

GENERIC EQUALITY IMPACT ASSESSMENT FORM

Stage 1 – screening to establish if the function has any relevance to any equality issue and/or monitored group

i.e.

- Could the function affect one or more equality group in a different way to another group?
- Establish whether different equality groups have different needs
- Establish whether the function contributes to or hinders equality of opportunity

1a	<p>Please give a brief description of the function and its purpose*</p> <ul style="list-style-type: none"> • Align the standard rates of Disability Related Expenses (DRE) allowance with the new Personal Independence Payment (PIP). • Align the contributions policy with the Care Act 2014 by:- <ul style="list-style-type: none"> ○ Introducing an administration charge for full cost clients ○ Introducing a deferred payments policy ○ Introducing a charge for carers services <p>*Function can mean process, service, policy or project</p>		
1b	<p>How would you classify the function type?</p> <p><input checked="" type="checkbox"/> The service is provided on the basis of an application and /or targeted then go to question 1c</p> <p><input type="checkbox"/> The service is open to all go to question 1d</p>		
1c	<p>Is the function accessible for all groups? Either tick the box 'Accessible to all groups' and provide <u>relevant evidence</u> OR tick the box for each group to whom the function is <u>not accessible</u> or for whom there may be needs or considerations to accommodate.</p> <table border="0" style="width: 100%;"> <tr> <td style="width: 50%; vertical-align: top;"> <input checked="" type="checkbox"/> *Accessible for all groups <input type="checkbox"/> Age <input type="checkbox"/> Disability <input type="checkbox"/> Gender <input type="checkbox"/> Marriage & civil partnership </td> <td style="width: 50%; vertical-align: top;"> <input type="checkbox"/> Pregnancy & maternity <input type="checkbox"/> Race <input type="checkbox"/> Religion & belief <input type="checkbox"/> Transgender or Transsexual </td> </tr> </table>	<input checked="" type="checkbox"/> *Accessible for all groups <input type="checkbox"/> Age <input type="checkbox"/> Disability <input type="checkbox"/> Gender <input type="checkbox"/> Marriage & civil partnership	<input type="checkbox"/> Pregnancy & maternity <input type="checkbox"/> Race <input type="checkbox"/> Religion & belief <input type="checkbox"/> Transgender or Transsexual
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1d	<p>Is it likely that there will be a negative impact on one or more of the equality groups, or is it clear at this stage that it will be equality neutral? (No negative impact on the groups) Please tick in the box equality neutral OR tick the box for the group(s) that will suffer a negative impact. If you have ticked the box 'equality neutral' please provide evidence.</p>		
<table style="width: 100%; border: none;"> <tr> <td style="width: 50%; padding: 5px; vertical-align: top;"> <input type="checkbox"/> Equality neutral <input type="checkbox"/> Age <input checked="" type="checkbox"/> Disability <input type="checkbox"/> Gender <input type="checkbox"/> Marriage & civil partnership </td> <td style="width: 50%; padding: 5px; vertical-align: top;"> <input type="checkbox"/> Pregnancy & maternity <input type="checkbox"/> Race <input type="checkbox"/> Religion & belief <input type="checkbox"/> Transgender or Transsexual </td> </tr> </table>	<input type="checkbox"/> Equality neutral <input type="checkbox"/> Age <input checked="" type="checkbox"/> Disability <input type="checkbox"/> Gender <input type="checkbox"/> Marriage & civil partnership	<input type="checkbox"/> Pregnancy & maternity <input type="checkbox"/> Race <input type="checkbox"/> Religion & belief <input type="checkbox"/> Transgender or Transsexual	<p>If you consider that the impact is Equality Neutral then go to question 1h Otherwise go to question 1e</p>
<input type="checkbox"/> Equality neutral <input type="checkbox"/> Age <input checked="" type="checkbox"/> Disability <input type="checkbox"/> Gender <input type="checkbox"/> Marriage & civil partnership	<input type="checkbox"/> Pregnancy & maternity <input type="checkbox"/> Race <input type="checkbox"/> Religion & belief <input type="checkbox"/> Transgender or Transsexual		
1e	<p>What are the negative impacts associated with this function? Please list and give details then go to question 1f</p> <p>Streamlining the standard DRE allowance will have an impact on those service users who currently receive the higher and middle rate allowance. The letter detailing the new contributions will also explain that all individuals have the right to ask the Council for a review of their charge for which they have been assessed if they consider that they cannot pay it. The Council has the discretion to reduce or waiver the charge through this appeals process.</p> <p>In February 2015, 1,762 people were in receipt of the DRE Allowance. This consists of:</p> <ul style="list-style-type: none"> • 79 people (4%) receiving the Lower Allowance • 668 people (38%) receiving the Medium Allowance • 1,002 people (57%) receiving the Higher Allowance • 13 people (1%) are currently appealing against their allowance <p>If the proposal is implemented it would mean that:</p> <ul style="list-style-type: none"> • The 668 people receiving the Medium Allowance may have to contribute £5.50 per week (or £286 a year) more towards the cost of their care • The 1,002 people receiving the Higher Allowance may have to contribute £5.48 per week (or £284.94 a year) more towards the cost of their care <p>Although this range of services is provided to people with a disability or physical frailty, the proposed change in the charging policy will continue to be applied universally and is based on whether a person is able to afford to contribute. The income levels are consistent with those set out in the Care and Support Statutory Guidance.</p> <p>In addition to the changes to the DRE allowance, the Council will be introducing a new policy to charge informal, unpaid carers who have eligible support needs of their own, and where the Council is meeting the needs of a carer by providing a service directly to a carer. Carers will be charged the full cost for the service they receive subject to a financial assessment – this is in line with the financial assessment for adult social care services.</p>		

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1f	<p>Are there positive impacts associated with this function? If yes, please list and give details.</p> <p>The proposed changes enable front line services for the most vulnerable who cannot afford to purchase services are maintained at a time when local authority budgets are being reduced.</p>
1g	<p>At this stage, what plans could be built in to address any negative impacts, and/or to add measures which promote a positive impact, or could you consider an alternative approach which may better achieve the promotion of equality?</p> <p>The letter detailing the new contributions will also explain that all individuals have the right to ask the Council for a review of their charge for which they have been assessed if they consider that they cannot pay it. The Council has the discretion to reduce or waiver the charge through this appeals process.</p>
1h	<p>The Council has a responsibility to promote positive attitudes to equal opportunities in public life. Has this responsibility been discharged in the application of this function? If yes give examples.</p> <p>No.</p>
1i	<p>Are there any Human Rights Issues? If so what are they?</p> <p>No.</p>
1j	<p>Is a full impact assessment required?</p> <p><input checked="" type="checkbox"/> YES – If you have established that there may not be equality of opportunity in 1c or assessed that there would be negative impact on an equality group in 1 d go to Stage 2</p> <p><input type="checkbox"/> NO - please sign off the process (stage 3) and fill in any actions identified, if any in the action plan.</p> <p><input type="checkbox"/> Don't know. i.e. not enough evidence. Please go to stage 2.</p>

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Stage 2 – full impact assessment

2a	Does the function affect or impact on the public, whether directly or indirectly?		
	<input checked="" type="checkbox"/> yes	<input type="checkbox"/> no	<input type="checkbox"/> Don't know
	<p><u>Provide any relevant information here.</u></p> <p>In February 2015, 1,762 people were in receipt of the DRE Allowance. This consists of:</p> <ul style="list-style-type: none"> • 79 people (4%) receiving the Lower Allowance • 668 people (38%) receiving the Medium Allowance • 1,002 people (57%) receiving the Higher Allowance • 13 people (1%) are currently appealing against their allowance <p>If the proposal is implemented it would mean that:</p> <ul style="list-style-type: none"> • The 668 people receiving the Medium Allowance may have to contribute £5.50 per week (or £286 a year) more towards the cost of their care • The 1,002 people receiving the Higher Allowance may have to contribute £5.48 per week (or £284.94 a year) more towards the cost of their care <p>Although this range of services is provided to people with a disability or physical frailty, the proposed change in the charging policy will continue to be applied universally and is based on whether a person is able to afford to contribute. The income levels are consistent with those set out in the Care and Support Statutory Guidance.</p>		
2b	Have complaints or feedback been received about the function and its effect on different equality groups?		
	<input type="checkbox"/> yes	<input type="checkbox"/> no	<input type="checkbox"/> Don't know
	<p><u>Provide evidence by documenting all reliable up to date information.</u></p> <p>A report with the proposed Policy was presented to the Council's Care Services Policy Development and Scrutiny Committee on Wednesday 21 January 2015. The report included a recommendation for the Council to agree to undertake a period of engagement with members of the public and key organisations in Bromley on the proposed Policy. The Strategic & Business Support Services division ran the engagement activity for the Adult Social Care Services and Finance Management divisions.</p> <p>The purpose of the engagement activity was to seek the views of service users, their families and key organisations in the borough on the proposed changes to the Disability Related Expenses element of the Non-Residential Contribution Policy. The respondents were also asked for their views on the other charging changes that result from the Care Act – including the 'arrangement fee', 'charging for carers' and 'backdating charges' - to support the implementation of the new policy from 6 April 2015.</p> <p>The engagement activity ran from Thursday 29 January until Wednesday 25 February 2015, and consisted of:</p> <ol style="list-style-type: none"> a) A hardcopy survey and supporting fact sheet sent to 2,000 people who are currently receiving a service from the Council b) An easy read version of the survey and supporting fact sheet sent to 399 people who are currently receiving a service from the Council who have a learning disability c) An online survey promoted via the Bromley MyLife website and via some of the Council's key partners in their newsletters (such as Bromley Mencap) d) An easy read version of the online survey promoted via the Bromley MyLife website and 		

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	<p>via some of the Council's key partners in their newsletters (such as Bromley Mencap)</p> <p>e) A telephone response line was created to provide further support and advice to people responding to the survey</p> <p>The number of responses</p> <p>In total there were 283 responses to the survey – including both the standard version (219 responses) and the Easy Read version (64 versions). The survey was sent to 2,399 people – including both the standard version (2,000 people) and the Easy Read version (399 people).</p> <p>This provides a response rate of 12%.</p> <ul style="list-style-type: none"> • 41% (116) of the respondents were responding for themselves, and of these - <ul style="list-style-type: none"> - 37% (105) currently receive a service from the Council - 4% (11) do not currently receive a service from the Council • 45% (126) of the respondents were responding on behalf someone they support or care for, and of these - <ul style="list-style-type: none"> - 40% (113) currently receive a service from the Council - 5% (13) do not currently receive a service from the Council • 1% (4) of the respondents were responding on behalf of an organisation, of which, all 4 classified themselves as a non-profit making organisation, charity or group • 13% (37) of people did not state who they were responding on behalf of <p>As part of the engagement activity, the survey asked people whether they had “any comments that [they] wish to share with the Council on the proposed changes to the Disability Related Expenses (DRE) allowances”.</p> <p>There were 143 comments provided for this answer (excluding “none”, “no”, “N/A”, etc.). Of these:</p> <ul style="list-style-type: none"> • 4% (6) were supportive of the proposal • 40% (55) disagreed with the proposal • 55% (76) provided other comments – such as: <ul style="list-style-type: none"> - A wish to have specific information for the individuals own needs - Comments relating to another proposal - A request for further information - Stating that they did not understand the proposal - Stating that the proposal did not affect them personally
2c	<p>Outsourced services - if the function is provided by external organisations/agencies on behalf of the Council please detail any arrangements you have to ensure that the function promotes equality; this may include contract conditions.</p> <p><u>Provide evidence by documenting all reliable up to date information.</u></p> <p>N/A</p>
2d	<p>Does the function have employment implications for Council staff</p> <p><input type="checkbox"/> yes <input checked="" type="checkbox"/> no <input type="checkbox"/> Don't know</p> <p><u>Provide evidence by documenting all reliable up to date information.</u></p> <p>N/A</p>

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2e	<p>If you have established that the function does have an adverse impact on one or more of the groups, then you must identify whether this is justifiable. If not, then the function must be changed. Please set out the adverse impact and the business justification for continuing with this situation.</p>			
2f	<p>Monitoring – give details of any monitoring being carried out on existing functions.</p>			
2f (i)	<p>If this is a new function, or not currently monitored, are you planning to monitor the impact of the function</p> <table style="width: 100%; border: none;"> <tr> <td style="border: none;"><input checked="" type="checkbox"/> yes</td> <td style="border: none;"><input type="checkbox"/> no</td> <td style="border: none;"><input type="checkbox"/> Don't know</td> </tr> </table> <p>If yes add details to action plan</p> <p>If no please explain why it is not considered appropriate to do so.</p>	<input checked="" type="checkbox"/> yes	<input type="checkbox"/> no	<input type="checkbox"/> Don't know
<input checked="" type="checkbox"/> yes	<input type="checkbox"/> no	<input type="checkbox"/> Don't know		
2g	<p>Consultation – If you have not carried out consultation, or if you need to carry out further consultation who will you be consulting with and by what methods?</p> <p>An engagement activity was undertaken during early 2015 – see 2b.</p>			
2h	<p>Evidence – what further evidence do you have about considerations with regard to equality issues that you have made concerning this function? e.g. audit reports, minutes from meetings or survey results</p>			
2i	<p>Publishing – if the equality impact assessment forms part of an overall review then the results should be published as part of any report that goes forward to Elected Members. If not the findings of the impact assessment should be published on our Council's web site.</p> <p>Add details to action plan</p> <p>This Impact Assessment will form part of the report to the Care Services Portfolio Holder on 26 March 2015.</p>			
2j	<p>Training and development - please list any staff training issues that have arisen as a result of conducting the impact assessment</p> <p>Add details to action plan</p> <p>N/A</p>			

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Stage 3 - GENERIC EQUALITY IMPACT ASSESSMENT ACTION PLAN please list actions that you plan to take as a result of this assessment, continuing on a separate sheet if necessary. If appropriate these actions should be added to any business/service plan for the function.

Issue	Action to be undertaken	Desired outcome	Action owner	Target date
Ensure that all service users are made aware of the revised policy and the routes to appeal.	<p>Ensure that the letter sent to all service users informing them of their contribution includes information on the appeals process.</p> <p>Make the revised policy available on the Bromley Council website and the Bromley MyLife website.</p>	Service users will be aware of their right to have their charge reviewed and have an individual DRE assessment as part of the appeals process.	Claudine Douglas Brown – Exchequer Manager	April 2015
Ensure the outcomes from the engagement activity are made available.	<p>Publish the outcomes from the engagement activity via:</p> <p>a) the report to the Care Services Portfolio Holder</p> <p>b) the Bromley MyLife website</p>	All people who responded to the survey are aware of (a) the feedback gathered through the engagement activity and (b) the final decision on the proposals.	Michael Watts – Senior Planning & Development Officer	26 March 2015
Ensure that people who do not have access to the internet are made aware of the revised policy.	Ensure that the borough's Care Choices brochure accurately reflects the revised policy.	All current & potential service users and their carers are aware of the revised charging policy.	Michael Watts – Senior Planning & Development Officer	June 2015
Review the impact of the new policy areas.	Conduct a review of the implementation of the revised policy.	The review will identify any negative implications arising from the implementation of the revised policy.	Claudine Douglas Brown – Exchequer Manager	October 2015

Signed:

Date: