## Summary of Responses to Adult Social Care Charging Policy Review

## Consultation on Proposed Changes to Cambridgeshire County Council's Adult Social Care Charging Policy

1.0	Introduction
1.1	The proposals on the revisions to Cambridgeshire County Council's Adult Social Care charging policy were consulted on widely for a 12 week period from 23 September to 15 December 2019 via:
	<ol> <li>3486 letters sent to individual service users who might be impacted by the changes (or their nominated representatives), inviting them to complete a paper survey, from which 363 completed responses were received.</li> <li>An online survey published on the Council's website, from which 154 completed submissions were received.</li> <li>Six public consultation events from which comments were recorded in detail.</li> <li>A telephone line and dedicated e-mail address were provided offering support with completion of the survey. 151 calls and emails were received.</li> <li>Direct contact to 33 key local voluntary and community sector partner organisations.</li> <li>Presentations to all five Cambridgeshire Adult Social Care Partnership Boards and to the Adult Social Care Forum, which include expert by experience representatives.</li> <li>Seven drop-in meetings for adults with learning disabilities or autism, held by the</li> </ol>
	Speak Out Council.
1.2	Also the Council published a Frequently Asked Questions document online which was available during the consultation period.
1.3	The following is a summary of the responses received from the consultation, in general and in response to the five specific changes proposed.
2.0	General Responses to the Consultation
2.1	<ul> <li>The various meetings which took place to raise awareness of the proposed changes to the Adult Social Care charging policy did bring forward some generic points around the current charging policy not related to any one specific proposal. Three general overarching themes emerged:</li> <li>1. The financial assessment process in Cambridgeshire is regarded as not fit for</li> </ul>
	purpose and needs to be reviewed. It needs to be more personalised to people's individual circumstances and provide clear information in a timely and efficient manner.

	2.	The Disability Related Expenditure (DRE) assessment process in Cambridgeshire is regarded as not fit for purpose. Better guidance needs to be given on what can be considered as a disability related expense, the process needs to be easier to manage, proportionate, and personalised to people's individual circumstances.
	3.	The proposals do not take into account the stress and demands on carers, not only in terms of providing care but also because they are often having to step in to cover any shortfalls out of their own money.
2.2		e Council received formal responses to the consultation from partner ganisations including:
	1.	<b>Pinpoint</b> – "Care support budget reductions over the last decade, particularly to support access to the community have meant that disability benefits have played a significant part in mitigating the effects of those reductions for disabled people. The new charging may have a significant role in reducing the ability of disabled people to lead purposeful lives outside their homes."
	2.	<b>MND Association</b> – "The Association acknowledges there are significant financial pressures being faced by Local Authorities as they try to best meet the social care needs of their residents and that difficult decisions need to be made. We also understand that the proposals contained within Cambridgeshire County Council's consultation are in line with the Care Act. However, we believe the proposals will negatively and disproportionately impact on people living with and affected by severely disabling conditions such as Motor Neurone Disease (MND). We recommend the Council does not progress with these policies."
	3.	<b>Alzheimer's Society –</b> "Alzheimer's Society recognise the challenges that local authorities face in providing social care to an increasingly aging population within the context of funding pressures and an 11% decline in successful CHC applications nationally over the last 4 years. However, we are extremely concerned that the changes proposed to Cambridgeshire County Council's charging policy will have a disproportionate impact on some of the most financially vulnerable people in the community.
		a) Cambridgeshire County Council decided against changes to its financial assessment two years ago. The changes proposed now are in response to increased financial pressure and the need to look at ways to continue to provide social care affordably. However, the Council must also recognise that vulnerable people affected by dementia continue to need high quality support and care. The needs of people requiring social care haven't changed in the last two years while incomes have decreased at a time of growing cost.
		b) People living with dementia and their carers already face catastrophic costs of care. Alzheimer's Society regularly hear from people who have spent all of their life savings on care. Due to the complexity of the condition, the cost of dementia care is on average 15 per cent more expensive than other types of social care – we call this the 'Dementia Penalty'. We are campaigning for change in the way that social care is funded in England through our 'Fix Dementia Care' campaign.

	No res questi	ponse to this	32						
		lo not agree	285	58.76%					
	Respo Yes, I		200	Percentage 41.24%					
3.1	(59%) c	lisagreeing, see tab	le below:	·	) (41%) agreeing and 285				
3.0	Proposal 1 – To change the Minimum Income Guarantee figure used to the level set by the Department of Health and Social Care. (This proposal applies only to those of State Pension age or older.)								
	However, Healthwatch Cambridgeshire and Peterborough were able to comment that, as a general point, they would always look to see that the most vulnerable people are protected in any changes.								
	This was because in the pre-General Election 'purdah' period it took advice from Healthwatch England and assessed all of its activities for potential political implications. As Healthwatch Cambridgeshire and Peterborough considered that there were significant political implications in the proposed changes it decided, following discussions with its Chair and Board, that it was not able to engage fully with the consultation and therefore was not in a position to submit a formal response.								
2.3	Healthwatch Cambridgeshire and Peterborough was unable to submit a formal response to the consultation.								
		affordability since	the Care Act ca vill be responsit	ame in, and what gu	uidance they have in place, g changes know how to				
	e)	discretion not to ch check the changes	harge and insis are affordable	t they will judge ead	ounty Council can use their ch case individually to ety would urge the Council n the grounds of				
	d)	d) Although the consultation document sets out how many people the individual change will effect, it is not clear how many people will be affected by two or more of the proposals. Has the Council analysed what would happen in the case of someone affected by a lowered MIG, increased respite costs and additional benefits included in the financial assessment all in one go?							
	c) We fear that any increased revenue the Council will generate in the short terr will be outweighed by significant increases in costs for caring for people. High costs may make it difficult to access social care services and place more pressure on the health service. With moves towards the integration of health and social care, the system for charging for social care should not be looked a in isolation from health care provision.								

3.2	162 individual comments were made within the submitted surveys in relation to this proposal. The comments can be summarised into the following three main points:
	<ol> <li>The proposed change would impact disproportionately on the most vulnerable members of society, people who can least afford to pay more – even £5.50 per week.</li> </ol>
	<ol> <li>Cambridgeshire is an expensive place to live and having a locally set slightly higher Minimum Income Guarantee level for those of state pension age and above reflects this.</li> </ol>
	<ol><li>The impact of this change would put increased strain on carers who are already carrying the burden of care.</li></ol>
0.0	
3.3	Themes from the consultation meetings about proposal one are outlined below:
	<ol> <li>The Minimum Income Guarantee (MIG) level has been frozen for some years and this has already had a detrimental impact on people's income and standard of living. People's real disposable income has been eroded and the proposed change would make this worse.</li> <li>The cost of living in Combridge phine is higher than in many parts of the</li> </ol>
	<ol> <li>The cost of living in Cambridgeshire is higher than in many parts of the country which also has an impact on people's standard of living. The MIG does not reflect regional differences.</li> </ol>
	3. The MIG should be index linked to inflation.
	<ol> <li>The MIG is an ageist policy – it isn't fair that younger people have lower MIG levels, further protecting older people's income levels adds to this inequality.</li> </ol>
	<ol> <li>People with sensory impairments have a higher average cost of living than the general population and so any reduction in the MIG level would have a higher impact on them.</li> </ol>
	<ol> <li>The proposed change will have a huge impact on older people and their carers, who have the highest support needs. These people are already on low incomes and struggling to make ends meet.</li> </ol>
	<ol> <li>Although the proposed increase per week appears small, for many people it is a significant percentage of their weekly/annual income.</li> </ol>
	<ol> <li>Any additional strain on the family income may mean that some carers feel they are unable to pay, so choose to reduce the care they pay for and this could lead to carer breakdown and have the knock-on effect of increased costs to the Council.</li> </ol>
	9. Some people mentioned that there are other financial benefits available specifically to older people, for example free bus travel, winter fuel payment, etc. that may not be available to other groups of people. Some people thought this would be inequitable and therefore using the MIG level set by the Department of Health and Social Care for people of State Pension age and older would bring this group into line with the approach for other adults where the Council applies the nationally set MIG level for their age/circumstance.
3.4	Responses received from partner organisations in relation to proposal one are summarised below:
	<b>MND Association –</b> "The Association recommends that recipients of social care in Cambridgeshire should continue to be entitled to the same MIG levels as previously

	held, so they can better mana Association notes that Camb a result of this policy change important to note that these in progressive and terminal con inevitable and will only increa	County Council prop xisting prevention a I be of limited use f a as MND, where in	boses to use the savings as and short-term services. It is for people living with atense support needs are			
<b>Cambridgeshire and Peterborough Clinical Commissioning Group</b> – " amount of additional money is relatively small but may be a barrier to the m deprived. The number of people impacted is relatively high at 1300-1500. T cumulative impacts of this change and other changes to social care funding associated grants have not been assessed."						
4.0	Alzheimer's Society – "we have concerns that the proposed change does not sufficiently take into account the higher costs for people living in Cambridgeshire … In addition, the minimum income guarantee does not reflect the unique needs and additional costs of caring for someone living with dementia. For example, people with dementia may not show interest in eating and drinking sufficient amounts. They often need special diets or foods that may be out of reach to someone on a low income and may not be taken into account as part of the calculation of minimum income. Many elderly people feel the cold, and this is particularly the case for someone living with dementia. In addition, it is common for people with dementia and their carers to spend a large proportion of their day in the home, requiring it to be heated for longer. Opportunities to get out of the house and be part of the community are more difficult for people with dementia, with cost of travel and the significant rurality of the county being particular challenges."					
4.0	Proposal 2 – To include all financial assessment calcul Disability Living Allowance, Independence Payment.	lation: Atte	ndance Allowanc	e; Care component of		
4.1	469 people responded to this proposal in the survey with 122 (26%) agreeing and 347 (74%) disagreeing, see table below:					
	Response	Number	Percentage			
	Yes, I agree	122	26.01%			
	No, I do not agree	347	73.99%			
	No response to this question	48				
4.2	148 individual comments were proposal. The comments can					
	<ol> <li>People who receive higher rates of disability benefits do so for a reason, i.e. their care and daily living needs are higher and this would penalise them due to their disability and/or complex needs.</li> </ol>					

	<ol> <li>The current Disability Related Expenditure assessment process in Cambridgeshire is difficult to engage with, does not reflect the real additional costs that people have related to their disabilities, and is not fit for purpose.</li> <li>The potential increased cost per week is not affordable and would have a long-term detrimental impact on individuals and their families.</li> </ol>
4.3	Themes from the consultation meetings about proposal two are outlined below:
	<ol> <li>The higher rates of disability benefits are awarded to people to reflect all the additional 'living' costs that people have because of their disability – it isn't just given to them for their care.</li> <li>The potential increased charge of £28.95 per week would have a huge impact on people already on low income and their families.</li> <li>The people affected by this proposal have already suffered from multiple and ongoing cuts to their income and support over many years, because of the impact of austerity and the erosion of welfare benefits.</li> <li>People have found the Disability Related Expenditure (DRE) process difficult to manage, time consuming and too rigid. Many said that if felt like a 'tick box' exercise and that the financial assessment was not taking into account their individual circumstances/those of the person they care for.</li> <li>People said that more items needed to be considered as possible DRE.</li> <li>For people with sensory impairments the current standard DRE allowance of £20.00 per week is not enough to cover their additional needs. For example, a person with a visual impairment living in a rural area without public transport may need to use a taxi to go to an appointment and this could use up their weekly DRE allowance in one go.</li> <li>People felt that the current standard DRE allowance of £20.00 per week needed to be higher.</li> <li>People felt that the current standard DRE allowance of £20.00 per week needed to be higher.</li> <li>People felt that the current standard DRE allowance of £20.00 per week needed to be considered as possibility benefits will have a greater impact on them.</li> <li>Some people felt that it was unfair that when they were awarded higher rates of some disability benefits because of their needs that the Council could then potentially 'take them away' again as part of the financial assessment process.</li> <li>Some people felt that the most vulnerable members of society with the highest support needs</li></ol>
4.4	Responses received from partner organisations in relation to proposal two are summarised below:
	<b>MND Association</b> – "We take issue with the wording in the consultation, which states: " <i>Many people in receipt of social care support receive disability benefits which are paid specifically to help people pay for their care and support.</i> " To be clear, PIP is not specifically designed for the payment of care and support costs. Rather, PIP is a disability benefit designed to help meet the extra daily living and mobility costs associated with living with a disability, a far broader remit." " <i>MND Costs</i> , a research report written in 2017 by Demos on behalf of the MND Association, found that on average people living with MND face an additional cost of £12,000 a year, before

taking loss of earnings into account" "These include higher energy bills, increase insurance costs, and increased transportation costs."						
	<b>Cambridgeshire and Peterborough Clinical Commissioning Group –</b> "These people are likely to be older and or have more disabilities than the general population. These additional costs are likely to have a significant impact on the individuals on whom they fall. This may lead to them being unable to fund care which will have an adverse effect on health outcome in these vulnerable groups and an additional impact on health service attendance and health service activity, both through primary, secondary and Continuing Health Care routes. The CCG would like to monitor impacts alongside the County Council."					
	Alzheimer's Society – "For people with dementia or other degenerative conditions, the costs of additional disability related expenditure may go up over time. If Cambridgeshire County Council include any of the rate of disability related benefits in the calculation, the Council must ensure that their financial assessments are flexible to take into account these variations in expenditure, not just deduct a set amount. In addition, it is vital that the system is responsive to changes in expenditure eg a community alarm, they shouldn't have to wait months for their financial assessment to reflect this, with potential negative impacts their health and wellbeing. Before implementing this change, we would like to see the Council review what the current waiting time is when a new financial assessment is requested and set enforceable targets to ensure that people affected are not financially penalised when their care needs change."					
5.0	Proposal 3 – To change t calculated, using 'resider			rt-term respite care is		
<b>5.0</b>		ntial' care cha	arging rules.			
	<i>calculated, using 'resider</i> 439 people responded to thi (68%) disagreeing, see table	ntial' care cha is proposal in e below:	the survey with 139			
	calculated, using 'resider 439 people responded to thi (68%) disagreeing, see table Response	is proposal in below:	the survey with 139			
	calculated, using 'resider 439 people responded to thi (68%) disagreeing, see table Response Yes, I agree	ntial' care cha is proposal in e below: Number 139	the survey with 139 Percentage 31.66%			
	calculated, using 'resider 439 people responded to thi (68%) disagreeing, see table Response	is proposal in below:	the survey with 139			
	calculated, using 'residen 439 people responded to thi (68%) disagreeing, see table Response Yes, I agree No, I do not agree No response to this	ntial' care cha is proposal in e below: Number 139 300	the survey with 139 Percentage 31.66%			
	<ul> <li>calculated, using 'resider</li> <li>439 people responded to thi (68%) disagreeing, see table</li> <li>Response</li> <li>Yes, I agree</li> <li>No, I do not agree</li> <li>No response to this question</li> <li>133 individual comments we proposal. The comments ca</li> <li>1. People will still have co proposed change woul</li> <li>2. People were worried th contribution and that it</li> </ul>	ntial' care cha is proposal in e below: Number 139 300 78 ere made with n be summari osts to pay wh id put a huge s nat this could i was not a fair	arging rules. the survey with 139 Percentage 31.66% 68.34% in the submitted su sed into the following ilst in respite accomposite accompos	9 (32%) agreeing and 300		

	dementia, under the Care needs and if the carer is el respite care become prohi an alternative plan to meet local authority cannot avoi	Act, respite ca igible, the Cou bitive for carers the needs of o d not fulfilling t	re serves the func ncil has a duty to s, Cambridgeshire carers that they ar his duty due to a l	arrange it. If the costs of County Council must have e under a duty to meet. A ack of resources."		
6.0	Proposal 4 – To introduc service users whose soc the Council acting as the appointee.	ial security b	enefits and finan	ces are managed by		
6.1	436 people responded to th (59%) disagreeing, see tab		the survey with 17	7 (41%) agreeing and 259		
	Response	Number	Percentage			
	Yes, I agree	177	40.60%			
	No, I do not agree	259	59.40%			
	No response to this question	81				
	<ol> <li>This proposal discriminates against people who do not have family or friends to undertake this service. In these circumstances the Council should bear the cost of this work.</li> <li>For those who agreed with the proposal they felt that making a charge for the service was fair but that it should be kept to a reasonable amount.</li> <li>Also people felt that the £1,000 savings balance should be higher.</li> </ol>					
6.3	Themes from the consultati	on meetings al	oout proposal four	are outlined below:		
	<ol> <li>Some people thought that it was unfair to charge vulnerable people for this service because they didn't have family/friends who could help them instead.</li> </ol>					
	<ol> <li>Some people thought that the proposed weekly fees were too high – for example, some people said it shouldn't cost that amount to manage somebody's money if they were in residential care.</li> </ol>					
	<ol> <li>People thought that the savings/capital balance should be higher to allow for capital item replacements, unexpected expenses (such as a boiler breaking down), holidays, funeral costs, etc. Suggestions ranged from £3,000 - £6,000.</li> </ol>					
			•	•		
		ral costs, etc. S at the propose penditure item.	Suggestions range d charge should b	ed from £3,000 - £6,000. De considered as a		

6.4	Responses received from partner organisations in relation to proposal four are summarised below:						
	<b>Cambridgeshire and Peterborough Clinical Commissioning Group</b> – "This proposal disadvantages the most deprived and vulnerable who have no-one else to manage their benefits. The annual amount paid is a significant total of the capital threshold CCG recommendation is to increase the capital threshold to £25,000."						
	companies and solicitors who opposed by Cambridgeshire C would be even more costly, ho	<b>Alzheimer's Society</b> – "Alzheimer's Society recognises that there are professional companies and solicitors who charge more for being an appointee than the sum being proposed by Cambridgeshire County Council, and that deputyship as an alternative would be even more costly, however, before implementing this change, we would like the Council to examine the following points:					
	<ul> <li>We have some concerns or someone living with demeninterests'. Although it is cheassistance, the Council shocouncil may be in the positi and also the beneficiary of was clear third party (DWP example from the Court of interest would be less acute</li> <li>It is widely accepted that "palthough the basis for charge of charges. If the Council d and reasonable. We would charging for these services Our view is that acting as a general care and support d charging on a means tester.</li> <li>We would like to know whe assessment bearing in minimum the public sector equality different sector.</li> </ul>	atia, being s eaper than build be sati- ion of deter that decision for example Protection i e. professiona ging is not of ecides to ir like the Co an appointe uties for wh d basis. ether the Co d the duty of	signed up to this scher the alternatives and the sfied that there is no co- mining that it is in som on if there is a policy of le) guidance about char regarding deputyship, I" appointees can char clear and there is no go inpose charges they slow ouncil to confirm what they have calculated we e as a last resort is par hich they shouldn't be	me in their 'best hey can't be without conflict of interest. The heone's best interests if charging for it. If there arging, as there is for then the conflict of rge for their service guidance about the level hould be proportionate legal basis it has for what the charge will be. Int of the Council's charging, or only an equalities impact			
7.0	Proposal 5 – To charge an a people living in the commun care but have chosen to ask	nity who ai	re able to afford the f	ull cost of their own			
		443 people responded to this proposal in the survey with 177 (40%) agreeing and 266 (60%) disagreeing, see table below:					
7.1		•	the survey with 177 (4	0%) agreeing and 266			
7.1		•	the survey with 177 (4 Percentage	0%) agreeing and 266			
7.1	(60%) disagreeing, see table b	elow:		0%) agreeing and 266			

	No response to this 74	1			
	question				
7.2	<ul> <li>114 individual comments were man proposal. The comments can be sufficient of the comments can be suffer about care choices - and the moment and so did not ag</li> <li>2. For some of those who did ago thought it should be for a small 3. Some people thought that if performing the service.</li> </ul>	ummari good qu d some pree with ree in p ller amo	sed into the following to uality service and inform people did not think thin the proposed charge. rinciple to increasing the punt.	three main points: mation and advice is was happening at ne charge, they	
7.3	Themes from the consultation mee 1. Some people supported the pr	·			
	<ol> <li>Some people supported the provide the provide the properties of the properties of the properties.</li> <li>Some people agreed with the thought it should be at a lower in the proposal.</li> <li>People thought that there need about care choices for self-function.</li> <li>People said that if the Council needed to deliver a better qua people mentioned about invoid the properties.</li> </ol>	principl r level th ded to h nders. I was go ality serv	e of an annual charge han the maximum of £4 be more information ar hing to introduce an an vice for the money – fo	for the service, but 400 per year mentioned nd advice available nual charge then it	
7.4	Responses received from partner of summarised below: Cambridgeshire and Peterborou disadvantages a vulnerable group disability issues which mean that the Recommendation: A capital thresh fee."	ugh Cli o of peo they are	nical Commissioning ple who presumably h e not willing to arrange	<b>g Group –</b> "This ave other frailty / e their own care.	
	<b>Alzheimer's Society –</b> "It is well acknowledged that self-funders prop up the social care system by paying higher home care and care home rates than those who have care arranged by the Council. Although the consultation document states that they benefit from lower fees as a result of asking the LA to help arrange care rather than by themselves, a lot of older people (especially people affected by dementia) may have little knowledge of the social care system and the rules in which it operates and may feel they have no choice but to pay these costs to get any help.				
	If Cambridgeshire County Council see them introduce information ar choice to educate themselves abo arrange care for themselves."	nd advid	e services to offer res	idents a legitimate	

8.0	Additional Documents
8.1	Additional documents available online:
	<ul> <li>Consultation Findings Report: <u>https://www.cambridgeshire.gov.uk/data/assets/pdf_file/0016/12256/Adult-Social-Care-charging-policy-consultation-findings-report-20-08-01-20.pdf</u></li> <li>Blank copy of the consultation survey: <u>https://www.cambridgeshire.gov.uk/data/assets/pdf_file/0017/12257/Adult-Social-Care-charging-policy-consultation-survey-08-01-20.pdf</u></li> </ul>