

**CHANGES TO THE FAIRER CONTRIBUTIONS POLICY**

*To:* **Adults Committee**

*Meeting Date:* **9 November 2017**

*From:* **Executive Director, People & Communities**

*Electoral division(s):* **All**

*Forward Plan ref:* **N/A**

*Key decision:*

**No**

*Purpose:* **The report sets out a number of possible changes to the Fairer Contributions Policy that would increase the income raised through service user contributions towards their care and support. Any change to the Fairer Contributions Policy will require a consultation. The Committee is being asked to consider the options and confirm which options they would want to pursue and include in a consultation.**

*Recommendation:* **The Committee is asked to**

**a) Consider the options for changing the Council's Fairer Contributions Policy**

**b) Confirm which options the Committee want officers to take forward for consultation**

**c) Request interim feedback from the consultation in January and further feedback in February**

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## **1. BACKGROUND**

- 1.1** Care and support provided under the Care Act 2014 is subject to means testing to determine how much each service user should contribute to the cost of their care and support. The process of financial assessment used to determine this contribution is carried out in line with Department of Health guidance. This income is used within the Adults budget to offset the cost of the care and support provided to people in Cambridgeshire and contributes to the Council's ability to support the people in most need of care and support.
- 1.2** As part of the business planning process for 2018/19, LGSS colleagues have been asked to consider whether there are any changes that could be made to the Council's Fairer Contributions Policy, in light of national changes or practice in other Local Authorities that could increase the income collected.
- 1.3** This report sets out a number of potential changes that could deliver increased income and assist the Council in delivering care and support within the available budget.
- 1.4** Any changes to the Fairer Contributions Policy have to be consulted on to fit with Government requirements around changes to contribution/charging policies. The length of consultation required is 12 weeks to fit with the Compact with the voluntary sector. Compacts were established to support joint working between Local Authorities and the voluntary sector including the timeframe for meaningful consultation.
- 1.5** Arrangements are in place to undertake a consultation, informed by the decisions from the Members of the Committee.

## **2. Comparison of Contribution/Charging Policies**

- 2.1** LGSS colleagues have sought to compare our Fairer Contributions Policy with similar policies for other local authorities, focusing on our statistical neighbours (Local Authorities of a similar size and mix of market towns/rurality) and Peterborough City Council and Milton Keynes Council. Of the 17 Local Authorities approached, six provided responses which have been taken into account in the options set out below.
- 2.2** The introduction of the Care Act 2014 and the associated Care and Support Statutory Guidance in April 2015 intended to harmonise charging rules for non-residential care across the country. The intention was to have a more consistent approach to charging for non-residential care services.
- 2.3** While the Care Act 2014 has achieved this to some extent, there are still differences across the country in how Local Authorities charge for specific services and the level of benefits taken into account in financial assessments.
- 2.4** Having reviewed the charging policies for the Local Authorities that responded to requests for information, LGSS colleagues concluded that there are four options that Cambridgeshire County Council can consider to increase the value of income being received for specific services. The table below sets out these options and identifies which Authorities operate in this way:

## 2.5

	Increased amount of Disability Benefits Included in Financial Assessment	Respite Charged under residential Rules	Appointee Charging	Direct Debits
Cambridgeshire County Council	No	No	No	Yes - 41% uptake
Northamptonshire County Council	No - about to go into public consultation	Yes	Yes £7.50 per week - about to consult to increase to £10 per week for residential care and £12.50 for community care.	Yes - 60% uptake
Milton Keynes Council	Yes	Yes	Yes £12.50 per week	Yes - 35% uptake
Peterborough City Council	Yes	Yes	Yes £5 per week	No
Hertfordshire County Council	No - about to go to public consultation	Yes for unplanned, no for planned	No	Yes - 40% uptake
Buckinghamshire County Council	Yes	Yes	Yes - £2.50 per week	Yes - 66% uptake
Hampshire County Council	Yes for PIP only	No	No	Yes - unknown acceptance rate

2.6 The detail of each option is set out below, with the range of the potential increase in income and the risks and benefits of each change.

## 3.0 Disability Benefits Review

3.1 Prior to the Care Act 2014, Cambridgeshire County Council (CCC) used the Fairer Charging Guidance issued by the Department of Health in order to create a policy for calculating contributions towards social care & support services in the community. This has since been superseded by the Care Act 2014.

3.2 The Fairer Charging Guidelines included guidance on how disability benefits should be treated within the financial assessment. The current disability benefits are Attendance Allowance (AA), Disability Living Allowance (DLA), and Personal Independence Payment (PIP). These benefits are paid out at different rates dependent upon the level of personal support required. The current rates are as follows:

	AA	DLA	PIP
Low	£55.65	£22.00	£55.65 (known as standard rate)
Middle	None	£55.65	None
High	£83.10	£83.10	£83.10 (known as enhanced rate)

3.3 The Fairer Charging Guidelines previously stated that Local Authorities' should only take into account the lower or middle rate of any disability benefits if that Local Authority is not providing any night time services. This is a principle which is currently within CCC's Contributions Policy and is applied within the financial assessment.

3.4 Within the Care and Support Statutory Guidance, it states what income can be included within the financial assessment. The wording used is as follows:

"Any income from the following benefits must be taken into account when considering what a person can afford to pay towards their care from their income:"

The guidance then goes on to list Attendance Allowance, Disability Living Allowance (Care Component) and Personal Independence Payment (Care Component). There is no reference to only the lower or middle rate of disability benefits being included within the financial assessment unless the Local Authority is providing night time support.

3.5 There are three options available to the Council:

- Do nothing and continue to assess individuals who receive the enhanced rate of disability benefit as if they were receiving the standard or lower rate, where the Council does not provide night time support.
- Amend the CCC Contributions Policy to enable the Financial Assessment Team to charge against the higher rate of Attendance Allowance, Disability Living Allowance or Personal Independence Payment.
- Amend the CCC Contributions Policy to enable the Financial Assessment Team to charge against the enhanced rate of Personal Independence Payment only.

#### Option 1 – Do nothing

3.6 The CCC Contributions Policy can be left as is and any service users receiving the higher rate of Attendance Allowance, Disability Living Allowance or Personal Independence Payment will be treated as if they only receive the standard rate, unless the Council provides night time support.

#### Option 2 – Amend the CCC Contributions Policy to allow the Financial Assessment Team to take into account the higher rate of Attendance Allowance, Disability Living Allowance and Personal Independence Payment

3.7 The existing policy could be amended to allow for additional income to be included within the financial assessment.

There are currently 1,306 service users who have been financially assessed who have the high rate of Attendance Allowance (AA), Disability Living Allowance (DLA) or Personal Independence Payment (PIP) but are assessed as if they only have the low or middle rate. Of these service users between 500 – 800 are assessed to make a contribution. If the higher rate of these benefits were included in the financial assessment, you could expect a relevant service user's contribution to increase by £27.45 per week. Therefore, the additional income of between £713,700 and £1,141,920 could be achieved.

3.8 For the purpose of this calculation, we have only included the service users who are currently assessed to make a contribution. However, it is possible that by changing the

policy, some nil charge customers may be asked to make a contribution and therefore further additional income may be obtained.

- 3.9 Consideration should be given to the impact that this would have on the service users whose contribution would increase by £27.45 per week and who are using this money for additional care and support over and above that provided by the Council. This may also have an impact on debt, if service users feel unable to manage to pay the increase in contributions.
- 3.10 It should also be noted that the Disability Rights Handbook states that the higher rate of AA or DLA is paid to service users who require personal support through the night. If the Council decides to adopt this option, there is a risk of legal challenge should the Council not be providing night time services.
- 3.11 With PIP, the award of the enhanced rate is not dependent upon the applicant having support needs through the night. The DWP use a points based system to determine which rate the applicant will be awarded. The option of applying this change to people with PIP only does not carry the same level of risk of legal challenge as applying the change to people on DLA and AA. It should be noted that DLA is being phased out and replaced by PIP (see option 3 below).
- 3.12 Benefits
- Increased contributions means increased income generation for the Council.
- 3.13 Risks
- Although invoices for increased amounts will be issued, there is the risk that invoices may not be paid. Increased charges can mean that service users who previously paid their invoices on time may not pay their invoices at all, leading to increased debt figures.
  - The financial impact on the service user could be significant, especially to those customers who are accustomed to paying a lower amount. This could cause financial hardship, worry and anxiety for service users who are classed as very vulnerable.
  - Increased charges can lead to an increased amount of complaints and financial appeals which will also have an impact on staff resource.
  - Due to the nature of the change, there is an increased risk of legal challenge but this can be reduced by applying the change to people with PIP only.

Option 3 – Amend the CCC Contributions Policy to allow the Financial Assessment Team to take into account the Enhanced Rate of Personal Independence Payment.

- 3.14 There are currently 311 service users who are assessed against the standard rate of PIP and receive the enhanced rate. Of these 311 service users, 159 service users are assessed as nil charge and are therefore not asked to contribute towards the cost of their care. If the decision was made to increase the amount of PIP taken into account in the financial assessment, the contribution from the 152 service users who contribute towards their care would be increased by £27.45 per week. The increase to Council income would therefore be as follows:

Weekly increase £27.45 x 152 = £4,172

Annual Increase £27.45 x 152 x 52 = £216,964

- 3.15 For the purpose of this calculation, we have only included the service users who are currently assessed to make a contribution however, by changing the policy, some nil charge service users may be asked to make a contribution and therefore further additional income may be obtained.
- 3.16 Some thought should be given to the affect that this will have on applicable service users as set out in option 2 above. This may also have an impact on debt as with any increase in contributions.
- 3.17 It should be noted that the DWP are currently still moving claimants from receiving DLA to PIP. Each claimant is reviewed upon request from the DWP and is required to undertake a new assessment. The number of service users receiving PIP will continue to increase as the DWP require people to be reassessed for PIP. The potential for increased client contributions would continue to increase as service users move across to PIP, if this approach is adopted.
- 3.18 Benefits
- Increased contributions means increased income generation for the Authority.
  - Less likelihood of legal challenge because there is no link between the enhanced rate of PIP and night time support.
- 3.19 Risks
- Although invoices for increased amounts will be issued, there is the risk that invoices may not be paid. Increased charges can mean that customers who previously paid their invoices on time may not pay their invoices at all; leading to increased debt figures.
  - The financial impact on the customer could be significant, especially to those customers who are accustomed to paying a lower amount. This could cause financial hardship, worry and anxiety for customers who are classed as very vulnerable.
  - Increased charges can lead to an increased amount of complaints and financial appeals which will also have an impact on staff resource.
  - Due to the nature of the change, there is an increased risk of legal challenge.

#### Potential Mitigation

- 3.20 To mitigate the financial impact on service users, consideration could be given to offering an enhanced rate of Disability Related Expenditure (DRE) allowance for those service users who are assessed against the high / enhanced rate of their disability benefits (this would be on top of the standard DRE allowance of £20 per week).
- 3.21 DRE allows the Local Authority to recognise the additional costs of having a disability for example higher heating or laundry costs, and to disregard this amount within the financial assessment. The Council uses a standard DRE allowance of £20 per week that can be applied without details evidence of expenditure. Alternatively, the service user can ask for an individual assessment and provide evidence of higher expenditure in support of a request for more than £20 per week for DRE.
- 3.22 An enhanced level of DRE allowance could be set at different rates, at the discretion of the Council, and would impact on the £27.45 per week increased contribution in the following

way:

£5 per week enhanced DRE - £22.45 per week increased contribution  
£10 per week enhanced DRE - £17.45 per week increased contribution  
£15 per week enhanced DRE - £12.45 per week increased contribution

3.23 If this approach was adopted the income generation for the authority would be as follows:

#### Option 2

£5 per week – between £583,700 and £933,920 additional income  
£10 per week – between £453,700 and £725,920 additional income  
£15 per week – between £323,700 and £517,920 additional income

#### Option 3

£5 per week -  $£22.45 \times 159 = £3,570$  per week (£185,617 per year)  
£10 per week -  $£17.45 \times 159 = £2,775$  per week (£144,277 per year)  
£15 per week -  $£12.45 \times 159 = £1,980$  per week (£102,937 per year)  
The income under Option 3 would continue to increase as more people move onto PIP.

3.24 Alternatively, if service users feel that the Council is not taking their night time needs into account in the financial assessment, they can ask for a personalised DRE assessment and provide evidence of the costs they have associated with their night time needs.

#### Potential Impact on Service Users

3.25 The Council does not hold information on how service users use their state benefits. The Council is only empowered to request information on the level of benefit for the financial assessments that we are required to undertake. However, it is understood that people will use the benefits differently, depending on their individual circumstances.

3.26 There will be many ways in which people will use their benefits, but a few examples of how people may use their benefits are set out below:

- To buy additional care or support including care and support that gives family carers a break,
- Spend the money on activities to enhance their quality of life.
- The money may be accrued to spend on one-off items e.g. replacing a washing machine or to have a break, with or without family carers.

3.27 The impact of the proposed changes will be different depending on how people are currently using their benefits.

## **4. Short Term Respite Accommodation Charge Review**

4.1 When a service user has a period of short term respite accommodation, traditionally the Council has charged for this under non-residential charging rules. Generally, non-residential care contributions are lower than residential contributions and so the Council

could achieve additional income by charging for short term respite accommodation under residential care rules.

4.2 The Care and Support Statutory Guidance section 8.34 states the following:

“A short-term resident is someone provided with accommodation in a care home for a period not exceeding 8 weeks, for example where a person is placed in a care home to provide respite care. Where a person is a short-term resident a local authority may choose to assess and charge them based on the rules for care or support arranged other than in a care home.”

4.3 This guidance allows the Council to charge under non-residential rules, but the Council does not have to and may charge under residential rules. It should be noted that long term (over 8 weeks) temporary accommodation is charged using residential care rules.

4.4 In 2016/17, there were 66 service users charged under non-residential rules for short term respite accommodation. The average contribution for these service users was £54.94 per week compared to an average contribution for short-term residential care of £179.74 per week when calculated under residential rules. This is a difference of £124.80 per week.

The average stay in short term respite accommodations is 22 days.

4.5 The options available are as follows:

- Do nothing and continue to assess individuals who receive short term respite accommodation under non-residential rules.
- Amend the CCC Contributions Policy to enable the Financial Assessment Team to assess individuals who receive short term respite accommodation under residential rules.

Option 1 – Do nothing

4.6 The CCC Contributions Policy can remain unchanged and any service users who receive short term respite accommodation continue to be assessed under non-residential rules.

Option 2 - Amend the CCC Contributions Policy to enable the Financial Assessment Team to assess individuals who receive short term respite accommodation under residential rules.

4.7 The Council has the option to amend the Fairer Contributions Policy so that all service users who receive short term respite accommodation are assessed under residential rules. This would mean that all income (except statutory disregarded income) would be included and allowances would be made for the personal expense allowance and any housing costs while in short term respite accommodation. The Council would retain the discretionary ability to increase the personal expense allowance should they wish to.

During 2016/17, 66 service users had a period of short term respite accommodation. If the same trend continues in 2017/18, the following income generation can be expected:

Weekly increase -  $£124.80 \times 66 = £8,236.80$

Annual increase -  $£124.80 \times 66 \times 3$  (average number of weeks in short term respite) = £24,710



#### 4.8 Benefits

- Increased contributions means increased income generation for the Authority.
- A more consistent approach to charging for short term accommodation.

#### 4.9 Risks

- Although invoices for increased amounts will be issued, there is the risk that invoices may not be paid. Increased charges can mean that service users who previously paid their invoices on time may not pay their invoices at all, leading to increased debt figures.
- Increased charges can lead to an increased amount of complaints and financial appeals which will also have an impact on staff resource.
- • For service users who receive both non-residential services and short term respite accommodation, the difference in charges can lead to confusion and anxiety.

#### 5.0 Appointee Charge

5.1 The Council offer an appointeeship service to our service users who are not able to manage their own finances. Appointeeship is offered to those whose assets are below the level that requires a deputyship arrangement to be in place. *(monetary level for deputyship needs adding)*

5.2 Acting as an appointee is not a statutory service. However, there are many benefits to providing this service. It means that we can ensure that our service users finances are properly managed including paying all invoices and contributions due for their care. As this is not a statutory service, the Council can apply an administration charge in accordance with the Local Government Act.

5.3 The cost of being an appointee for a non-residential service user is much higher as it requires more active involvement. As a result, we are proposing that an increased charge is applied to eligible service users in the community.

5.4 The Council currently operates as appointee for 47 residential care service users and 2 appointee cases for non-residential service users.

5.5 In Northamptonshire County Council and Milton Keynes Council, the appointeeship charge is only applied to those service users who have above £1,000 in capital. It was felt that £1,000 in capital was sufficient to safeguard service users against any unexpected expenditure that may arise. In Cambridgeshire, there are 35 service users who have capital above £1,000.

5.6 If the Council decides to apply a charge for appointeeships, it is proposed that the income generated from the current service users (see below) is reinvested into the Client Funds Service in LGSS to increase capacity. This increased capacity would allow the service to assist additional service users, both in residential care and the community; reducing the current waiting list. There are currently 3 appointeeship service users and 6 deputyship service users awaiting to be allocated to an officer.

5.7 It is estimate that on average the cost of providing the appointee service to residential service users is £10 per week. The cost for providing the appointee service to non-

residential service users is £12.50 per week.

5.8 The options available are as follows:

- Do nothing and continue to provide the appointeeship service free of charge.
- Agree to apply an appointee charge for all service users who Cambridgeshire County Council act as an appointee for.
- Agree to apply an appointee charge for all service users who have capital above £1,000.

Option 1 – Do nothing

5.9 The appointeeship service is currently free of charge and therefore, making no change represents a lost opportunity to increase income to Cambridgeshire County Council.

Option 2 – Agree to apply an appointee charge for all service users who Cambridgeshire County Council act as an appointee for without a capital “buffer”.

5.10 The Council could apply an appointee charge for all service users to help cover the cost of providing this non-statutory service. The recommended charge is £10 per week for residential care service users and £12.50 per week for non-residential service users. If this is agreed, the following income could be generated:

47 residential customers at £10 per week = £24,440 per annum  
2 non-residential service users at £12.50 per week = £1,300 per annum  
Total = £25,740 per annum

5.11 Benefits

- Increased charges means increased income generation for the Authority.
- If the additional income was reinvested into the Client Funds Service, the additional resource would mean that more service users are supported and more income is generated. This could also reduce the amount of debt as client contributions would be paid by the service.

5.12 Risks

- A charge for the Appointee function may result in unhappy customers / representatives.
- If no capital buffer is allowed, the service user may have unexpected expenditure which they cannot afford to pay as a result of the appointee charge.
- Risk of legal challenge as the Care and Support Statutory Guidance does not specifically state that an administration charge can be applied.
- Increased complaints.

Option 3 – Agree to apply a charge for the appointee function for all service users who have capital above £1,000.

5.13 The Council could apply an appointee charge for all service users who have capital above £1,000, to help cover the cost of providing this non-statutory service. The recommended charge is £10 per week for residential care service users and £12.50 per week for non-residential service users. If this is agreed, the following income could be generated:

35 residential customers at £10 per week = £18,200 per annum  
2 non-residential service users at £12.50 per week = £1,300 per annum  
Total = £19,500 per annum

#### 5.14 Benefits

- Increased charges means increased income generation for the Authority.
- If the additional income was reinvested into the Client Funds Service, the additional resource would mean that more service users are supported and more income is generated. This could also reduce the amount of debt as client contributions would be paid by the service.
- By allowing a £1,000 capital buffer, the service user is safeguarded for any unexpected expenditure.

#### 5.15 Risks

- A charge for the Appointee function may result in unhappy customers / representatives.
- Risk of legal challenge as the Care and Support Statutory Guidance does not specifically state that an administration charge can be applied.
- Increased complaints.

### 6. Direct Debits

- 6.1 A direct debit is an instruction from a service user to their bank or building society. It authorises the Council to collect varying amounts from their accounts but only if advanced notice of collection has been given to the service user. For those service users who have already chosen to pay by direct debit, the Council issues invoices for care 21 days before a direct debit transaction is processed.
- 6.2 Once a direct debit has been setup, the payments for care are collected automatically. If the Council wants to collect a different amount, we have to tell the service user first, which we do by issuing the invoice 21 days prior to collection.
- 6.3 Direct debits are the easiest and most convenient way for a service user to pay their regular care invoices. Direct debits come with a guarantee so service users are automatically protected by three important safeguards:
- An immediate money back guarantee from their bank if an error has been made in the payment of their direct debit.
  - Advanced notice if the date or the amount changes.
  - The right to cancel at any time.
- 6.4 Direct debits also give customers peace of mind, as it is one of the safest and most reassuring ways of paying their care invoices:
- Payments are made automatically, so bills and payments are never forgotten, lost in the post or delayed by postal problems.
  - The Council have had to pass a careful vetting process and are monitored by the banking industry.
  - The Direct Debit Guarantee protects the service user and their money and it's offered by almost all banks and building societies.

- 6.5 Direct debits also save the service user time by taking away the hassle associated with paying bills on time, and puts an end to queuing at banks and post offices. Service users will find it easier to stay on top of their care bills.
- 6.6 Over 60% of the Council's service users are assessed to make a financial contribution towards the cost of their care. This means that a large proportion of service users will receive an invoice every 4 weeks.
- 6.7 We currently rely on service users to choose the payment method which appears to be the most appropriate for them; whether this be writing a cheque, paying at a bank or post office, making a credit / debit card payment online or over the phone, or by setting up a direct debit.
- 6.8 A direct debit is much cheaper for the authority to process, and take's far less manual involvement.
- 6.9 We want to make the payment of invoices as easy and convenient as possible for our service users so that they don't forget to pay. By setting up a direct debit to pay their care invoices, service users only need to know that they have sufficient funds in their account so that payment can be collected. There is no need for our service users to worry about making manual payments.
- 6.10 It is also considerably more likely that invoices will be paid if a direct debit is set up. This means that the Adult Social Care debt will likely reduce and additional funds will be available for front line services.
- 6.11 Of the service users who are required to contribute to the cost of their care and support, only 41% have opted to pay by direct debit.
- 6.12 In November 2015, Northamptonshire County Council agreed that direct debit would be the default payment method for Adult Social Care services. As a result, and through continuous promotion, the level of service user's paying by direct debit increased from 50% to 60%. This also contributed to a reduction in the 0 – 360 day debt figures.

#### Option 1 – Do nothing

- 6.13 The Council can continue to offer a range of ways for payments to be made, as is the case now, with no specific promotion of direct debits. This would mean that the income process would continue to be less cost efficient and the benefits of increased direct debit uptake would not be received.

#### Option 2 – Agree to make direct debit the default payment method for Adult Social Care invoices.

- 6.14 The Council could decide to change the contributions policy so that direct debit is the default payment method for Adult Social Care invoices. This would mean that the service user would be required to setup a direct debit, ideally before care services begin. In exceptional circumstances, the Council could agree to an alternative payment method for individual service users.

#### 6.15 Benefits

- Increased likelihood that service users will settle their invoices, reducing the amount of invoices that become debt.
- Direct debits are cheaper to process than traditional payment methods.
- Service users will find their invoices easier to manage.
- Service users are protected by the direct debit guarantee.

#### 6.16 Risks

- Some service users may prefer the more manual payment methods and may resist setting up a direct debit.
- Some service users may have accounts that do not allow direct debit facilities.
- Service users may have had difficulties with invoice accuracy in the past and therefore they may be reluctant to setup a direct debit.

### **3. ALIGNMENT WITH CORPORATE PRIORITIES**

#### **3.1 Developing the local economy for the benefit of all**

There are no significant implications for this priority.

#### **3.2 Helping people live healthy and independent lives**

The proposals above have been considered alongside the need to support people to live healthy and independent lives and continue to meet the requirements of government guidance on financial assessments for service user contributions to care and support packages.

#### **3.3 Supporting and protecting vulnerable people**

The proposals above have been considered alongside the need to support and protect vulnerable people and continue to meet the requirements of government guidance on financial assessments for service user contributions to care and support packages.

### **4. SIGNIFICANT IMPLICATIONS**

#### **4.1 Resource Implications**

The proposed changes would increase the level of income collected as contributions to care and support, and reduce the level of debt accruing where contributions are not paid.

#### **4.2 Procurement/Contractual/Council Contract Procedure Rules Implications**

There are no significant implications within this category.

#### **4.3 Statutory, Legal and Risk Implications**

The options set out above detail where there may be vulnerability to legal challenge and alternative options are offered to mitigate this risk.

#### 4.4 Equality and Diversity Implications

The proposals only impact on those people assessed as having eligible needs for social care support which is a means tested service, and requires the Council to undertake financial assessments to determine the contribution that each individual should make towards their care and support.

#### 4.5 Engagement and Communications Implications

The report proposes a 12 week consultation, in line with the COMPACT, with interim feedback to the Adults Committee in January.

#### 4.6 Localism and Local Member Involvement

There are no significant implications within this category.

#### 4.7 Public Health Implications

There are no significant implications within this category.

Implications	Officer Clearance
Have the resource implications been cleared by Finance?	Yes or No Name of Financial Officer:
Have the procurement/contractual/ Council Contract Procedure Rules implications been cleared by Finance?	Yes or No Name of Financial Officer:
Has the impact on statutory, legal and risk implications been cleared by LGSS Law?	Yes or No Name of Legal Officer:
Have the equality and diversity implications been cleared by your Service Contact?	Yes or No Name of Officer:
Have any engagement and communication implications been cleared by Communications?	Yes or No Name of Officer:
Have any localism and Local Member involvement issues been cleared by your Service Contact?	Yes or No Name of Officer:
Have any Public Health implications been cleared by Public Health	Yes or No Name of Officer:

