to be disproportionate and therefore no mitigations are required in this respect.

## **Race**

324 (97%) of the clients with an increased contribution identify as 'white' and would have an average increase on implementation of £60.17 per week.

The ethnic origin of a further 2 people (0.6%) is not known and they would have an average increase on implementation of £33.63 per week.

The remaining 9 people, all with different ethnic origins, would have an average increase on implementation of £35.26 per week.

This is in line with the overall split of ethnic origins of people receiving chargeable care and support services within the Perth and Kinross area and suggests that no specific race is being disproportionately affected by this proposal. Therefore, no mitigations are necessary in this respect.

### **Marriage/Civil Partnership**

3 of the clients identify as female and are in a marriage or civil partnership and would have an average increase on implementation of £22.70 per week.

1 of the clients identify as male and are in a marriage or civil partnership and would have an average increase on implementation of £3.82 per week.

The assessment suggests that people in marriages or civil partnerships will not be disproportionately affected by implementation of this proposal, and therefore no mitigations are necessary in this respect.

## Assessment of Proposal 3

<b>Proposed Change to Policy</b>	Remove 2014 Transitional Protections
<b>What this Means</b>	<p>In recognition that some Older People would find that under the new policy in 2014, they were liable to contribute greater than the charge that they were previously paying, it was agreed that such people continued to pay a contribution based on their previous level of charge. This “transitional protection” was considered at each subsequent review of their care and support and where there was a change in the support offered; this resulted in the person losing this protection. The person is then asked to pay the amount assessed under the Contributions Policy.</p> <p>When the current Contributions Policy was implemented in February 2014, around 3,600 people in receipt of services at that point were given protection at the previous subsidised rates. It was anticipated that around 100 people per month would lose their protection, meaning that all protections would have been ceased by mid-2017. However, currently 421 people remain transitionally protected, the majority of whom only receive only telecare or occupational therapy services.</p> <p>It is proposed that these protections are now removed from all remaining clients ensuring a single charging regime is in place.</p>
<b>Summary of Assessment</b>	<p>Of the 3,342 current clients, 421 people (12.6%) remain transitionally protected and continue to pay the 2013/14 subsidised rates.</p> <p>If this proposal is implemented, 304 people (9.1%) will see an average increase in what they are asked to contribute, of £0.61 per week.</p>

Where information is held for the 304 clients with a change in their contribution, below is a summary of the certain characteristics which will be affected by this change.

### Age & Disability

In order to ensure that an individual cannot be identified from this assessment, and due to the small numbers affected by this proposed change in some age bandings or disabilities, it is not possible to detail the numbers affected as a cross-referenced table of age/disability. Therefore, separate tables are shown below for each characteristic

#### Age

Age	Total	Lowest Increase	Highest Increase	Average increase
16-24 years old	-	-	-	-
25-39 years old	Less than 3	£0.77	£0.77	<b>£0.77</b>
40-49 years old	7	£0.77	£1.78	<b>£1.20</b>
50-59 years old	15	- £1.12	£2.55	<b>£1.03</b>
60-64 years old	7	£0.77	£2.55	<b>£1.31</b>
65-69 years old	18	£0.77	£2.55	<b>£0.51</b>
70-79 years old	58	- £1.12	£2.55	<b>£0.50</b>
80-89 years old	112	- £1.12	£2.55	<b>£0.52</b>
90> years old	86	- £1.12	£2.55	<b>£0.64</b>

#### Disability

Disability	Total	Lowest Increase	Highest Increase	Average increase
Physical Disability	168	- £1.12	£2.55	<b>£0.68</b>
Sensory Impairment	23	- £1.12	£2.55	<b>£0.56</b>
Mental Health	8	- £1.12	£0.77	<b>£0.53</b>
Learning Disability	Less than 3	- £1.12	£0.77	<b>£0.18</b>
No Disability Recorded	119	- £1.12	£2.55	<b>£0.50</b>

***NB:** the total against each age banding may not be a sum of the disability columns as people may have more than one disability type recorded on their record.*

The above table shows that this proposed change predominantly affects people with a physical disability and people aged 65 or older. This is because prior to implementation of the current Contributions Policy, the only services that the Council charged for, and therefore protected from February 2014, were:

- Annual maintenance of occupational therapy equipment
- Community alarm/telecare services
- Homecare
- Older people day services
- Sheltered housing support

The nature of these services meant that they were predominantly accessed by older people with physical disabilities/frailties.



Whilst this proposed change does have an adverse effect on a particular group of people, this change is necessary in order to meet the Council's overall aim of the review, particularly in relation to fairness. This proposed change ensures that everyone accessing services would be financially assessed against the same cost rather than having a two-tier charging system based on when a person started receiving the service.

### **Sex**

234 of the 304 clients identify as female and have an average increase on implementation of £0.66 per week.

70 of the 304 clients identify as male and have an average increase on implementation of £0.44 per week.

This split is in line with the overall split of people receiving chargeable care and support services and as neither sex is disproportionately affected more than others, no mitigations are required in this respect.

### **Race**

271 (89%) of the clients with an increased contribution identify as 'white' with an average increase on implementation of £0.62.

The ethnic origin of a further 31 (10%) is not known and they would have an average increase on implementation of £0.47 per week.

The remaining two people would have an average increase on implementation of £0.77 per week.

This is in line with the overall split of ethnic origins of people receiving chargeable care and support services within the Perth and Kinross area and suggests that no specific race is being disproportionately affected by this proposal. Therefore, no mitigations are necessary in this respect.

### **Marriage/Civil Partnership**

12 of the clients identify as female and are in a marriage or civil partnership and would have an average increase on implementation of £0.99 per week.

12 of the clients identify as male and are in a marriage or civil partnership and would have an average increase on implementation of £0.95 per week.

The assessment suggests that people in marriages or civil partnerships will not be disproportionately affected by implementation of this proposal, and therefore no mitigations are necessary in this respect.



## Assessment of Proposal 4

<b>Proposed Change to Policy</b>	Remove Means-Testing from Low Level Charges
<b>What this Means</b>	<p>When someone receives an adult social work and social care service, they complete a financial assessment to work out how much they must pay towards this. However, the administration of mean-testing low level cost services, is considered extremely labour-intensive when most clients end up paying the full cost of their services, even after means-testing.</p> <p>It is considered that the following services are deemed to be low level:</p> <ul style="list-style-type: none"> <li>- Telecare</li> <li>- Amenity Housing</li> <li>- Retirement Housing</li> <li>- Annual Maintenance of Occupational Therapy Equipment</li> </ul> <p>Of the 2,049 people in receipt of the above services, only 254 (12.4%) currently receive the service free of charge of following a financial assessment.</p> <p>It is recommended, that in order to improve efficiency and reduce administration costs that, smaller charges for services are no longer means-tested and simplified. This means that everyone receiving these services will pay the same amount.</p> <p>The current maximum costs for these services are as follows:</p> <ul style="list-style-type: none"> <li>- Telecare - £3.82 per week</li> <li>- Amenity Housing - £3.82 per week</li> <li>- Retirement Housing - £7.72 per week</li> <li>- OT Maintenance - £6.14 per week</li> </ul> <p>It is anticipated that any future low-level costs will also be flat rated.</p>
<b>Summary of Assessment</b>	<p>Of the 3,342 current clients, 2,049 people (61.3%) are in receipt of low-level chargeable services.</p> <p>If this proposal is implemented, 283 people (13.8%) will see an average increase in what they are asked to contribute, of £3.98 per week.</p>

Where information is held for the 283 clients with a change in their contribution, below is a summary of the certain characteristics which will be affected by this change.

### Age & Disability

In order to ensure that an individual cannot be identified from this assessment, and due to the small numbers affected by this proposed change in some age bandings or disabilities, it is not possible to detail the numbers affected as a cross-referenced table of age/disability. Therefore, separate tables are shown below for each characteristic

#### Age

Age	Total	Lowest Increase	Highest Increase	Average increase
16-24 years old	11	£3.05	£3.82	<b>£3.54</b>
25-39 years old	33	£1.35	£6.87	<b>£3.77</b>
40-49 years old	25	£3.82	£6.87	<b>£4.19</b>
50-59 years old	39	£3.05	£3.82	<b>£3.76</b>
60-64 years old	17	£3.05	£3.82	<b>£3.74</b>
65-69 years old	29	£3.82	£7.72	<b>£4.09</b>
70-79 years old	51	£0.54	£7.72	<b>£4.10</b>
80-89 years old	59	£3.05	£7.72	<b>£4.25</b>
90> years old	19	£1.71	£3.82	<b>£3.71</b>

#### Disability

Disability	Total	Lowest Increase	Highest Increase	Average increase
Physical Disability	86	£0.54	£7.72	<b>£3.98</b>
Sensory Impairment	15	£3.05	£3.82	<b>£3.77</b>
Mental Health	18	£3.82	£3.82	<b>£3.82</b>
Learning Disability	53	£3.05	£6.87	<b>£3.82</b>
No Disability Recorded	133	£1.05	£7.72	<b>£4.04</b>

***NB:** the total against each age banding may not be a sum of the disability columns as people may have more than one disability type recorded on their record. It is anticipated that the greater number of people with 'no disability recorded' are those with elderly frailties which is in line with the higher number of people aged 65 and over in the age table.*

The above table shows that no particular age group or disability is disproportionately affected by this proposal. Therefore, no mitigations are required in this respect.

As well as information on, and support to apply to, Discretion Panel Information on housing options will be provided to people who feel that they cannot afford the increased cost in relation to this proposal. This will allow people to potentially seek alternatives to amenity/retirement housing or housing where OT equipment such as stairlifts is not required.

## **Sex**

201 of the clients identify as female and would have an average increase on implementation of £3.98 per week.

82 of the clients identify as male and would have an average increase on implementation of £4.00 per week.

This split is in line with the overall split of people receiving chargeable care and support services and as neither sex is disproportionately affected more than others, no mitigations are required in this respect.

## **Race**

259 (92%) of the clients with an increased contribution identify as 'white' and would have an average increase on implementation of £3.92 per week.

The ethnic origin of a further 22 (7.8%) is not known and would have an average increase on implementation of £4.81 per week.

The remaining two people would have an average increase on implementation of £3.44 per week.

This is in line with the overall split of ethnic origins of people receiving chargeable care and support services within the Perth and Kinross area and suggests that no specific race is being disproportionately affected by this proposal. Therefore, no mitigations are necessary in this respect.

## **Marriage/Civil Partnership**

10 of the clients identify as female and are in a marriage or civil partnership and would have an average increase on implementation of £4.21 per week.

8 of the clients identify as male and are in a marriage or civil partnership and would have an average increase on implementation of £3.32 per week.

The assessment suggests that people in marriages or civil partnerships will not be disproportionately affected by implementation of this proposal, and therefore no mitigations are necessary in this respect.



## Assessment of all Proposals

The average increase in contribution, if all four proposals are implemented, will be £24.47 per week.

Where information is held for the 871 clients with a change in their contribution, below is a summary of the certain characteristics which will be affected by this change.

### Age & Disability

Age	Disability	Physical Disability	Sensory Impairment	Mental Health	Learning Disability	No Disability Recorded	Total	Lowest increase	Highest increase	Average increase
16-24 years old		5	7	5	62	7	<b>76</b>	£3.05	£84.82	<b>£58.74</b>
25-39 years old		17	11	7	96	15	<b>128</b>	£0.77	£84.82	<b>£54.92</b>
40-49 years old		13	7	9	50	12	<b>80</b>	£0.77	£87.87	<b>£49.18</b>
50-59 years old		33	8	18	39	19	<b>99</b>	- £1.12	£84.82	<b>£37.52</b>
60-64 years old		23	3	6	16	5	<b>48</b>	£0.77	£84.82	<b>£26.07</b>
65-69 years old		27	5	6	Less than 3	12	<b>48</b>	£0.77	£11.62	<b>£3.24</b>
70-79 years old		52	4	5	4	50	<b>112</b>	- £1.12	£7.72	<b>£2.22</b>
80-89 years old		70	13	Less than 3	-	93	<b>172</b>	- £1.12	£16.25	<b>£1.97</b>
90> years old		48	10	-	-	55	<b>108</b>	- £1.12	£42.97	<b>£1.66</b>
<b>Total</b>		<b>288</b>	<b>68</b>	<b>57</b>	<b>269</b>	<b>268</b>	<b>871</b>			
<b>Lowest increase</b>		- £1.12	- £1.12	- £1.12	- £1.12	- £1.12				
<b>Highest increase</b>		£84.82	£84.82	£81.00	£87.87	£81.00				
<b>Average increase</b>		<b>£8.80</b>	<b>£29.75</b>	<b>£27.12</b>	<b>£63.34</b>	<b>£4.91</b>				

**NB:** the total against each age banding may not be a sum of the disability columns as people may have more than one disability type recorded on their record.

## Age

The assessment also shows that all age groups will be affected by the proposed changes in some capacity. However, those people aged below 65 will be disproportionately affected in terms of the average increase in their contribution – 93% above the average. This is predominantly due to proposal 2 in relation to the ‘weekly income threshold’.

## Disability

This assessment shows that all disabilities will be affected by the proposed changes in some capacity. However, those people with a learning disability will be disproportionately affected in terms of the average increase in their contribution – 159% above the average. This is predominantly due to proposal 2 in relation to the ‘weekly income threshold’.

As stated at proposal 2, studies show that males more than females are affected by all the cognitive developmental disorders of childhood. Differences in the etiology of learning disabilities as well as general sex differences in learning styles in boys versus girls may explain the male preponderance in the prevalence of learning disabilities. The effects on learning of hormonal sex differences, maturation rate differences, and differences in frequency of perinatal brain injury will be discussed. Autism Spectrum Disorders also affect females less frequently than males, and several sex-differential genetic and hormonal factors may contribute. Therefore, the findings of this assessment do not appear to be disproportionate and therefore no mitigations are required in this respect.

In line with the mitigations detailed under proposal 2, all previous applications for discretion will be reviewed to ensure they are still appropriate and be put in place where applicable. All clients will have the opportunity to apply for discretion and will be supported to do this where support is required.

## **Sex**

546 of the clients identify as female and would have an average increase on implementation of £15.88 per week.

324 of the clients identify as male and would have an average increase on implementation of £38.99 per week.

1 person does not have a specified sex and would have an increase of £9.95 per week.

This split is in line with the overall split of people receiving chargeable care and support service. However, the assessment shows that males are substantially impacted upon more than females in respect of the level of increase which would be applied if all four proposals were implemented.



As noted within proposal 1, it is the view that although fewer males access care and support services, when they do, they require greater levels of support. Therefore, the imbalance of increase level does not appear to be disproportionate and as a result, no mitigations are necessary in this respect.

### **Race**

804 (92.3%) of the clients with an increased contribution identify as 'white' and would have an average increase on implementation of £25.86 per week.

The ethnic origin of a further 55 (6.3%) is not known and would have an average increase on implementation of £3.55 per week.

The remaining 12 people, with 10 different ethnic originals, would have an average increase on implementation of £27.15 per week.

This is in line with the overall split of ethnic origins of people receiving chargeable care and support services within the Perth and Kinross area and suggests that no specific race is being disproportionately affected by this proposal. Therefore, no mitigations are necessary in this respect.

### **Marriage/Civil Partnership**

29 of the clients identify as female and are in a marriage or civil partnership and would have an average increase on implementation of £7.32 per week.

22 of the clients identify as male and are in a marriage or civil partnership and would have an average increase on implementation of £2.07 per week.

The assessment suggests that people in marriages or civil partnerships will not be disproportionately affected by implementation of the four proposals, and therefore no mitigations are necessary in this respect.

## Summary of changes to Client Contributions

The assessment has found that of the 3,342 current clients:

- 50 people will see a reduction in what they are asked to pay due to removal of 2014 transitional protections
- 2,471 will see no change to how much they are asked to pay
- 750 people will see an increase in what they are asked to pay because of one of the four proposals – average of £22.58 per week increase
- 71 people will see an increase in what they are asked to pay because of two of the four proposals – average of £62.46 per week increase

Below is a summary of the changes to weekly client contributions for each proposed change:

<b>Change in Contribution</b>	<b>Only Proposal 1 Implemented</b>	<b>Only Proposal 2 Implemented</b>	<b>Only Proposal 3 Implemented</b>	<b>Only Proposal 4 Implemented</b>	<b>If all 4 proposals implemented</b>
Reduction in contribution	-	-	53	-	50
No change in contribution	3,328	3,000	3,038	3,058	2,471
£0.01 to £10.00 increase	10	47	251	284	519
£10.01 to £20.00 increase	3	24	-	-	29
£20.01 to £30.00 increase	-	5	-	-	4
£30.01 to £40.00 increase	-	12	-	-	13
£40.01 to £50.00 increase	1	17	-	-	16
£50.01 to £60.00 increase	-	35	-	-	36
£60.01 to £70.00 increase	-	17	-	-	18
£70.01 to £80.00 increase	-	19	-	-	17
£80.01 to £90.00 increase	-	166	-	-	169
<b>Total</b>	<b>3,342</b>	<b>3,342</b>	<b>3,342</b>	<b>3,342</b>	<b>3,342</b>

## Above Average Increases

In order to identify if the highest increased contributions are attributed to a particular group of people, below is a summary of the 273 people with an increased contribution above the average of £24.47 per week.

### Age & Disability

In order to ensure that an individual cannot be identified from this assessment, and due to the small numbers affected by this proposed change, it is not possible to detail the numbers affected as a cross-referenced table of age/disability. Therefore, separate tables are shown below for each characteristic

#### Age

Age	Total	Lowest Increase	Highest Increase	Average increase
16-24 years old	56	£3.05	£84.82	<b>£75.64</b>
25-39 years old	98	£0.77	£84.82	<b>£70.01</b>
40-49 years old	52	£0.77	£87.87	<b>£73.35</b>
50-59 years old	49	- £1.12	£84.82	<b>£72.14</b>
60-64 years old	17	£0.77	£84.82	<b>£65.17</b>
65-69 years old	-	-	-	-
70-79 years old	-	-	-	-
80-89 years old	-	-	-	-
90> years old	Less than 3	£42.97	£42.97	<b>£42.97</b>

#### Disability

Disability	Total	Lowest Increase	Highest Increase	Average increase
Physical Disability	28	- £1.12	£84.82	<b>£71.09</b>
Sensory Impairment	28	- £1.12	£84.82	<b>£68.23</b>
Mental Health	21	- £1.12	£84.82	<b>£65.44</b>
Learning Disability	228	- £1.12	£84.82	<b>£72.98</b>
No Disability Recorded	11	- £1.12	£84.82	<b>£61.34</b>

***NB:** the total against each age banding may not be a sum of the disability columns as people may have more than one disability type recorded on their record.*

In line with the other sections of this assessment, the above table shows that people aged under 65 with a learning disability will be disproportionately affected by the proposed changes in this review and a number of mitigations as detailed throughout this assessment will be put in place to ensure that people are fully aware of the impact on them and the options available to them in relation to applying for a reduced/waived contribution.

## **Sex**

108 of the clients identify as female and would have an average increase on implementation of £70.15 per week.

165 of the clients identify as male and would have an average increase on implementation of £72.86 per week.

This split is out of sync with the overall split of people receiving chargeable care and support service and shows that a disproportionate number of males would have a higher than average increase in their contribution if all four proposals are implemented. However, as detailed in our sections of this assessment, it is the view that although fewer males access care and support services, when they do, they require greater levels of support. Therefore, the imbalance of increase level does not appear to be disproportionate and as a result, no mitigations are necessary in this respect.

## **Race**

268 (98.2%) of the clients with an increased contribution identify as 'white' and would have an average increase on implementation of £71.84 per week.

The ethnic origin of a further 1 person (0.4%) is not known and would have an increase on implementation of £67.10 per week.

The remaining 4 people, all with different ethnic originals, would have an average increase on implementation of £69.50 per week.

This is in line with the overall split of ethnic origins of people receiving chargeable care and support services within the Perth and Kinross area and suggests that no specific race is being disproportionately affected by this proposal. Therefore, no mitigations are necessary in this respect.

## **Marriage/Civil Partnership**

One female who is in a marriage or civil partnership would see an above average increase in their contribution if all 4 proposals were implemented. The increase would be £60.47 per week.

No males in a marriage or civil partnership would see an above average increase in their contribution if all 4 proposals were implemented.

The assessment therefore suggests that people in marriages or civil partnerships will not be disproportionately affected by implementation of the four proposals, and therefore no mitigations are necessary in this respect.

## Conclusion

This assessment shows that each of the proposed changes will, on average, have a negative financial effect on clients, due to increased contributions towards their care and support services. However, people under the age of 65 with a learning disability will be most adversely affected by this review of the Adult Social Work & Social Care Contributions Policy. This is, predominantly, as a result of proposal 2 affecting people below state pension age only.

Whilst this review does have an adverse effect on a particular group of people, these changes are necessary in order to meet the Council's overall aims of the review, as detailed in the introduction of this assessment.

The Health & Social Care Partnership currently provides around £23million of non-residential care and support services. This is split between chargeable and non-chargeable services. Following financial assessments, around £1.6million is recovered from client contributions towards these services. This income is vital to ensure that the Partnership can continue to provide the essential care and support services at a time when demand on services continues to increase and budget settlements are reducing.

In order to ensure that the Health & Social Care Partnership can minimise the impact on current service delivery, it is necessary to generate income from service users where a person is financially able to pay towards the services they receive.

The additional income of £1.2million per year which is anticipated from this review, will assist the Health & Social Care Partnership to minimise savings in other areas, such as service reductions/closures.

The only alternative option available to the Partnership is to reduce/close services and this would not achieve the strategic aim of sustaining vital services across the Perth and Kinross area.

In relation to proposal 2 specifically, national guidance recommends that Councils apply a 25% charging 'buffer' to the minimum income guarantee amounts (MIGA) set out by the UK Government/Department of Work & Pensions. This charging buffer is to ensure that not all of a person's income above their MIGA is considered as a contribution towards their care and support services. Perth & Kinross Council's current use of a single income threshold of £210 per week for all clients results in two different buffers being in place as follows:

	<b>UK Government MIGA</b>	<b>Current Income Threshold</b>	<b>PKC Charging Buffer</b>
Person below state pension age	£107.45 (including disability premium)	£210.00	95%
Person of state pension age	£167.25	£210.00	25%

Prior to 1 April 2019, Free Personal Care was only available across Scotland to people aged 65 or above and the increased buffer within the Perth & Kinross for people below state pension age, could be seen as a way of 'levelling the playing field' in respect of free personal care.

However, following the extension of Free Personal Care to under 65s from 1 April 2019, we believe that the same charging buffer, i.e. 25%, should now be applied to all financial assessments regardless of age.

The change in policy as proposed in proposal 2, allows Perth & Kinross Council to remove this inequality in the financial assessment process.

As per the current Contributions Policy, where any client feels that they will suffer undue financial hardship as a result of the proposed changes, they will be encouraged to apply to the Adult Social Work & Social Care Discretion Panel for a review of their individual circumstances in order to consider a discretionary reduced/waived contribution.

All clients affected by the change will also be offered a full financial income maximisation for them and the members of their household to ensure that they are getting all the benefits etc they are entitled to such as Personal Independence Payment, Pension Credit, Universal Credit, Council Tax Reductions etc.

The assessment shows that working age people with a learning disability are likely to be most impacted upon by these proposed changes and therefore several measures will be put in place by the Council to ensure that clients are fully aware of the changes and how they affect them. Below are examples of the measures that will be put in place:

- Engagement events with local carer/support groups
- Involvement of the Centre for Inclusive Living (CILPK) throughout the project
- Joint visits with Assessment & Charging staff and the client's support worker and/or social worker, where required
- Easy-read versions of all literature will be made available, wherever possible
- Details of role of discretionary panel will be provided to everyone affected, and assistance to apply will be provided where this is required

<b>Assessment Completed By</b>	Colin Barnett Senior Financial Assessment Officer
<b>Assessment Approved By</b>	Review of Contributions Policy Board
<b>Date</b>	26 February 2020