

APPENDIX 4

Stage 2 Full Equality Impact Assessment

Assessor(s)Name(s):	Garion Bird (Solicitor – Social care Team) / Hannah Donbavand (Financial Assessment & Charging Team Manager)
Directorate:	Adult Social Care
Date of Completion:	September 2021

Name of Policy/Strategy/Service/Function Proposal

The council is reviewing the Equality Impact Assessment in relation to its charging policy for Non-Residential care and support services

The Policy currently takes account of disability related benefit income received by people as follows:

- Attendance Allowance (AA) – the consideration is the council includes AA income at the higher rate (This has been included in the Financial Assessments since 2018);
- Disability Living Allowance (DLA) – the consideration is the council includes DLA benefit income at the higher rate (This has been included in the Financial Assessments since 2018);
- Personal Independence Payments (PIP) – the consideration is the council includes PIP income at the enhanced rate (This has been included in the Financial Assessments since 2018).

Higher rate disability benefits are paid to those individuals who are deemed (by the benefits agency) to have more care and support needs. This is because they require help with every day tasks such as washing, dressing and cooking.

According to the DLA website the rates are paid on the following basis;

Highest Rate – constantly need help day or night

Middle Rate – frequently need help day or night

Lowest Rate – need help only some of the day or with cooking meals

On 15 June 2017, Cabinet made the decision to seek a two-month consultation period to consider people's views on the proposed changes that took into account the higher rate disability benefits. The consultation was aimed at determining the opinion of those people who received non-residential care services including those individuals who would be directly affected by the proposals. An analysis of the consultation responses are contained within the EIA completed on 10 January 2018.

The local authority has identified that people with the protected characteristic of disability may be negatively affected by the ongoing implementation of the policy. All other protected characteristic groups are neutrally impacted.

The Aims, Objectives and Expected Outcomes:

The change to include higher rate benefits was initially adopted for two reasons:

Ensuring equality in how all disability related benefit income is treated in that people who receive these benefits at the higher or enhanced rate no longer have the difference between the lower and higher rates effectively ignored for purposes of means testing for adult social care. By way of contrast, those people who received the lower, middle or standard rates of these benefits had all of this income taken into consideration in the means test which equated to them having less disposable income in their financial assessments than someone receiving high rate benefits.

By including all of the disability related benefits in the financial assessment means that everyone is being charged fairly based on the income they receive in line with the Care Act 2014 Charging Regulations.

Secondly, it assisted Adult Social Care to contribute to the council's overall savings targets which were £7.5m in 2018/19 and £19m in total over the next three years (2018/19 to 2020/21)

On review, the council has identified the following reasons for continued implementation of the policy on review in 2021:

- To ensure individuals receiving non-residential care and support services are charged fairly and in accordance with the Care Act 2014
- The Isle of Wight Council provide care and support services for those individuals with eligible needs and their Care Act Assessment will determine how much care and support the individual needs.
- Each care act assessment is individual and the amount of care and support provided is not impacted by what level of disability benefits they receive
- The benefits paid to individuals are designed to assist with the additional costs of living with a disability. Individuals in receipt of the enhanced rates, by virtue of their more severe disabilities, are in receipt of higher levels of local authority services to meet their additional needs. The current implementation of the charging policy allows contributions to be charged to the extent that these additional needs are being met through services provided by the local authority.
- Whilst the Isle of Wight Council do take the higher rate of disability benefits into account in the financial assessment, a Disability Related Expenditure (DRE) assessment is offered to each individual receiving non residential services. This is to ensure that to the extent that the individual is using their benefits to meet disability related expenditure, this is properly excluded from the contribution calculation. This considers any disability related expenditure that the individual is having to fund as a direct result of their conditions and / or disabilities that are not covered in the Care Act Assessment and the care and support provided by the Isle of Wight Council.
- To charge for services in a manner which both raises sufficient income and fairly distributes the burden between recipients of those services and public funds more generally.
- Based on those individuals having their financial assessment reduced by £29.60 per week (the difference between middle and high rate benefits) this would reduce the income into the council by £16,450.20 per week or £855,410.92 per year.

It is important to note that these changes do not affect the level of care provided by the council but instead, change the amount that a person is required to contribute towards the cost of that care.

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

Income from charging is an important contribution to adult social care's budget. The council is facing a continued significant reduction of core central government funding in 2018/19, 2019/20 and 2020/21 alongside an increasing demographic demand for services that is reflected by more elderly people and increasing longevity of elderly and disabled people.

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

It must be noted that:

- The proposal is in line with the provisions of the Care Act 2014 and associated regulations as amended;
- The mobility component part of DLA and mobility part of PIP will not be included in a person's financial assessment;
- As per the Care Act 2014 Charging Regulations, the wages cannot be included in the financial assessment as an income type and therefore any monies earned through work must be disregarded in the financial assessment
- The council will continue to make sure that all eligible disability costs that a person may have (for example extra help for shopping, laundry, cleaning, prescriptions and higher fuel costs) are taken into account as part of how their charge is calculated. This is called Disability Related Expenditure;
- The council will also make sure that everyone has an allowance made in their financial assessment to meet the costs of their everyday living. The weekly allowance is set by the Dept of Health and covers food, heating and standard living costs;
- Services provided directly to carers will continue to be non-chargeable. It would only be the charge made for services to the cared for person which would be affected by these proposals.

The options set out arising from this policy review are as follows:

Option 1 – To continue the current implementation of the policy; continuing to include benefits at the higher or enhanced rate as a part of a person's means tested financial assessment.

Option 2 – Amend the policy to disregard the higher or enhanced benefit rates.

Option 3 – To amend the policy to continue to include higher or enhanced rates and adopt one of the other alternative methods set out in paragraph 8.43 of the Care and Support Statutory Guidance by charging a maximum percentage of disposable income, applying a maximum charge, or disregarding some other sources of income.

This impact assessment uses the monitoring information received as part of the consultation process undertaken between 16 August – 16 October 2017 and looks at the potential impacts of these

proposals on the protected characteristics of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation. It should be read in conjunction with the analysis of that consultation response which is set out in the previous Impact Assessment dated 10 January 2018.

Scope of the Equality Impact Assessment

The ongoing implementation of this policy affects only individuals with the protected characteristic of disability and more specifically those individuals in receipt of disability benefits outlined above. This Equality Impact Assessment is limited in scope to those individuals affected by the policy.

Analysis and assessment

Option 1 has now been in place since 2018 and therefore some individuals who are receiving care and support services from the Isle of Wight Council would not have been charged any other way. The current charging regulations allow for all local authorities to include the higher rate disability benefits in the financial assessment and by including the full amount in the financial assessment it promotes fairness across those receiving the various levels of disability benefits. To mitigate the fact the Isle of Wight Council are taking the full amount of disability benefits into account in the financial assessment, the Financial Assessment & Charging Team offer a DRE assessment to 'new' individuals receiving non-residential services. It is also offered to those 'current' individuals receiving care and support services in line with their annual financial assessment reviews.

Option 2 to disregard the higher / enhanced rate benefits in the financial assessment would require any individual receiving those high rate disability benefits to have a revised financial assessment. For those individuals who have a contribution to pay towards the cost of their care and support services this would reduce their financially assessed contribution. The report run in June 2021 identified that 728 individuals would be affected by this change. By disregarding the higher rate of disability benefits, those receiving higher benefits as a result of their disabilities and or conditions would have a higher disregarded income than those receiving the lower amount of disability benefits.

After undertaking a review of the charging policy, there are no further areas for the IWC to increase income based on discretionary charging regulations.

Option 3 would allow the council to look to charge no more than a set percentage of someone's income. The percentage figure set would determine the outcome of the individuals financial assessment. By completing financial assessments in this way, every individual receiving non-residential services would require a new financial assessment meaning it would affect over 1500 individuals. If these changes were to be considered, extensive work would need to be carried out on our financial assessment and charging tool to ensure we are able to complete financial assessments accurately and in accordance with the Charging Regulations.

By setting a maximum percentage fee, it would still mean that the amount retained by the individuals would vary meaning that someone receiving more income would have higher allowances made in their financial assessment over those with less income. Unless the percentage figure were set at 100%, this

would still result in individuals who have less income or those who are able to work being left with a greater proportion of disposable income than those unable to work, by virtue of the operation of the Charging Regulations. These changes would require considerable development work to the financial assessment tool on Paris; if they could be done at all.

After undertaking a review of the charging policy, there are no further areas for the IWC to increase income based on discretionary charging regulations.

With all options, just because someone is receiving higher rate disability benefits there is nothing to say that person is not also working and therefore receiving a wage which we are unable to take into account in the financial assessment due to the charging regulations.

Recommendations

Option 1 is the only means of achieving the stated aims of this policy. Neither of the identified alternatives offer a satisfactory means of achieving these aims. The impact assessment has concluded that any potential impact on individuals with protected characteristics can be justified or mitigated to the extent that the continued implementation of this policy is lawful and in compliance with the Local Authority's Public Sector Equalities Duty. Adoption of the policy as amended (Option 1) is recommended for this reason.

Option 2 is not recommended based on the reduced income into the council along with the staff time required to complete these changes. Additionally this would result in the disparity of income described above.

724 individuals receiving non-residential care and support would be affected

Option 3 is not recommended due to the variables involved and the fact that individuals would still be given differing amounts of disposable income based on their income and would be left with different proportions due to the mandatory disregards imposed by the regulations. i.e 20% of £500 (£100) would be a much higher allowance than 20% of £250 (£50)

1500+ individuals receiving non-residential care and support affected

Impact on income not yet determined as the Isle of Wight Council would need to determine what % income they wanted to leave the individual with.

Action/Improvement Plan

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

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

Area of impact	Is there evidence of negative positive or no impact?	Could this lead to adverse impact and if so why?	Can this adverse impact be justified on the grounds of promoting equality of opportunity for one group or any other reason?	Please detail what measures or changes you will put in place to remedy any identified impact (NB: please make sure that you include actions to improve all areas of impact whether negative, neutral or positive)
Age	No direct impact	NO The proposals would not have a specific impact on people because of their age. There is the potential that more people over the age of 65 will be impacted by these proposed changes as they are more likely to have a relevant disability and there is therefore the potential for indirect discrimination. However this protected characteristic will only be affected by this proposal if they have a disability with needs that could be seen as meeting the national eligibility criteria.		A person's eligibility for care services, and therefore the need to charge them for any services they are eligible to receive based on their ability to pay, cannot improve any impact on age equality.

Area of impact	Is there evidence of negative positive or no impact?	Could this lead to adverse impact and if so why?	Can this adverse impact be justified on the grounds of promoting equality of opportunity for one group or any other reason?	Please detail what measures or changes you will put in place to remedy any identified impact (NB: please make sure that you include actions to improve all areas of impact whether negative, neutral or positive)
		<p>People in this protected characteristic without disability needs that meet the national eligibility criteria will not be affected. The measures or changes set out under the heading of Disability should be referred to.</p>		
Disability	Negative	<p>YES Option 1 will result in a person who is in receipt of a higher or enhanced rate of disability benefit payment potentially continuing to have to pay more for their care services and this may have a negative effect on people with disabilities who live in the community.</p> <p>The comments received from the 2017 consultation highlighted five main areas of adverse impact about the proposed changes:</p> <ul style="list-style-type: none"> • Impact on how 	<p>Option 1 can be justified on the grounds of ensuring that all people with disabilities are treated more fairly by having the full amount of their disability benefit payment taken into account as part of their financial charging assessment. Currently, people who receive these benefits at the higher or enhanced rate do not have their full care related income taken into account whilst those people who are paid benefits at the lower, middle or standard rate are</p>	<p>If Option 1 is taken to change the council's non-residential care charging policy by including disability related benefit income at the higher or enhanced rate as part of its mean tested financial assessment process the negative impact on people with a disability will be mitigated wherever possible by ensuring that national guidance on how social care charges are assessed is followed and enough money is retained by each person to meet everyday living costs. Similarly, any additional disability related costs that a person in this protected characteristic has that meets the criteria used by the council and is in addition to any such expenses assessed previously, will mitigate some of the impact.</p> <p>In summary, the council will ensure the financial assessments of all the people negatively affected by this proposal are undertaken in line with Department of Health guidelines to make sure each person has sufficient money to meet their everyday needs. In addition, all current people affected by this proposal will be supported through the re-assessment process.</p>

Area of impact	Is there evidence of negative positive or no impact?	Could this lead to adverse impact and if so why?	Can this adverse impact be justified on the grounds of promoting equality of opportunity for one group or any other reason?	Please detail what measures or changes you will put in place to remedy any identified impact (NB: please make sure that you include actions to improve all areas of impact whether negative, neutral or positive)
		<p>the council allows disability related expenses</p> <ul style="list-style-type: none"> • Impact on a person's everyday living costs • Impact on the provision of night time care • Impact on the needs of an unpaid carer • Impact on a person's lifestyle 	<p>required to have all their benefit income included in their charging assessment.</p>	<p>By analysing the comments received as part of the consultation, the council recognises the impact the proposal would have as follows:</p> <p><u>Impact on how the council allows disability related expenses:</u></p> <p>If a person considers that the higher or enhanced disability related benefit income is currently being used to meet activities that are related to their disability and which the individual feels are important, the council has a duty to assess these activities against its eligibility criteria to consider how the charging assessment will be affected. It could be that the council may seek to support these services as part of its care assessment and meet them through their personal budget or a request can be made for these costs to be considered as a disability related expense (DRE) and an allowance may be made to reduce their charge.</p> <p>However, if, as part of the care assessment, these activities are considered to be more of a lifestyle choice than an eligible need, they will not be included as either part of a personal budget or a disability related expense.</p> <p>The Isle of Wight Council's assessment of DRE is reviewed annually to ensure that genuine expenses are included in the financial assessment. They are based on good practice guidelines developed by the National Association of Financial Assessment Officers (NAFAO). The DRE guidelines are set out in the Isle of</p>

Area of impact	Is there evidence of negative positive or no impact?	Could this lead to adverse impact and if so why?	Can this adverse impact be justified on the grounds of promoting equality of opportunity for one group or any other reason?	Please detail what measures or changes you will put in place to remedy any identified impact (NB: please make sure that you include actions to improve all areas of impact whether negative, neutral or positive)
				<p>Wight Council's charging policy for non-residential adult social care services (Appendix 1 pages 12 to 16) which can be accessed via the following link:</p> <p>https://www.iwight.com/documentlibrary/view/charging-policy-for-non-residential-asc-services</p> <p><u>Impact on a person's everyday living costs</u> The council recognises how people feel their everyday standard of living would be impacted by the proposal. It is important to note the council applies charging guidance in such a way to make sure people are able to meet their everyday living costs alongside their charging assessment.</p> <p>The need to charge for social care services, and then apply those charges based on a person's individual ability to pay, is determined by guidance issued by the Dept of Health.</p> <p>The guidance requires the council to make sure it allows an amount (Minimum Income Guarantee plus an additional allowance of 25%) that is considered by the Dept of Health to be appropriate to enable a person to meet their everyday living costs. This includes basic living expenses such as clothes, furniture, house repairs, utility costs, food, insurance and holidays that all people are required to pay. In addition, housing costs such as rent, mortgage and council tax are separately allowed as expenses in the charging assessment.</p>

Area of impact	Is there evidence of negative positive or no impact?	Could this lead to adverse impact and if so why?	Can this adverse impact be justified on the grounds of promoting equality of opportunity for one group or any other reason?	Please detail what measures or changes you will put in place to remedy any identified impact (NB: please make sure that you include actions to improve all areas of impact whether negative, neutral or positive)
				<p>If the council included disability related benefit income at the higher or enhanced amount as part of its charging assessment it would still have to ensure that the same Minimum Income Guarantee amount was available to everyone in order to meet their everyday living costs.</p> <p>A person is entitled to request a re-assessment of their needs at any time.</p> <p><u>Impact on the provision of night time care</u> The council is aware how people feel their night time care would be impacted by the proposal.</p> <p>The Care Act 2014 (Annex C: Treatment of Income) allows the council to include disability related benefits in its charging assessment and does not make any reference to night time needs.</p> <p>It is acknowledged that the higher rate of Attendance Allowance and Disability Living Allowance is paid when a person has to have help at night. In all cases, the council is responsible for assessing a person's night time needs and providing support if they are eligible and cannot be met in any other way. This would include a person's safety.</p> <p>Support that is available includes a mobile night personal care visit to assist toileting, pad changing or a welfare call. In addition, a full range of remote electronic monitoring (telecare) is available that can assist changes in behavioural patterns, detect</p>

Area of impact	Is there evidence of negative positive or no impact?	Could this lead to adverse impact and if so why?	Can this adverse impact be justified on the grounds of promoting equality of opportunity for one group or any other reason?	Please detail what measures or changes you will put in place to remedy any identified impact (NB: please make sure that you include actions to improve all areas of impact whether negative, neutral or positive)
				<p>movement and falls together with equipment such as bed turning support.</p> <p><u>Impact on the needs of an unpaid carer</u> The council appreciates the vital role that unpaid carers undertake. The proposal ensures that the cared for person has sufficient resources to pay for their own services based on their own ability to pay.</p> <p>An unpaid carer is entitled to an assessment of their own needs and this can be requested at any time. This can result in a re-assessment of the needs of the cared for person or an unpaid carer being eligible for support in their own right.</p> <p>People who live in their own home but only receive respite care services in residential care home are financially assessed under different guidance issued by Dept Health. This proposal would not change a person's charge if they only received respite care.</p> <p>It must be emphasised there would be no impact on the amount of care supported by the council given that a person's charge is mainly linked to their individual ability to pay. It is not the case that any increase in the amount a person is required to pay could be reduced by a person choosing to receive less care.</p> <p><u>Impact on a person's lifestyle</u> The council recognises the impact the proposal may have on a person's quality of life and lifestyle. If it is considered that the higher or enhanced disability related benefit income is currently being used to meet</p>

Area of impact	Is there evidence of negative positive or no impact?	Could this lead to adverse impact and if so why?	Can this adverse impact be justified on the grounds of promoting equality of opportunity for one group or any other reason?	Please detail what measures or changes you will put in place to remedy any identified impact (NB: please make sure that you include actions to improve all areas of impact whether negative, neutral or positive)
				<p>activities that are related to their disability, and which the individual feels are important, it could be that the council may seek to support these services as part of its care assessment or may make an allowance as part of a person's disability related expenses.</p> <p>However, if, as part of the care assessment, these activities are considered to be more of a lifestyle choice than an eligible need, they will not be included as either part of a personal budget or a disability related expense.</p> <p>It must be noted that disability related benefits are specifically paid to support a person's care needs and are not intended to be used to purchase items or activities that are not care related.</p> <p>The need to charge for social care services, and then apply those charges based on a person's individual ability to pay, is determined by guidance issued by the Dept of Health.</p> <p>The guidance requires the council to make sure it allows an amount (Minimum Income Guarantee) that is considered by the Dept of Health to be appropriate to enable a person to meet their everyday living costs. This includes basic living expenses such as clothes, furniture, house repairs, utility costs, food, insurance and holidays that all people are required to pay. In addition, housing costs such as rent, mortgage and council tax are separately allowed as expenses in the charging assessment.</p>

Area of impact	Is there evidence of negative positive or no impact?	Could this lead to adverse impact and if so why?	Can this adverse impact be justified on the grounds of promoting equality of opportunity for one group or any other reason?	Please detail what measures or changes you will put in place to remedy any identified impact (NB: please make sure that you include actions to improve all areas of impact whether negative, neutral or positive)
				If the proposal is agreed it is intended to make sure that people are given sufficient notice of any increase to their care charge to allow them sufficient time to make any necessary adjustments to their current arrangements.
Disability – higher rate individuals	Potential Negative	<p>There is a potential difference in treatment between disabled individuals in receipt of higher rates of benefits and those who are not.</p> <p>The identified adverse impact is that in many cases individuals who receive the higher rates of benefits are left with a lesser proportion of their income than those who are not in receipt, due to the operation of the <i>Care and Support (Charging and Assessment of Resources) Regulations 2014</i> ('The Charging Regulations').</p> <p>Since individuals in receipt of benefits who are able to work have the entirety of their earned income by operation of</p>	If the two groups of individuals in receipt of benefits are in an analogous position requiring any disproportionate impact to be justified, this impact can be justified on the basis that there are no other means of achieving the legitimate aim of affordability consistently with the Charging Regulations. Analysis of the various options are set out above.	As above.

Area of impact	Is there evidence of negative positive or no impact?	Could this lead to adverse impact and if so why?	Can this adverse impact be justified on the grounds of promoting equality of opportunity for one group or any other reason?	Please detail what measures or changes you will put in place to remedy any identified impact (NB: please make sure that you include actions to improve all areas of impact whether negative, neutral or positive)
		<p>r14 of the Charging Regulations disregarded, it has been suggested that there is a disproportionate impact on those individuals who are not able to work by virtue of their more severe disability (and consequence receipt of higher rates of benefits), as a greater proportion of the latter group's income is considered for charging purposes.</p> <p>The IOWC does not consider that these two groups are analogous positions for the purpose of determining any disproportionate impact requiring justification. These two groups are not comparable by virtue of their levels of disability but by virtue of their levels of earning. This relevant difference accounts for the different approach in assessing their finances for the purpose of charging. This</p>		

Area of impact	Is there evidence of negative positive or no impact?	Could this lead to adverse impact and if so why?	Can this adverse impact be justified on the grounds of promoting equality of opportunity for one group or any other reason?	Please detail what measures or changes you will put in place to remedy any identified impact (NB: please make sure that you include actions to improve all areas of impact whether negative, neutral or positive)
		policy does not (and is not capable of) amending the disregard of income, which is mandatory under the Charging Regulations.		
Gender Reassignment	No impact	NO The proposals would not have a specific impact on people because of gender reassignment. It is possible that people in this protected characteristic may be affected by this proposal but only if they have a disability with needs that could be seen as meeting the national eligibility criteria.		A person's eligibility for care services, and therefore the need to charge them for any services they are eligible to receive based on their ability to pay, cannot improve any impact on gender reassignment equality.
Marriage & Civil Partnership	No impact	NO The proposals would not have a specific impact on people because they are married, in a civil partnership or are unmarried. It is possible that people in this protected characteristic may be affected by this proposal but only if they have a disability with needs that could be seen		A person's eligibility for care services, and therefore the need to charge them for any services they are eligible to receive based on their ability to pay, cannot improve any impact on marriage or civil partnership equality.

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

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

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

Area of impact	Is there evidence of negative positive or no impact?	Could this lead to adverse impact and if so why?	Can this adverse impact be justified on the grounds of promoting equality of opportunity for one group or any other reason?	Please detail what measures or changes you will put in place to remedy any identified impact (NB: please make sure that you include actions to improve all areas of impact whether negative, neutral or positive)
		<p>affected by this proposal but only if they have a disability with needs that could be seen as meeting the national eligibility criteria. People in this protected characteristic without disability needs that meet the national eligibility criteria will not be affected.</p>		

Summary**Date of Assessment:**

September 2021

Signed off by Head of Service/Director

Laura Gaudion – Acting Director of Adult Social Care and Housing Needs

Review date

September 2022

Date published

September 2021