

# IIA Report – Proposal to increase charges for self-funding residents at Crookston Care Home

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

## 1. Title of proposal

Proposal to increase charges for self-funding residents at Crookston Care Home.

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

It is proposed to increase charges for self-funding residents at Crookston Care Home over a three-year period. The new charges will apply to existing and new residents from 1<sup>st</sup> July 2024. New charges will not be applied to The Abbey Care Home and Belhaven Care Home, in light of their imminent closure.

The current rate of £1,117 does not meet the full cost of a bed at Crookston Care Home. The annual expenditure for the home in 2023/24 financial year is forecast at £5.149m for the 60 residents in the home, equating to a weekly cost per bed of £1,646 and therefore represents a shortfall of £529.

Finance have also forecast the cost of a placement at Crookston taking account of both the Bank of England inflation (3% for 2024/25, and 2% for 2025/26 and 2026/27) and the proposed £400,000 savings in 2024 through redesign of the service. Projected costs are shown below:

	Crookston			
	2023/24	2024/25	2025/26	2026/27
<b>Total Expenditure</b>	<b>£5,149,638</b>	<b>£4,870,455</b>	<b>£4,953,417</b>	<b>£5,038,147</b>
per bed	£85,827	£81,174	£82,557	£83,969
per bed per week	£1,646	£1,557	£1,583	£1,610

This proposal aligns with the Charging for Residential Accommodation Guidelines (CRAG) issued by the Scottish Government outlines the rules for charging residents within care home placements. The rules state that:

- Clause 01005: “requires local authorities to set the standard rate for local authority homes at an amount equivalent to the full cost to the authority of providing the accommodation”
- Clause 01009: “In local authority managed homes, the authority must charge the full cost of providing the accommodation – the “standard rate”. Where the local authority is satisfied that a resident is unable to

pay the standard rate, it must assess their ability to pay and, on the basis of that assessment, decide the lower amount which should be paid”.

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

There has been no public involvement in this decision.

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

Yes

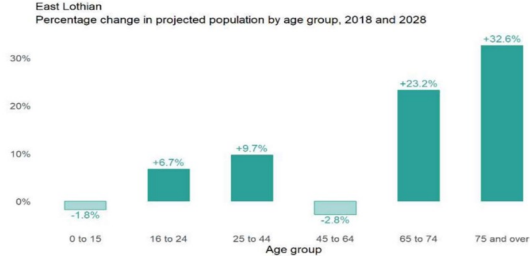
**5. Date of IIA**

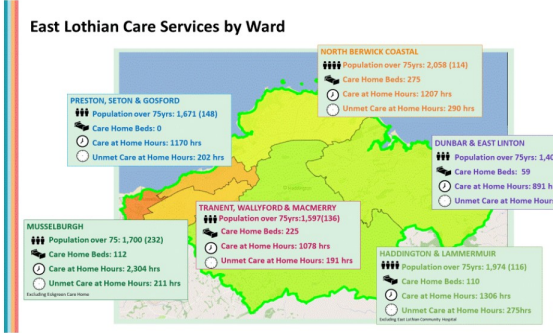
Wednesday 24<sup>th</sup> April 2024 from 10am to 11.30am by Teams.

**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)**

<b>Name</b>	<b>Job Title</b>	<b>Date of IIA training</b>
Ashley Hardy (Lead Officer)	ELHSCP Strategic Planning and Commissioning Officer	March 2023
Andrew Main	ELHSCP Strategic Planning and Commissioning Officer	March 2023
Alison Vikis	ELHSCP Team Manager, Care Homes, Adult Services	
Rod MacKenzie	ELHSCP Service Manager, Adult Social Work	
Pauline Skead	ELHSCP Unit Manager, Crookston Care Home	
Jess Wade	CEO, Carers of East Lothian	
Jane Ogden-Smith	ELHSCP Equalities and Engagement Officer	September 2009 and December 2021

## 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"> <li>• <a href="#">East Lothian Joint Strategic Needs Assessment</a></li> <li>• <a href="#">East Lothian by numbers</a></li> <li>• <a href="#">Planning Older People's Services Data Report (Jan 2024)</a></li> </ul>	<p>Our population is changing. People are living longer, and our previous research has informed us that many older people want to stay in their own homes for as long as possible.</p> <p><b>Population</b> 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> <ul style="list-style-type: none"> <li>• We can see that there will be a huge increase in the number of older people requiring services. The East Lothian population has grown by 20% since 2000 and at a higher rate than the Scottish population as a whole</li> <li>• Our population has grown at a higher rate in areas of higher deprivation, specifically within the 1<sup>st</sup> quintile (most deprived) to the 3<sup>rd</sup> quintile while the population has decreased in areas of lowest deprivation (4<sup>th</sup> and 5<sup>th</sup> quintiles).</li> <li>• 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.</li> <li>• East Lothian currently has a higher female than male population, although the largest percentage age group in both categories is currently in the middle aged group (aged 45-59).</li> </ul>	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	Crookston residents roll	There are currently 11 residents who would be affected under the proposal.																																			
Data on socio-economic disadvantage e.g. low income, low wealth, material deprivation, area deprivation.		<p>The graphic below outlines that:</p> <ul style="list-style-type: none"> <li>• All areas have insufficient care at home provision, notably the North Berwick and Dunbar areas</li> <li>• East Lothian has, as a whole area, an over-provision of care home capacity</li> <li>• Preston Seton and Gosford Area requires additional Care Home provision.</li> </ul>  <table border="1" data-bbox="836 869 1398 1200"> <caption>East Lothian Care Services by Ward</caption> <thead> <tr> <th>Ward</th> <th>Population over 75yrs</th> <th>Care Home Beds</th> <th>Care at Home Hours</th> <th>Unmet Care at Home Hours</th> </tr> </thead> <tbody> <tr> <td>Preston, Seton &amp; Gosford</td> <td>1,671 (148)</td> <td>0</td> <td>1170 hrs</td> <td>202 hrs</td> </tr> <tr> <td>North Berwick Coastal</td> <td>2,058 (114)</td> <td>275</td> <td>1207 hrs</td> <td>290 hrs</td> </tr> <tr> <td>Dunbar &amp; East Linton</td> <td>1,405</td> <td>59</td> <td>891 hrs</td> <td>202 hrs</td> </tr> <tr> <td>Musselburgh</td> <td>1,700 (232)</td> <td>112</td> <td>2,304 hrs</td> <td>211 hrs</td> </tr> <tr> <td>Tranent, Wallyford &amp; Macmerry</td> <td>1,507(136)</td> <td>225</td> <td>1078 hrs</td> <td>191 hrs</td> </tr> <tr> <td>Haddington &amp; Lammermuir</td> <td>1,974 (116)</td> <td>110</td> <td>1306 hrs</td> <td>275hrs</td> </tr> </tbody> </table>	Ward	Population over 75yrs	Care Home Beds	Care at Home Hours	Unmet Care at Home Hours	Preston, Seton & Gosford	1,671 (148)	0	1170 hrs	202 hrs	North Berwick Coastal	2,058 (114)	275	1207 hrs	290 hrs	Dunbar & East Linton	1,405	59	891 hrs	202 hrs	Musselburgh	1,700 (232)	112	2,304 hrs	211 hrs	Tranent, Wallyford & Macmerry	1,507(136)	225	1078 hrs	191 hrs	Haddington & Lammermuir	1,974 (116)	110	1306 hrs	275hrs
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Data on equality outcomes	<ul style="list-style-type: none"> <li>• <a href="#">ONS Facts and Figures about people in East Lothian</a></li> <li>• <a href="#">NRS 2011 Census</a> (out of date and awaiting information from NRS from 2022 Census)</li> <li>• <a href="#">Scottish Government Equalities Evidence Finder</a> (by extrapolation)</li> <li>• <a href="#">East Lothian by numbers</a></li> </ul>	<p>East Lothian consists of six wards and 132 data zones, of which eighth data zones are in the 20% most deprived of Scotland.</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• People living in the least deprived areas have a life expectancy eight years (males) and 4.8 years (females) higher than those in the most deprived areas</li> <li>• The areas of highest deprivation in East Lothian are largely to the west of the county specifically in areas in Musselburgh, Tranent and</li> </ul>																																			

Evidence	Available – detail source	<b>Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal</b>
		<p>Prestonpans. There are also pockets of deprivation in Haddington and Dunbar.</p> <p>Around 95% of people in East Lothian living in the community live within an urban setting and 5% live in more rural settings</p> <p>This proposal affects self-funders, who are by definition, people who have savings/assets of over £35,000. Should their capital eventually fall below this threshold, they would automatically be subject to means-testing that would enable them to pay a percentage of their care home costs at a fair rate in line with their income. Should their savings/assets be completely depleted over the course of time, their care home costs would be met in full by ELHSCP. The mechanisms for this are set out in the UK Government’s Charging for Residential Accommodation Guidance (CRAG).</p> <p>The people in the scope of the proposal have the protected characteristics of age and disability. The proposal would be applied to each self-funding resident in the same way and should their savings and assets fall below the £35,000 threshold, their costs would be mitigated as described in the paragraph above.</p> <p>As those affected having savings/assets in excess of £35,000, the IIA group did not think that this would result in material hardship under</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
		<p>Fairer Scotland Duty. Again, if their funds fell below this threshold, systems were in place to ensure their continued residence at Crookston.</p> <p>This decision should have no impact on people’s human rights. People are protected in line with the National Assistance Act 1948 and may also choose to find alternative accommodation, with which ELHSCP would provide information and support.</p>
Research/literature evidence	<a href="#">The Charging for Residential Accommodation Guidelines</a>	<p>Under the National Assistance Act 1948, where a local authority arranges residential care for a person it is required to carry out a financial assessment and charge the person such sums as they are assessed as being able to pay. The financial assessment is made using the National Assistance (Assessment of Resources) Regulations 1992. The regulations are updated annually. The latest amendment to the 1992 regulations is S.I. 2011/724.</p> <p>The Charging for Residential Accommodation Guide (CRAG) provides guidance to local authorities on how to interpret and apply the regulations.</p>
Public/patient/client experience information	<a href="#">Care Inspectorate Report on Crookston Care Home, July 2023</a>	<p>In their most recent inspection of Crookston in July 2023, the Care Inspectorate rated the service thus:</p> <ul style="list-style-type: none"> <li>• How well do we support people's wellbeing? 5 - Very Good</li> <li>• How good is our leadership? 5 - Very Good</li> </ul> <p>Grades range from 1=unsatisfactory to 6=excellent.</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
		<p>They noted:</p> <p>‘We observed warm and compassionate interactions between people and staff. Staff clearly knew people well and were fond of the people they cared for; this was reflected in the feedback we gained from people experiencing care about staff; one person commented "they are all lovely", with another stating "I can't fault the staff". Professionals visiting the service described their observations, one commented "I have seen compassionate, respectful and dignified support".’</p>
Evidence of inclusive engagement of people who use the service and involvement findings	n/a	n/a
Evidence of unmet need	n/a	n/a
Good practice guidelines	<ul style="list-style-type: none"> <li>• <a href="#">National Care Home Standards</a></li> </ul>	<p>These are:</p> <ol style="list-style-type: none"> <li>1 Informing and deciding</li> <li>2 The written agreement</li> <li>3 Your personal plan</li> <li>4 Management and staffing</li> </ol> <p>Using the service (standards 5 to 11)</p> <ol style="list-style-type: none"> <li>5 Lifestyle</li> <li>6 Eating well</li> <li>7 Keeping well - healthcare</li> <li>8 Keeping well - medication</li> <li>9 Private life</li> <li>10 Supporting communication</li> <li>11 Expressing your views</li> </ol>

<b>Evidence</b>	<b>Available – detail source</b>	<b>Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal</b>
		The recent Care Inspectorate Report details that Crookston performs well in meeting these standards.
Carbon emissions generated/reduced data	n/a	n/a
Environmental data	n/a	n/a
Risk from cumulative impacts	n/a	n/a
Other (please specify)	n/a	n/a
Additional evidence required	n/a	n/a

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

<b>Equality, Health and Wellbeing and Human Rights</b>	<b>Affected populations</b>
<p><b>Positive</b></p> <p>The income generated by the increased charges would relieve some financial pressure on budgets for health and social care provision in East Lothian, supporting both the running of Crookston and other health and wellbeing support in East Lothian. <b>Please note: the IIA Group felt it would be helpful to have more information about what would happen with the money raised by the increased charging, setting out how it would be reinvested.</b></p>	<p>Older people People with disabilities</p>
<p><b>Negative</b></p> <ul style="list-style-type: none"> <li>The Group felt that there were potentially negative impacts for self-funders at Crookston who were only going to be there for a short time, having to find more money. There was discomfort that these people would have to pay more money for the same services than people who were able to live in Crookston for longer. They felt that people who would be living at Crookston for longer periods</li> </ul>	<p>Older people People with disabilities Carers</p>



Equality, Health and Wellbeing and Human Rights	Affected populations
<p>would feel less impact, particularly if they dipped below the £35,000 threshold. <b>Mitigation: any resident whose income dipped below the £35,000 threshold would automatically be supported through the National Assistance Act 1948 and 1992 Regulations.</b></p> <ul style="list-style-type: none"> <li>• The group acknowledged that residents affected would be unhappy with the rise in charges and would find it upsetting. <ul style="list-style-type: none"> <li>▪ <b>Mitigation 1: residents could choose to move to a home that they thought was less expensive. More affordable options were limited but available in East Lothian, and there were more places becoming available in the independent sector with the opening of new care homes in Haddington. However, it was unclear if these new places would be any more affordable.</b></li> <li>▪ <b>Mitigation 2: the staggered introduction of the charging increases should reduce the overall impact on residents' finances.</b></li> <li>▪ <b>Mitigation 3: clear, careful and timely communication with residents and carers/family would be helpful. The IIA Group suggested that this should include an FAQ sheet for residents and families/carers.</b></li> </ul> </li> <li>• Some of the group worried about the impact on carers who had concerns about effect of the charging rise on any potential inheritance. However, it was generally felt that it would not have an impact on carers' day-to-day income and that carers should not be relying on future inheritance in their forward financial planning – that money belonged to the resident and should be used to finance their care. <b>Mitigation – the Group felt that carers' disappointment in this regard could be managed to a certain extent by clear, timely and careful communication, explaining why the rise was necessary (CRAG) and what safeguards were in place should their relative's assets/savings fall below £35,000.</b></li> <li>• The group also touched on the plight of adult children of care home residents who were still living</li> </ul>	

Equality, Health and Wellbeing and Human Rights	Affected populations
<p>in a family home that might have to be sold off to pay for care. Spouses and civil partners had protection as assets were usually split when one partner went into residential care. Adult children still living in a family home did not have this protection.</p> <p><b>Mitigation: clear and careful communication could highlight this eventuality to those affected, ensuring that they were aware of the potential for their family home being sold and allowing them to make alternative arrangements for accommodation. If necessary, they could be put in touch with support in this regard, like ELC's Housing Options.</b></p>	

Environment and Sustainability including climate change emissions and impacts	Affected populations
<b>Positive</b>	n/a
<b>Negative</b>	n/a

Economic	Affected populations
<b>Positive</b>	More funding would be available to support Crookston and other health and social care support.
<b>Negative</b>	Residents would spend their own financial reserves more quickly. This might not have a significant impact on them in terms of their ongoing accommodation because of the statutory supports in place, but may, in the end, place additional financial pressures on ELHSCP in meeting some or eventually all of their placement costs.

**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.**

Should this proposal be adopted, a communications plan will be developed, which will take into account the individual communication requirements of residents, families and carers.

**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**

None.

**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:**

<b>Specific actions (as a result of the IIA which may include financial implications, mitigating actions and risks of cumulative impacts)</b>	<b>Who will take them forward (name and job title)</b>	<b>Deadline for progressing</b>	<b>Review date</b>
Development of a communications plan as outlined above	Jen Jarvis, ELHSCP communications lead	If the proposal is adopted, as soon thereafter as possible	Within six months

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
Should the proposal be adopted, subsequent IIAs to establish the impact of increased charging on residents, families and carers.	Jane Ogden-Smith, ELHSCP Equalities and Engagement Officer	Within six months of introduction of charging increase.	Within one year

**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?**

Through monitoring by care home staff/care home social work team and subsequent IIAs.

**16. Sign off by Head of Service**



Name

Date 24/04/24

**17. Publication**

Completed and signed IIAs should be sent to:  
[jogden-smith@eastlothian.gov.uk](mailto:jogden-smith@eastlothian.gov.uk) for publication on the ELHSCP [IIA Database](#) on [www.eastlothian.gov.uk](http://www.eastlothian.gov.uk)