

Interim IIA Report – Proposal for changes to the non-residential charging policy for Social Care

Each of the numbered sections below must be completed
Please state if the IIA is interim or final - interim.

1. Title of proposal

Proposal for changes to the non-residential charging policy for Social Care.

2. What will change as a result of this proposal?

- Financially Assess people who receive Independent Living Fund (ILF) funding.
- Increase the taper 1 from 60% to 65 % from April 2024 with a further 5% increase in the following three years to 75% from 1st April 2027.
- Removal of the 2nd Taper within the Financial Assessment Process over three years until removal in 2026/27.
- Approve the removal of the £50 board and lodgings disregard.
- Remove subsidy for frozen meals and the hiring of freezers and microwaves.
- Reduce the subsidy for Community Alarms from 30% to 0% over 2 years from 1 April 2024.
- Implement 10% increase in charge for Care at Home and transport and 6% increase for resource centre and transport to and from resource centres.
- Implement annual review of Non-residential Financial Assessments to ensure charges are increased in line with increases in income.

3. Briefly describe public involvement in this proposal to date and planned.

Users of services or carers have not provided comment. Further discussion and engagement will take place following any decision on the proposal by ELHSCP Integrated Joint Board.

East Lothian HSCP has a working group that considers Non residential Charging. The group is attended by Advocacy representation, elected member and officers from the Social work operational team and finance team.

4. Is the proposal considered strategic under the Fairer Scotland Duty?

Yes

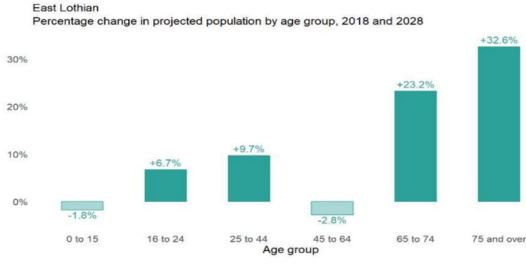
5. Date of IIA

18 March 2024 from 2pm – 4pm over MS Teams.

6. Who was present at the IIA? Identify facilitator, lead officer, report writer and any employee representative present and main stakeholder (e.g. Council, NHS)

Name	Job Title	Date of IIA training
Ogden-Smith, Jane (Facilitator)	Equalities and Engagement Officer, ELHSCP	Sept 2009, Dec 2022
Laura Kerr (Lead Officer)	General Manager Planning and Performance, ELHSCP	
Shannon Leslie	Service Manager	
Isobel Nisbet	General Manager Adult Social Care, ELHSCP	
Gareth Davies	Finance Manager Social Care, ELHSCP	
Susan Burton	ICAT Service Manager, ELHSCP	
Liam MacDonald	Principle Accountant, Health & Social Care, ELC	
Neil Munro	Project Support Manager, ELHSCP	Sept 2023

7. Evidence available at the time of the IIA

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal														
Data on populations in need	<ul style="list-style-type: none"> • East Lothian Joint Strategic Needs Assessment • East Lothian by numbers 	<p>Our population is changing. People are living longer</p> <p>Population Over the next 10 years, population growth will rise in East Lothian, especially in the over 65 year age group. See Graph 1 below.</p>  <table border="1"> <caption>East Lothian: Percentage change in projected population by age group, 2018 and 2028</caption> <thead> <tr> <th>Age group</th> <th>Percentage change</th> </tr> </thead> <tbody> <tr> <td>0 to 15</td> <td>-1.8%</td> </tr> <tr> <td>16 to 24</td> <td>+6.7%</td> </tr> <tr> <td>25 to 44</td> <td>+9.7%</td> </tr> <tr> <td>45 to 64</td> <td>-2.8%</td> </tr> <tr> <td>65 to 74</td> <td>+23.2%</td> </tr> <tr> <td>75 and over</td> <td>+32.6%</td> </tr> </tbody> </table> <p>Our population has grown at a higher rate in areas of higher deprivation, specifically within the 1st quintile (most deprived) to the 3rd quintile while the population has decreased in areas of lowest deprivation (4th and 5th quintiles).</p> <p>From 2018 to 2043, East Lothian's population is predicted to increase by a further 12.8% reaching a peak of 121,743 and will grow at faster rate than Scotland as a whole.</p> <p>Our resources are dwindling due to the impact of national austerity measures on public services, Brexit and recovery from Covid. We no longer have the ability to make capital investments. This, together with evidence from engagement, leads to placing much greater emphasis and resource into early intervention, intermediate care and other forms of support that enable people to live at home for as long as possible.</p>	Age group	Percentage change	0 to 15	-1.8%	16 to 24	+6.7%	25 to 44	+9.7%	45 to 64	-2.8%	65 to 74	+23.2%	75 and over	+32.6%
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Data on service uptake/access	As above and service-user information held on Mosaic.	<ul style="list-style-type: none"> • 273 people receive a chargeable service. 														

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal
		<ul style="list-style-type: none"> • 126 people pay towards their care (94 with LD or MH and 12 Older people) • 81 people have been assessed as being unable to pay. • 14 people have ILF so are not charged. • 53 people still need to be assessed.
<p>Data on socio-economic disadvantage e.g. low income, low wealth, material deprivation, area deprivation.</p>	<ul style="list-style-type: none"> • ONS Facts and Figures about people in East Lothian • NRS 2011 Census (out of date and awaiting information from NRS from 2022 Census) • Scottish Government Equalities Evidence Finder (by extrapolation) 	<p>Scottish Index of Multiple Deprivation</p> <p>East Lothian consists of 6 wards and 132 data zones, of which 8 data zones are in the 20% most deprived of Scotland.</p> <ul style="list-style-type: none"> • People living in the most deprived areas are statistically more likely to experience health inequalities. This means lower life expectancy, higher rates of disease, more long-term illness. • People living in the least deprived areas have a life expectancy 8 years (males) and 4.8 years (females) higher than those in the most deprived areas • The areas of highest deprivation in East Lothian are largely to the west of the county specifically in areas in Musselburgh, Tranent and Prestonpans. There are also pockets of deprivation in Haddington and Dunbar. • Around 95% of people in East Lothian living in the community live within an urban setting and 5% live in more rural settings.

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal
Data on equality outcomes	<ul style="list-style-type: none"> • ONS Facts and Figures about people in East Lothian • NRS 2011 Census (out of date and awaiting information from NRS from 2022 Census) • Scottish Government Equalities Evidence Finder (by extrapolation) 	<p>Our information about BME people living in East Lothian is poor as we are still awaiting information on this from the 2022 NRS Scottish Census (these are expected in the summer of 2024). We do know that we have Ukrainian and Syrian refugees, a Polish community, a South Asian community, migrant workers and asylum seekers in East Lothian. As the council does not facilitate a local equality network, we rely on statistics about use of translation and interpretation services and ethnicity recorded in education statistic to try to understand more about these communities, how many there are and where. Our own records show little uptake of our services by people in these groups and we are reaching out to the South Asian, Polish and Ukrainian communities to understand more about potential barriers to accessing services.</p> <p>We have also been engaging with the Deaf community around their needs for support from specialist workers who sign (BSL).</p>
Research/literature evidence	<ul style="list-style-type: none"> • Independent Review of Adult Social Care in Scotland • National Health and Wellbeing Outcomes Framework • East Lothian IJB Strategic Plan 	<p>The evidence tells us that people want person-centred care that is flexible and responds to people’s changing needs. It shows us that people wish to remain part of their communities and to be involved in those communities.</p> <p>This proposal has the potential to affect this in that it impinges on supports that help people to remain</p>

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal
	<ul style="list-style-type: none"> • East Lothian Dementia Strategy • East Lothian Carers Strategy 	<p>independent at home (community alarm, frozen meals), affordability of meaningful activities that support people to achieve personal outcomes (learning disability resources) and may have an impact on carers financially and in terms of temporary respite if resource provision becomes unaffordable, particularly where the increases are flat-rate and not means-tested.</p>
Public/patient/client experience information	<ul style="list-style-type: none"> • Reporting from statutory complaints procedure (including comments and compliments) • Patient Experience data • Care Opinion (East Lothian search) 	<p>Although there are complaints, most are resolved early in the statutory complaints procedure with very few requiring oversight from the SPSO. As well as complaints, there is a significant number of compliments for the quality of care for service-users and their carers and families, mainly to do with sensitivity, quality of support and commitment to person-centred care.</p> <p>Care Opinion feedback in relation to East Lothian tends to centre on health services.</p>
Evidence of inclusive engagement of people who use the service and involvement findings	See engagement information above	
Evidence of unmet need	<ul style="list-style-type: none"> • East Lothian Joint Strategic Needs Assessment • Engagement reports (listed above) • Service-user and patient experience data 	See information in section on Evidence.

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal
Good practice guidelines	Convention of Scottish Local Authorities (CoSLA) national guidance - COSLA-Social-Care-Charging-Guidance-2022-23.pdf	The guidance provides a framework for Councils to adopt whilst allowing for local accountability and discretion, and at the same time encourages Councils to adopt best practice in the development of their policies.
Carbon emissions generated/reduced data	n/a	
Environmental data	n/a	
Risk from cumulative impacts	n/a	
Other (please specify)	n/a	
Additional evidence required	n/a	

8. In summary, what impacts were identified and which groups will they affect?

Equality, Health and Wellbeing and Human Rights	Affected populations
<p>Positive</p> <p>While the impact to people in most cases may be small and assessed in relation to their income there were no significant positives to the proposal.</p> <p>There are positives in relation to policy changes with the introduction of a yearly financial assessment for everyone, which takes account of income increasing or decreasing so that appropriate charging is applied in a transparent and fair way.</p> <p>An robust appeals system is also in place for people to access.</p>	<ul style="list-style-type: none"> • People with protected characteristics (age; disability, including physical or learning disability, sight or hearing loss; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex, and sexual orientation) • Carers

Equality, Health and Wellbeing and Human Rights	Affected populations
	<ul style="list-style-type: none"> • People who do not have English as a first language, do not speak or read English, or have a low level of literacy • Deaf people who use BSL • People with lived experience of the justice system • Refugees, asylum seekers, migrant workers and people who have been trafficked • People in geographical areas or communities (for example, rural communities, peripheral communities in towns) • People living on a low income/socio-economic impact (Fairer Scotland)
<p>Negative</p> <ul style="list-style-type: none"> • There will be an increase in the amount that people are charged across the protected characteristics and vulnerable groups. Those of older age and with a learning disability generally require more services that are chargeable and will be affected the most. Mitigation: Where a person is in receipt of a number of services (alarm and meals for example) this will be taking into account within the financial assessment ensuring that the policy does not discriminate against different equality groups. If there were expenses that couldn't be met for an essential service, they would be met for the person in another way. Access to the welfare fund for example. • Flat rate charges are not means tested and don't form part of the financial assessment. Mitigation Ensure the Appeals process is well publicised and accessible. 	<p>All vulnerable groups listed above, in particular older people, people with disabilities, carers, ELHSCP staff, Also, considerations under Fairer Scotland Duty and impact of intersectionality.</p>

Equality, Health and Wellbeing and Human Rights	Affected populations
<ul style="list-style-type: none"> • Where someone contributes privately to the funds of the household that is taken into account in the financial assessment and so will impact on the charges being proposed. Mitigation: An appeals process is in place where people can give details of the income they contribute to a household in terms of lodgings to parents, for example. • The impact of charging will impact those in geographically locations. Additional travel costs can be a barrier and therefore people become even more socially isolated than they already may be. Mitigation: Travel costs would be taken into account in the financial assessment where flat rate charges are included in the assessment. This would reduce the impact on a person so they aren't unduly disadvantaged by being charged for their transport. <p>General Mitigation: An appeals process is in place where people's financial circumstances will be re-looked at following any charging decisions where they feel it is unfair or unaffordable.</p>	

Environment and Sustainability including climate change emissions and impacts	Affected populations
<p>Positive Following financial assessment people may have to pay for a taxi themselves and therefore become more inclined to use more environmental and sustainable transport options such as a bus or look at car sharing. While at the same time improving their own self-travel skills.</p>	<p>All vulnerable groups listed above, in particular older people, people with disabilities, carers, ELHSCP staff, Also, considerations under Fairer Scotland Duty and impact of intersectionality.</p>
<p>Negative n/a</p>	

Economic	Affected populations
<p>Positive People will continue to receive all the services that they are statutorily entitled to, and no particular group will be adversely affected or left financially destitute.</p>	<p>All vulnerable groups listed above, in particular older people, people with disabilities, carers, ELHSCP staff, Also, considerations under Fairer Scotland Duty and impact of intersectionality.</p>
<p>Negative n/a</p>	

- 9. Is any part of this policy/ service to be carried out wholly or partly by contractors and if so how will equality, human rights including children’s rights, environmental and sustainability issues be addressed?**

No

- 10. Consider how you will communicate information about this policy/ service change to children and young people and those affected by sensory impairment, speech impairment, low level literacy or numeracy, learning difficulties or English as a second language? Please provide a summary of the communications plan.**

Communications will be planned should this proposal be accepted with service-users, potential service-users, staff and partners. They will be produced in accessible formats taking into account the needs of people who do not have English as a first language or low literacy levels.

- 11. Is the plan, programme, strategy or policy likely to result in significant environmental effects, either positive or negative? If yes, it is likely that a Strategic Environmental Assessment (SEA) will be required and the impacts identified in the IIA should be included in this. See section 2.10 in the Guidance for further information.**

No

12. Additional Information and Evidence Required

Those in receipt of the Independent Living Fund (ILF) will be treated the same as everyone else in relation to a financial assessment with the ILF amount included.

Income protection measures that are currently contained within the non-residential charging policy will not be impacted.

13. Specific to this IIA only, what recommended actions have been, or will be, undertaken and by when? (these should be drawn from 7 – 11 above) Please complete:

Specific actions (as a result of the IIA which may include financial implications, mitigating actions and risks of cumulative impacts)	Who will take them forward (name and job title)	Deadline for progressing	Review date
ELHSCP will use Integrated Impact Assessment to identify adverse impacts of budget reductions and will report these to its core funders, East Lothian Council and NHS Lothian.	Jane Ogden-Smith, Equalities and Engagement Officer	Ongoing	March/April 2024
A communications plan will be developed to inform service-users, carers and staff.	Jen Jarvis, Communications Lead, ELHSCP	Should the proposal be accepted, in time to support the roll-out of the new charging regime.	

14. Are there any negative impacts in section 8 for which there are no identified mitigating actions?

No

15. How will you monitor how this proposal affects different groups, including people with protected characteristics?

By Integrated Impact Assessment.

16. Sign off by Head of Service

Name Laura Kerr

Date 20/03/24



General Manager, Planning and Performance, ELHSCP

17. Publication

Completed and signed IIAs should be sent to:

jogden-smith@eastlothian.gov.uk for publication on the ELHSCP [IIA Database](#) on www.eastlothian.gov.uk