



## Telford & Wrekin Council’s Adult Social Care Residential and Non-Residential Charging Policies Review - Equalities Impact Assessment and Analysis (EIAA)

### Introduction

This EIAA discusses the proposals relating to the review of the Adult Social Care Charging Policies for residential and non-residential care for those individuals receiving care and support following consultation.

### Background

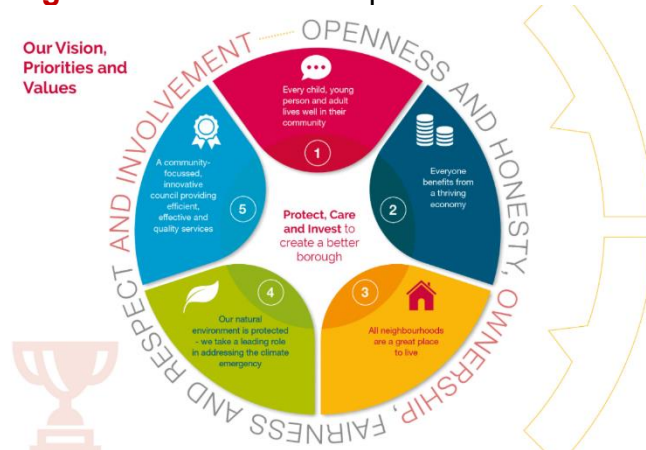
The Adult Social Care Charging Policies set out the principles and policies for applying charges for Telford & Wrekin Council’s Adult Social Care Services in accordance with the Care Act 2014 to ensure that the policies are fair and equitable to all users in receipt of care and support services.

The aim of the policies is to produce a consistent and fair framework for charging and financial assessments for all people that receive care and support services, following an assessment of the person’s needs and their individual financial circumstances.

These policies apply equally across all operational Adult Social Care service areas for those who have been assessed as eligible for care and support.

The policies are reviewed annually and were last updated April 2023.

The policies support the Council’s Plan and Vision ‘**To Protect, Care and Invest to create a better borough**’. The Council Plan priorities are summarised as follows:



The policies will affect employees, service users, members of the public and providers of chargeable adult social care services.

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## The Current Position

Our legal requirements to ensure that we continue to deliver services in line with the charging policies includes:

- Ensuring that people are not charged more than it is reasonably practicable for them to pay
- Being comprehensive, to reduce variation in the way people are assessed and charged
- Clear and transparent, so people know what they will be charged
- Applying charging rules equally so those with similar needs or services are treated the same
- Sustainable in the long term.

The current services that can be charged for to provide essential support to people in order to help them to maintain their independence and dignity include:

- Personal home care; this is provided for people in their own homes and includes supported living and extra care housing environments
- Residential care
- Day care
- Transport
- Housing adaptations not provided through the Disabled Facilities Grants
- The service elements of telecare equipment.

Some services are excluded from the charging process as there is no legal authority to charge, these include:

- Aftercare services provided under Section 117 of the Mental Health Act 1983
- Advice and Assessment
- Services provided to sufferers of Creutzfeldt Jacob Disease (CJD)
- Short term reablement services
- SEN education establishments (Residential colleges)

## Contributions and Financial Assessment

A person's financial assessment will be undertaken to determine the exact amount of contribution a person will be required to make towards any care costs. The Financial Declaration Form is used to undertake a financial assessment in order to work out how much the person will be required to contribute towards their care and support needs which they are entitled to. Currently, the assessment will make sure that the person retains a basic living cost allowance plus a buffer of 25%. This is a level of protected income that will not be considered in the financial assessment.

Living costs are calculated as follows:

- For those of working age, the standard personal allowance of Income Support plus the disability premium and where applicable the enhanced disability premium and the carers premium plus a 25% buffer
- For those over working age, the standard minimum guarantee of Pension Credit plus where applicable the carers additional amount plus a 25% buffer

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## Calculation of Income

The following is always disregarded in the financial assessment:

- Earnings
- Statutory sick pay, statutory adoptions and statutory maternity pay or allowance
- The mobility component of Disability Living Allowance and Personal Independent Payment
- The night-time element of care component of the Disability Living Allowance and Attendance Allowance unless night-time care is provided by Social Care
- War disablement pension and War Widows pension in line with local housing benefit scheme, however any constant Attendance Allowance paid will be included
- Savings Credit element of Pension Credit
- Working Tax Credit
- Winter fuel and cold weather payments
- Carers Allowance

This is not an exhaustive list, and individuals will be financially assessed on an individual basis with discretion applied where appropriate.

A review has been undertaken on the Residential and Non-Residential Adult Social Care Charging Policies and this has identified key areas for proposed change. These changes for consideration and consultation will affect people who use, or who are likely to use, adult social care. Principally, older people and people with disabilities including their partners and families.

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### Summary of Proposed Changes

	Area of Charging	Brief Description	Additional considerations if applicable
1	<p>Minimum Income Guarantee (MIG) (non – residential)</p> <p><b>Person Impact:</b> Total receiving non-residential care <b>1394</b> <b>481</b> no change <b>913</b> increased contribution</p>	<p>To change the calculation of the Minimum Income Guarantee (MIG) figure used in the non-residential financial assessment to the level permitted by the Department of Health &amp; Social Care (DHSC)</p> <p><b>TW Current</b> MIG = the basic level of Income Support <b>Plus</b> any <b>applicable</b> disability premiums as set by the Department of work and Pensions (DWP) each year <b>+ 25%</b> for 18+</p> <p><b>Proposed:</b> MIG = the Department of Health and Social care (DHSC) MIG published each year. Including using the under 25 MIG rates and only awarding disability premium where applicable</p>	<p>The Minimum Income Guarantee only applies to non-residential care services.</p> <p>Residential care services allow a Personal Allowance that is set by the DHSC each year.</p>
2	<p>Implement Tariff Income (non-residential)</p> <p><b>Person Impact:</b> Total receiving non-residential care <b>1394</b> <b>1247</b> no change <b>147</b> increased contribution</p>	<p>To introduce tariff income in the calculation of the financial assessment for non-residential care. (Tariff income is a weekly amount added to a person's income to take account of the notional income they receive from their capital).</p>	<p>Tariff income is already included in the TW residential financial assessments but is currently not included in non-residential financial assessments.</p>

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<b>3</b>	<p>High-rate Attendance Allowance &amp; Disability Living Allowance</p> <p><b>Person Impact:</b> Total receiving non-residential care <b>1394</b> <b>1147</b> no change <b>247</b> increased contribution</p>	To include as income the high rates of Attendance Allowance and Disability Living allowance in the financial assessment.	If night-time care is funded privately the difference between the lower/middle and higher rate may be disregarded in the financial assessment.
<b>4</b>	<p>Charging self-funders for brokering and administration of care</p> <p><b>Person Impact</b> <b>33</b> affected</p>	To introduce an ongoing annual administrative charge to self-funders for sourcing, arranging and the administration of care.	The number of self-funders requesting the Council to administer their care package is expected to increase significantly when the delayed Charging Care Reforms come into force in 2025 (currently we only have 33 self-funding clients this was expected to rise to approximately 350 when the Care Reforms were initially being implemented in Oct 2023).
<b>5</b>	<p>Telford &amp; Wrekin Appointee and Deputy Services</p> <p><b>1. Person Impact</b> <b>122</b> affected</p> <p><b>2. Person Impact</b> <b>172</b> affected</p>	<p>1. To introduce a weekly administrative charge for people in receipt of Appointee Services provided by the Council. To be increased annually in line with inflation.</p> <p>2. To pass on charges for bank and prepayment card charges for people in receipt of Deputy and Appointee Services provided by the Council.</p>	<p>Appointee Service: Costs associated may be disregarded in the financial assessment. This will mean that any care contribution may decrease by this amount dependent on individual financial circumstances. However, if contribution remains £0 or they are on a nil charge band this will still increase income to the Council through the administrative charge.</p> <p>We will consider disregarding the annual fees where a corporate body has been appointed. This will mean that any care contribution may decrease by this amount dependent on</p>

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	<p><b>3. Person Impact</b> 13 affected</p>	<p>3. To introduce an annual property management fee to people in rented accommodation who are in receipt of Deputy Services provided by the Council.</p>	<p>individual financial circumstances. However, if contribution remains £0 or they are on a nil charge band this will still increase income to the Council through the administrative charge</p> <p>We will consider disregarding the annual fees where a corporate body has been appointed. This will mean that any care contribution may decrease by this amount dependent on individual financial circumstances. However, if contribution remains £0 or they are on a nil charge band this will still increase income to the Council through the administrative charge</p>
6	<p>Community Alarms</p> <p><b>Person Impact</b> 500 affected</p>	<p>To introduce new eligibility criteria for Council funded Community Alarms and associated charging for the monitoring function of the Community Alarm service</p>	<p>Costs associated may be disregarded in the financial assessment. (as above)</p>
7	<p>Deferred Payment Agreement</p> <p><b>Person Impact</b> 12 affected</p>	<p>Increase Deferred Payment Agreement fees and introduce an annual administration charge.</p> <p>(A deferred payment agreement is a type of loan that homeowners can use to pay for their care home or nursing home. It is designed for people who cannot afford their weekly care costs because most of their money is tied up in the value of their home and they do not want to sell their home straight away)</p>	

The figures in the above table are based on those receiving care and support in April 2023.

## Adult Social Care Charging Review Equality Impact Analysis

### Research and Consultation conducted

Telford & Wrekin Council undertook a consultation exercise on the proposed changes to the Adult Social Care Charging Policies for residential and non-residential care.

The approach to the consultation was undertaken with due regard to the Public Sector Equality Duty, S149 Equality Act 2010.

The consultation was open for 11 weeks, from 20 June 2023 to 4 September 2023. It was targeted at those specifically affected by the changes but also engaged the wider community. This includes:

- People who are currently in receipt of chargeable care and support
- Unpaid carers
- Family members and those with caring responsibilities
- Co-production / Involvement Groups
- Organisations who support people with care and support needs

The consultation used a variety of methods to ensure people were able to have their say (and in accordance with the Public Sector Equality Duty and the Adult Social Care Accessible Information Standards). These included:

- Paper copy of survey and consultation document (with free return envelope)
- Accessible versions of paper copy of survey and consultation document (with free return envelope) - including easy read, large font and different languages
- Consultation document (available online and in paper form)
- Online survey
- Public bookable virtual sessions
- Public bookable face to face sessions in community settings including events targeted at specific groups of people within the Borough (e.g. deaf community session)
- Independent advocacy offer to support those most vulnerable to share their views
- Stakeholder meetings

A communication plan was in place and for each target audience the most appropriate and effective communication channels were used.

We gave contact details to individuals if they wanted to know what potential impact the proposed changes would have on their individual assessed contribution to care.

Please refer to the Consultation Pack available on [www.telford.gov.uk/ASCcharging](http://www.telford.gov.uk/ASCcharging) for further background information.

### Consultation Response

The consultation survey received a total of 397 responses, 359 received through the survey route, with an additional 38 through consultation sessions and relevant organisations.

Over 1,700 visits to the consultation webpage  
37 People attended the virtual and in person sessions  
38 people requested further financial details

Overall, half of the survey respondents (50.3%) indicated that they were users of adult social care services, around one quarter (26.3%) were other family members, 13.4% were unpaid carers and

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10.0% selected other (e.g. people working in supported living, and borough residents who were not users of services).

The consultation received responses from:

- 58.2% of respondents who completed the paper survey were aged 65 and over, whereas respondents to the online survey had a younger age profile, with 59.7% aged 25-64
- all the borough's 32 wards;
- all age groups (18 years +);
- 63.7% of respondents identified as female and 36.3% as male
- 4 in 5 respondents (80.4%) indicated that they had a long-standing illness, health problem or disability; and
- 91.1% of respondents were from a White British ethnic background and 8.9% from all other ethnic backgrounds. This is comparable to the profile of those in receipt of chargeable care and support of (92.9% White British and 7.1% all other ethnic backgrounds).

### Key issues raised

The findings of the consultation highlight that whilst a significant proportion of people agreed with the charging principles, a significant proportion reported that the changes would have a negative impact on them and their families.

- 48.3% of respondents agreed or strongly agreed with the charging principles
- 21.5% of respondents disagreed or strongly disagreed with the charging principles
- 30.3% of respondents neither agreed nor disagreed with the charging principles
  
- 14.2% of respondents felt changes would have a positive impact on them and their families
- 39.2% of respondents felt the changes would have neither a positive nor a negative impact on them or their families
- 46.6% of respondents felt the changes would have a negative impact on them and their families

The findings of the consultation highlight that whilst a significant proportion of people agreed with the charging principles, a significant proportion reported that the changes would have a negative impact on them and their families.

Within the consultation alternative options were suggested by responders. These were considered within the decision-making process.

### Evidence and Data

Population Profile (*Source: January 2023 from 2021 ONS population estimate*):

Population of T&W: 185,842  
Population aged 18+: 144,424  
Population aged 18-64: 111,451  
Population aged 65+: 32,973



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Data available on the electronic client record on Liquid Logic Adult Social Care record and the financial data is available via ContrOcc for those people currently receiving Care and Support.

Ethnicity	
White - British	1654
White - Irish	11
White - Any Other Background	23
Mixed - White/Black Carib	6
Mixed - White/Black African	*
Mixed - White/Asian	*
Any Other Mixed/Multi Background	7
Asian/British - Indian	16
Asian/British - Pakistani	21
Asian/British - Bangladeshi	*
Asian/Asian British - Chinese	*
Any Other Asian Background	11
Black/British - African	9
Black/British - Caribbean	16
Black/British - Any Other Black	*
Other Ethnic - Arab	*
Other Ethnic Group	*
No Data - Undeclared/Not Known	138

\*Numbers less than 4 have been suppressed

Gender	
Male	829
Female	1097
Age band	
18-64	805
65+	1121

## Adult Social Care Charging Review Equality Impact Analysis

### Identification and Analysis of Equality issues and impacts

Consider how people who share protected characteristics are affected by these proposed changes in relation to the General Equality Duty;

- *eliminate unlawful discrimination, harassment and victimisation*
- *advance equality of opportunity*
- *foster good relations between different groups*

Protected Characteristic	Impact (X limited, XX High impact)				Who is affected?	How are they affected?	Comment
	Positive	Negative	Neutral	No data			
Age		X			Over 18's	<p>Older people over the age of 65 will be slightly more impacted – this is because there are currently 805 18 to 64 year olds as opposed to 1121 65+ with care and support however this is likely to increase as demographic trends indicate that this age group will increase significantly.</p> <p>As a person gets older, they are more likely to develop a disability or long term condition, so more likely to be impacted by these policies. They are more likely to have higher living costs and disability related expenses than younger generations which will need to be fair. In addition, evidence shows that older people are proportionately more likely to have lower incomes, resulting in a greater impact due to a lower ability to pay increased charges.</p> <p>For younger generations who have an ongoing disability or long term condition,</p>	<p>Income from charges is essential to ensure future service delivery whilst managing rising costs fairly. The increase and/or introduction of some charges for some services previously not charged, will have a negative impact. Overall costs increase will be mitigated as much as possible but are balanced against the provision of reasonable and lawful services. Charges will only be levied against those the law says can afford to pay them, following individual financial assessment</p>

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						they will be impacted by the charging policies for a longer period of their lives	
<b>Disability</b>		X			More people with disabilities	<p>More people with disabilities are in receipt of care and support services than those without disabilities. The policies are likely to impact more on disabled people than non-disabled people.</p> <p>Given the nature of the service, the proposed changes will have a disproportionate impact on people with a disability. This impact will be largely financial in nature in that it will result in some service users having less disposable income.</p> <p>People with disabilities who receive care packages from the Council may find they are charged or charged more for the same service</p> <p>There is a risk of people ending or reducing support as a result of an increased charge, with subsequent risks to wellbeing and/or an increased burden placed on unpaid carers.</p> <p>The policies will include disability related expenditure (DRE) where allowances are intended to offset reasonable costs specifically arising from disability</p>	Charges will only be levied against those the law says can afford to pay them, following individual financial assessment.

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						People with a disability may be more likely to need clear information in an accessible format.	
<b>Gender</b>			X		Both but more women	<p>In seeking to deliver a consistent/ fair framework following an assessment approach applicable to all, the policies are gender neutral.</p> <p>Women are the largest part of the ageing population and therefore these policies are likely to impact more on women than men.</p>	<p>Charges will only be levied against those the law says can afford to pay them, following individual financial assessment. The aim of the policies is to produce a consistent and fair framework for charging and financial assessment for all service users.</p>
<b>Marriage or civil partnership</b>			X			<p>There is not enough information on the status of service users and carers in relation to marriage or civil partnerships to draw meaningful conclusions. However, it is not anticipated that the change will have a disproportionately negative or positive impact as it relates to this characteristic.</p>	<p>The Charging Policies position as they relate to couples (those married, in a civil partnership and living in the same household; or those living together as a couple in the same household) will not change because of these changes.</p>
<b>Pregnancy or maternity</b>			X			<p>It is not anticipated that the change will have a disproportionately negative or positive impact as it relates to this characteristic.</p>	

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<b>Race, nationality and ethnic origin</b>			X			Whilst the policies themselves are unlikely to impact on grounds of race, it is recognised that some nationalities may have difficulty understanding the policies due to limited English language skills.	Communication needs are noted by staff and copies of the policies can be made available in other languages on request.
<b>Religion or belief</b>			X			The policies will apply equally to all service users who receive support from the Council regardless of religious belief.	
<b>Sexual orientation</b>			X			The policies will apply equally to all service users who receive support from the Council regardless of sexual orientation.	
<b>Transgender status</b>			X			There is not enough information on the gender reassignment of adult social care users or carers to draw meaningful conclusions. However, it is not anticipated that the proposed changes will have a disproportionately negative or positive impact on people who have a gender that is different to the gender assigned to them at birth	
<b>Deprivation *</b>			X			Those in receipt of adult care and support may be amongst the most deprived. However, charges will only be levied against those who are deemed able to afford it, following individual financial assessment.  Levying charges against those who can afford it will increase the Council's cost	

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						recovery and contribute to the continued funding of adult care and support services.	
<b>Unpaid Carers</b>			X		Unpaid Carers	Unpaid carers are not charged for the support they are provided with, and it is proposed that this will continue.	
<b>People who have been under the care of local authority</b>			X			It is not anticipated that the proposed changes will have a disproportionately negative or positive impact as it relates to this characteristic.	
<b>Armed Forces and connected persons</b>			X			It is not anticipated that the proposed changes will have a disproportionately negative or positive impact as it relates to this characteristic.	

\*Deprivation is not a protected characteristic; however, it is an indicator of likely social inequality often related to a combination of different protected characteristics.

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## Analysis of Impacts

- Increased charges will have a negative impact on some service users, since they will need to pay more for the services.
- Gender, more service users are female, however, males would also be impacted by the increased costs.
- It is noted that there is clear evidence to show that disabled people, older people and people from minority ethnic backgrounds have proportionately lower levels of income and would therefore be impacted due to having a lower ability to pay for services. Charges will only be levied against those the law says can afford to pay them, following individual financial assessment.

## Risks & Mitigation

The proposals do impact vulnerable individuals however, service users are means tested and only those considered to have the financial means will be expected to pay the increased charge.

Whilst no person will be required to pay more than they can afford towards the cost of their care under the new Charging Policies the changes will result in an increase in charges for some individuals. The impact may be lessened if a series of mitigations are put in place alongside the established financial assessment process. It is therefore appropriate to plan for several mitigations which will enable individuals to transition smoothly onto the new charges.

Subject	Mitigation
<p><b>Age:</b> More older people are in receipt of care and support services than younger people. The policies have the potential to impact more on older people than younger people.</p>	<p>People affected by the proposed charges are likely to be predominately older people.</p> <p>If there are increases in a person's contribution to their care package there are concerns that this could result in them choosing to cancel services. In mitigation as we currently do, Social Workers will undertake a risk assessment if a person decides to cancel services that they have been assessed as needing. This will ensure that there are safeguards in place if a person stops accessing services.</p> <p>Cases of individual hardship can be considered on a case-by-case basis. We may be able to amend your contribution for a period of time.</p> <p>Charges will only be levied against those the law says can afford to pay them, following</p>

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	individual financial assessment in line with the Council's policy.
<b>Disability:</b> more people with disabilities are in receipt of care and support services than those without disabilities. The policies have the potential to impact more on disabled people than non-disabled people	<p>The policies will be made available in alternative formats when requested.</p> <p>Reasonable disability related expenses (DRE's) will be disregarded in the financial assessment to ensure the MIG does not cover DRE's.</p> <p>Charges will only be levied against those the law says can afford to pay them, following financial assessment in line with the Council's policy</p>
<b>Gender:</b> Women form the largest part of the ageing population and therefore the policies have the potential to impact more on women. Although the policies will apply equally to all service users who receive support from the Council regardless of gender	<p>Reasonable disability related expenses (DRE's) will be disregarded in the financial assessment to ensure the MIG will not be required to cover DRE's</p> <p>Charges will only be levied against those the law says can afford to pay them, following financial assessment in line with the Council's policy.</p>
<b>Marriage or civil partnership:</b> The policies will apply equally to all service users who receive support from the Council regardless of marital or civil partnership status	<p>Reasonable disability related expenses (DRE's) will be disregarded in the financial assessment to ensure the MIG will not be required to cover DRE's</p> <p>Charges will only be levied against those the law says can afford to pay them, following financial assessment in line with the Council's policy.</p>
<b>Pregnancy or Maternity:</b> The policies will apply equally to all service users who receive support from the Council regardless of pregnancy or maternity	<p>Reasonable disability related expenses (DRE's) will be disregarded in the financial assessment to ensure the MIG will not be required to cover DRE's.</p> <p>Charges will only be levied against those the law says can afford to pay them, following financial assessment in line with the Council's policy.</p>
<b>Deprivation:</b> Those in receipt of adult care and support services are likely to be amongst the most deprived.	Reasonable disability related expenses (DRE's) will be disregarded in the financial assessment to ensure the MIG will not be required to cover DRE's



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	Charges will only be levied against those the law says can afford to pay them, following financial assessment in line with the Council's policy.
<b>Race, nationality and ethnic origin:</b> some nationalities may have difficulties understanding the policies due to limited English language skills.	To ensure that the policies are available in alternative languages when requested.
<b>Religion or belief:</b> The policies will apply equally to all service users who receive support from the Council regardless of religion or belief	Charges will only be levied against those the law says can afford to pay them, following financial assessment in line with the Council's policy.
<b>Sexual orientation:</b> The policies will apply equally to all service users who receive support from the Council regardless of sexual orientation	Charges will only be levied against those the law says can afford to pay them, following financial assessment in line with the Council's policy.
<b>Transgender Status:</b> The policies will apply equally to all service users who receive support from the Council regardless of transgender status	Charges will only be levied against those the law says can afford to pay them, following financial assessment in line with the Council's policy.
<b>Unpaid Carers:</b> Unpaid carers are not charged for the support they are provided with, and it is proposed that this will continue.	The Council will undertake further promotion of the support available to carers across Telford and Wrekin including (but not limited to): <ul style="list-style-type: none"> <li>• Carers Network</li> <li>• Carers Centre</li> <li>• Carers Hubs</li> <li>• Carers Assessments</li> <li>• <a href="#">Carers Wellbeing Guide</a> (the one-stop guide to the latest information, advice, guidance and contacts to support carers)</li> </ul>
<b>People who have been under the care of local authority:</b> It is not anticipated that the proposed changes will have a disproportionately negative or positive impact as it relates to this characteristic.	Charges will only be levied against those the law says can afford to pay them, following financial assessment in line with the Council's policy.
<b>Armed Forces and connected persons:</b> It is not anticipated that	Charges will only be levied against those the law says can afford to pay them, following

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the proposed changes will have a disproportionately negative or positive impact as it relates to this characteristic.	financial assessment in line with the Council's policy.
<b>General:</b> data collection could be improved to support better identification of the impact of adult social care support on individuals with protected characteristics	Some data is already collected. This requires review to identify gaps and make recommendations for addressing the gaps.

### Action to be taken

The following action plan is based upon the analysis of data and consultation outcomes and will support individuals to transition onto the new charges, the following actions have been agreed:

Areas of concern identified throughout the review and consultation	Actions
Increasing charges and the perception of unaffordability may incentivise some people to seek to reduce the services they are receiving, and this may lead to unreported or unmet needs.	<p>The Council will monitor carefully the people impacted by the recommended changes to identify any trends in the reduction of service use and potential for any safeguarding issues.</p> <p>As is normal practice, where there are risks or concerns over the welfare of a person, a review assessment and if appropriate, safeguarding procedures are followed to ensure that the person is not at risk.</p>
Regarding implementation of any changes, there is a risk that the person will not be able to fully understand the changes that are being made or the impact that they will have.	<p>The consultation was conducted having had due regard to the Public Sector Equality Duty set out in S149 Equality Act 2010 and the Adult Social Care Accessible Information Standards. Please refer to the consultation summary document for further details on the mitigating action undertaken during the consultation period.</p> <p>During the implementation phase, prior to 1 January 2024 (when the new policy will take effect,) individual letters will be sent to everyone who will be affected by the changes. Within the letter will be the information about the charges, what that means financially, support available and when they will be impacted by the changes. (This will also include links to the Council's financial support and advice for working age residents and pensioners.) Where appropriate, the Financial Case Management Team will follow up the letters with the individual, or their nominated representative. Alongside this, stakeholders, including the voluntary, community and social enterprise sector, will be</p>

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	<p>contacted to inform them of the decision, alongside what support is available for people.</p> <p>All communications to the individual will be in the method they have chosen as their preferred communication method (e.g. large print, easy read, alternative languages and formats...etc).</p> <p>The Financial Case Management Team will continue to provide support to individuals in relation to their financial assessments and their understanding of them.</p> <p>The application of Disability Related Expenditure (DREs) will be reviewed to ensure consistency as part of the individual Care Act Assessment and subsequent Financial Assessment. The outcome of this review will also include improved DRE information and advice available.</p> <p>An advocacy offer is already in place to support people where needed. This will continue to be promoted.</p>
<p>Short-term financial disruption to people impacted by the changes</p>	<p>The implementation date is 1 January 2024 but in respect of the MIG level, this will amount to a staged implementation with the full policy coming into effect on 1 January 2025, as set out below.</p> <p>As part of the implementation plan a notice period is included to give individuals further time to plan for the changes and to engage with any additional support that they may require.</p> <p>Whilst the changes will take effect from 1 January 2024, people who are affected will not receive their first invoices until end of January 2024.</p> <p>During the implementation phase, prior to 1 January 2024 (when the new policy will take effect,) individual letters will be sent to everyone who will be affected by the changes. Within the letter will be the information about the charges, what that means financially, support available and when they will be impacted by the changes. (This will also include links to the Council's financial support and advice for working age residents and pensioners.)</p> <p>The Financial Case Management Team will continue to provide support to individuals in relation to their financial assessments and their understanding of them.</p> <p>To reduce the immediate impact on people it is proposed that the Council will be introducing the changes to Minimum</p>

## Adult Social Care Charging Review Equality Impact Analysis

	<p>Income Guarantee (MIG) in a phased approach; the change to the MIG amount will be reduced by 75% of the difference between the current MIG level and level permitted by the DHSC (the original proposal). From 1 January 2025 the MIG will be reduced to the level permitted by the DHSC.</p>
<p>Financial hardship to the person</p>	<p>Where there are concerns over the welfare of a person, a review assessment and if appropriate, safeguarding procedures will be followed (this is already current practice).</p> <p>Payment plans may also be considered following agreement with individuals</p> <p>As is normal practice, for people facing exceptional circumstances or severe financial hardship the policies continue to sanction the responsible Director for Adult Social Care to approve a full or partial waiver of charges. Each individual person will have an individual financial assessment to determine their ability to contribute towards the cost of their care.</p>
<p>Negative impact on unpaid and family carers</p>	<p>The Council remains committed to not charging for carer's services.</p> <p>The Council will undertake further promotion of the support available to carers across Telford and Wrekin including (but not limited to):</p> <ul style="list-style-type: none"> <li>• Carers Network</li> <li>• Carers Centre</li> <li>• Carers Hubs</li> <li>• Carers Assessments</li> <li>• <a href="#">Carers Wellbeing Guide</a> (the one-stop guide to the latest information, advice, guidance and contacts to support carers)</li> </ul>
<p>Increased debt from unpaid care contributions</p>	<p>Benefit Maximisation - the Financial Case Management team, when completing a financial assessment, will continue to identify any missing benefit entitlements and offer support and guidance to the individual to apply. They will also signpost to voluntary organisations who are able to assist people in applying for their benefits.</p> <p>Implementation of online financial assessment has started to enable financial assessments to be completed more rapidly.</p> <p>The Independent Living Centre will also be offering booked appointments to support people with the completion of the online financial assessment where needed.</p>

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	<p>Adult Social Care will promote the uptake of Direct Debit method of payment.</p> <p>An integrated debt referral process between the Council's Financial Case Management, Invoicing and Collection and Legal teams to ensure timely recovery of unpaid contributions has been established.</p> <p>Adult Social Care will continue to promote people updating their financial assessments regularly. This will help ensure that the financial assessment calculations are undertaken on the person's current situation.</p> <p>Working closely with Town and Parish Councils and external social care organisations to help signpost clients that may need additional support</p> <p>Training will be made available for all Councillors, which includes points of contact to help direct members of the public to access support</p>
Some data is already collected. This requires review to identify gaps and make recommendations for addressing the gaps.	Data collection could be improved to support better identification of the impact of adult social care support on individuals with protected characteristics

The original Equalities Impact Analysis was completed by

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The impact analysis was agreed by

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Date of agreement	26.10.2023