

## West Dunbartonshire Health and Social Care Partnership Equality Impact Assessment Tool 2021/22

### EQUALITY IMPACT ASSESSMENT FORM

| <b>Section 1: Policy/Function/Decision (PFD) Details</b>                                                                                                                 |                                                                                                                                                                                                                                        |
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| A <b>PFD</b> is understood in the broad sense including the full range of functions, activities and decisions the Health and Social Care Partnership is responsible for. |                                                                                                                                                                                                                                        |
| Name of PFD:                                                                                                                                                             | WDC Charging Policy for HSCP services                                                                                                                                                                                                  |
| Lead Team & other departments/sections/ partners involved:                                                                                                               | <b>Julie Slavin – project sponsor</b><br><b>Laura Evans - project manager</b><br><b>Care at Home, COPT, Learning Disabilities, Mental Health, Children Care, Addictions, SDS ideas, Carers WD, Residential and Adult day services.</b> |
| Responsible Officer                                                                                                                                                      | <b>Julie Slavin – project sponsor</b>                                                                                                                                                                                                  |
| Impact Assessment Team                                                                                                                                                   | <b>Care at Home, Adult community, Learning Disabilities, Mental Health, Children Care, Addictions, SDS ideas, Carers WD.</b>                                                                                                           |
| Is this a new or existing                                                                                                                                                | New                                                                                                                                                                                                                                    |
| Start date: (the assessment should be started prior to PFD development/drafting or at the early stages of review): <b>28/05/2020</b>                                     |                                                                                                                                                                                                                                        |
| End date (this should allow for the assessment to inform decision-making): <b>Target date is end of July</b>                                                             |                                                                                                                                                                                                                                        |
| What are the main aims of the <b>PFD</b> ?                                                                                                                               | <b>To approve the charging policy so it is clear for services what can and cannot be charged for.</b>                                                                                                                                  |
| Who are the main target groups/                                                                                                                                          | <b>Care at Home, COPT, Learning Disabilities, Mental Health, Children Care,</b>                                                                                                                                                        |

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| Who will be affected by the PFD?                                                                                                                                                               | <b>Addictions, SDS ideas, Carers WD, Residential and Adult day services.</b>                                                                                                                                                                                               |
| Relevance (of PFD to the general equality duties and equality groups, also record if there is no relevance giving reasons/ evidence)                                                           |                                                                                                                                                                                                                                                                            |
| <b>Yes: Relevant as this policy is about public service deliver</b>                                                                                                                            |                                                                                                                                                                                                                                                                            |
|                                                                                                                                                                                                | If yes, complete all sections, 2-9                                                                                                                                                                                                                                         |
|                                                                                                                                                                                                | If no, complete only sections 8-9                                                                                                                                                                                                                                          |
|                                                                                                                                                                                                | If don't know, complete sections 2& 3 to help assess relevance                                                                                                                                                                                                             |
| <b>Section 2: Evidence</b>                                                                                                                                                                     |                                                                                                                                                                                                                                                                            |
| Please list the available evidence used to assess the impact of this PFD, including the sources listed below. Please also identify any gaps in evidence and what will be done to address this. |                                                                                                                                                                                                                                                                            |
| <b>Available evidence:</b>                                                                                                                                                                     |                                                                                                                                                                                                                                                                            |
| Consultation/ Involvement with community, including individuals or groups or staff as relevant                                                                                                 | <b>The following teams will be approached to ensure equality is in place within the charging policy:<br/>Carers WD<br/>SDS group<br/><br/>Care at Home, COPT, Learning Disabilities, Mental Health, Children Care, Addictions, and Residential and Adult day services.</b> |
| Research and relevant information                                                                                                                                                              | <b>COSLA guidance has been referred to when writing the charging policy</b>                                                                                                                                                                                                |
| Officer knowledge                                                                                                                                                                              | <b>Chief financial officer for HSCP is involved</b>                                                                                                                                                                                                                        |
| Equality Monitoring information – including service and employee monitoring                                                                                                                    | <ul style="list-style-type: none"> <li>• <b>Service managers were involved in this equality assessment</b></li> <li>• <b>Senior social workers from each service were also involved in the review of the charging policy.</b></li> </ul>                                   |
| Feedback from service users, partner or other organisation as relevant                                                                                                                         | <b>The following teams will be approached to ensure equality is in place within the charging policy:<br/>Carers WD</b>                                                                                                                                                     |

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|                                                                                    | <b>SDS group(Includes carers, service users, board and managers)</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| Other                                                                              | N/A                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| <b>Are there any gaps in evidence?</b> Please indicate how these will be addressed |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| Gaps identified                                                                    | <ul style="list-style-type: none"> <li>• Financial assessments are inconsistent</li> <li>• Benefits maximisation process is inconsistent</li> <li>• Respite to be made clear that there will be no charge for Carers</li> <li>• Lack of Consultation of Day Centre charge</li> <li>• Assessments does not capture if a person has had a gender reassignment</li> <li>• SDS is not fully embedded in services assessments</li> <li>• Service users who pay titheing towards a religion/belief, this expense should be considered within a financial assessment</li> <li>• ILF service users should be exempt, but is then unfair on those who don't receive it</li> <li>• It is not clear within the charging policy that those diagnosed with a terminal illness will not get charged for using the day centre.</li> <li>• Those who attend day centre for less than a day , should they receive a lesser charge.</li> <li>• Disability related expenditure to be added as an exclusion as per COSLA guidance</li> <li>• Age thresholds within charging policy for income</li> <li>• Partner refusing to divulge income, what happens in this scenario?</li> <li>• Consider whether community alarms should not be charged for as they are part of disability related expenditure</li> <li>• Ensure all of the equality characteristics are mandatory questions in the single assessments.</li> </ul> |

| Measure to address these                                                                                                                                                                                                                   | Review action plan and negative impacts which wont be addressed. |                                                                                                                                                                                                                                                                                                                                                                                                         |                 |
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| <b>Section 3: Involvement and Consultation</b><br>Include involvement and consultation relevant to this PFD, including what has already been done and what is required to be done, how this will be taken and results of the consultation. |                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                         |                 |
| Please outline details of any involvement or consultation, including dates carried out, protected characteristics. Also, include involvement or consultation to be carried out as part of the developing and implementing the policy.      |                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                         |                 |
| Details of consultations                                                                                                                                                                                                                   | Dates                                                            | Findings                                                                                                                                                                                                                                                                                                                                                                                                | Characteristics |
| Meeting between Lynne McKnight (IOM - Care at Home ), Richard Heard (Service Manager) and Jane Gray (Service Manager)                                                                                                                      | 29/06/20                                                         | <p>This policy and procedure adheres to legislative requirements, protecting the reputation of West Dunbartonshire HSCP, and responding to COSLA Protocols and best practice.</p> <p>Percentage of clients who are nil charge compared to full charge or contributing shown as a breakdown by race. This data may be skewed due to the number of clients where their race is not known or recorded.</p> | Race            |
| Reviewed by senior social worker David Buchan for the Addictions service                                                                                                                                                                   | 03/07/2020                                                       | No impact                                                                                                                                                                                                                                                                                                                                                                                               |                 |
| Berny Smith, IOM Residential and Day Services and Hazel Kelly IOM, COPT                                                                                                                                                                    | 23/06/2020                                                       | No Impact                                                                                                                                                                                                                                                                                                                                                                                               |                 |
| Meeting between Hazel Kelly (Interim IOM COPT), Caroline Thomson (SSW COPT) and Sean Taylor (SSW COPT)                                                                                                                                     | 15/06/2020                                                       | No Impact                                                                                                                                                                                                                                                                                                                                                                                               |                 |

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| Laura Evans                                                                                                           | 16/07/2020 | People from Black minority ethnic groups are more likely to be income deprived than white groups.                                                                                                                                      |                     |
| Meeting between Lynne McKnight (IOM - Care at Home ), Richard Heard (Service Manager) and Jane Gray (Service Manager) | 29/06/20   | This policy and procedure adheres to legislative requirements, protecting the reputation of West Dunbartonshire Council, and responding to COSLA Protocols and best practice.                                                          | Sex                 |
| Reviewed by senior social worker David Buchan for the Addictions service                                              | 03/07/2020 | No impact                                                                                                                                                                                                                              |                     |
| Berny Smith, IOM Residential and Day Services and Hazel Kelly IOM, COPT                                               | 23/06/2020 | No impact                                                                                                                                                                                                                              |                     |
| Meeting between Hazel Kelly (Interim IOM COPT), Caroline Thomson (SSW COPT) and Sean Taylor (SSW COPT)                | 15/06/2020 | No Impact                                                                                                                                                                                                                              |                     |
| Laura Evans                                                                                                           | 16/07/2020 | Women are more likely to be income deprived than men (e.g. 80% plus of single parents are women)                                                                                                                                       |                     |
| Meeting between Lynne McKnight (IOM - Care at Home ), Richard Heard (Service Manager) and Jane Gray (Service Manager) | 29/06/2020 | This policy and procedure adheres to legislative requirements, protecting the reputation of West Dunbartonshire HSCP, and responding to COSLA Protocols and best practice. There currently is not any data available to determine this | Gender Reassignment |
| Reviewed by senior social                                                                                             | 03/07/2020 | No impact                                                                                                                                                                                                                              |                     |

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| <p>worker David Buchan for the Addictions service</p> <p>Berny Smith, IOM Residential and Day Services and Hazel Kelly IOM, COPT</p> <p>Meeting between Hazel Kelly (Interim IOM COPT), Caroline Thomson (SSW COPT) and Sean Taylor (SSW COPT)</p>                                                                                                                                               | <p>23/06/2020</p> <p>15/06/2020</p>                                   | <p>No impact</p> <p>No Impact</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                   |
| <p>Meeting between Lynne McKnight (IOM - Care at Home ), Richard Heard (Service Manager) and Jane Gray (Service Manager)</p> <p>Reviewed by senior social worker David Buchan for the Addictions service</p> <p>Berny Smith, IOM Residential and Day Services and Hazel Kelly IOM, COPT</p> <p>Learning Disability (Lorraine David Service Manager and Robert MacFarlane(Operations Manager)</p> | <p>29/06/20</p> <p>03/07/2020</p> <p>23/06/2020</p> <p>25/06/2020</p> | <p>This policy and procedure adheres to legislative requirements, protecting the reputation of West Dunbartonshire HSCP , and responding to COSLA Protocols and best practice</p> <p>No impact</p> <p>No Impact</p> <p>Lack of formal or informal consultation with stakeholders before the implementation of charges.</p> <p>Due to a lack of Equality Impact Assessment being completed before the implementation of charges, this potentially created avoidable organisational risk in terms of the legal expectations of this work-taking</p> | <p>Disability</p> |

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|  | <p>place.<br/>A completed Charging Policy was unavailable for consultation, along with the notified service concerns before the implementation of charges.</p> <p>The policy could be clearer when determining what service users are specifically being charged for, e.g. what is included in the day charge. Therefore, there could be room for misunderstanding and resulting inequitably in application of charge.</p> <p>A significant challenge the policy has is ensuring a fair charge for all client groups, whilst also recognising and respecting the unique differences that may exist across these same client groups.</p> <p><b>The impact on people with disabilities relating to the implementation of charges for the services provided in Learning Disability Day Services.</b></p> <p>Implementing a day charge which includes the provision of a lunch does not acknowledge the key principles of the national Learning Disability Strategy 'Keys to Life'; Self Directed Support; and European Convention on Human Rights (ECHR). Under section 6 of the Human Rights Act (1998), which highlights that, people (including those with learning disabilities) have the right to 'Choice and Control'. This includes the right to determine the food they wish to eat and where they eat it. The Policy also overlooks individual's complex health conditions and related anxieties, which can involve peg feeding (nil by mouth) or specialist dietary requirements provided from home.</p> |  |
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|  |  | <p>The same applies to the inclusion of transport costs within the daily charge. Some individuals, due to the complexities of their disability or by personal choice, cannot or do not wish to use the Centre Transport. By including transport in the charge, this could easily result in an increase in demand for transport and effectively the service then discourages more able individuals from using public transport; and limiting their opportunity in acquiring independence skills.</p> <p>The main concerns raised have been previously documented and include:</p> <ul style="list-style-type: none"><li>• A subsequent negative impact on individual choice and control for people with disabilities.</li><li>• The potentially unfair implementation which could require people to pay for transport they do not use or meals they do not take, either due to choice, personal circumstance or disability preventing them from doing so.</li><li>• The use of the £30 per week cap could result in some people paying this for a 5-day service, whilst other people only receiving a 3-day service could pay the same amount.</li><li>• Potential loss of skills that the café experience provided. People previously paid for their lunch, if they choose to have one, at the time of purchase, hence promoting the development of money handling and independent living skills. The policy would remove this opportunity.</li><li>• The Care Inspectorate as being at odds with the principles of the national strategy for</li></ul> |  |
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|  |  | <p>Learning Disabilities, e.g. 'choice, control, and active citizenship', could view the introduction of a broader charge.</p> <ul style="list-style-type: none"> <li>• The introduction of the charge could result in the lowering of the overall cost of the package of support and therefore the service contribution to the care costs. This could easily then have a knock on effect on whether this service contribution is equal to the ILF contribution? If it is lower, then either the ILF contribution needs to be reduced or the service contribution needs to be increased. If people who are utilising ILF are exempt from charges then this could be viewed by the Care Inspectorate as inequitable and ultimately discriminatory to those that are not.</li> </ul> <p>The generic Day Centre charge could be challenged because many individuals attend Dumbarton Centre to partially provide respite to carers and this is reflected in</p> <ul style="list-style-type: none"> <li>• The care plan – therefore charges may need to be waived (50%) in these circumstances due to the Carers Act (2016). However, this would not be applicable if there were separate charges for lunches and transport.</li> <li>• Not everyone attends for a full day. Some individuals may only attend for a couple of hours therefore a daily charge would be unfair.</li> </ul> <p>A day charge hides the elements exempt from charge - personal care, services directly attributable to carers (carers respite), people who are terminally</p> |  |
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| Meeting between Hazel Kelly (Interim IOM COPT), Caroline Thomson (SSW COPT) and Sean Taylor (SSW COPT)                                                                                                                                                                                                                                                                                                             | 15/06/2020                                                                                | ill, adult support and protection.<br><br>No impact                                                                                                                                                                                                                                                                                                                                                                                          |     |
| <p>Meeting between Lynne McKnight (IOM - Care at Home ), Richard Heard (Service Manager) and Jane Gray (Service Manager)</p> <p>Reviewed by senior social worker David Buchan for the Addictions service</p> <p>Children Services (Annie Ritchie and Paul Kyle)</p> <p>Berny Smith, IOM Residential and Day Services and Hazel Kelly IOM, COPT</p> <p>Meeting between Hazel Kelly (Interim IOM COPT), Caroline</p> | <p>29/06/2020</p> <p>03/07/2020</p> <p>24/06/2020</p> <p>23/06/2020</p> <p>15/06/2020</p> | <p>This policy and procedure adheres to legislative requirements, protecting the reputation of West Dunbartonshire HSCP, and responding to COSLA Protocols and best practice.</p> <p>No impact</p> <p>No impact as policy is not applicable to children under the age of 19 years. Impact will require to be considered by adult services at point of transition from child to adult services where this is applicable.</p> <p>No impact</p> | Age |

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| Thomson (SSW COPT) and Sean Taylor (SSW COPT)<br><br>Laura Evans                                                      | 16/07/2020 | No Impact<br><br>Emerging evidence is that under 30's have taken a more severe hit in terms of incomes during the last 4 months                                                                                                                                                                                                                                                                                                                                                                                                                |                  |
| Meeting between Lynne McKnight (IOM - Care at Home ), Richard Heard (Service Manager) and Jane Gray (Service Manager) | 29/06/2020 | This policy and procedure adheres to legislative requirements, protecting the reputation of West Dunbartonshire HSCP, and responding to COSLA Protocols and best practice. This data may be skewed due to the number of clients where their religion/belief is not known or recorded<br>There is some deferential across the breakdown of faith and religion in relation to nil charging. However, as the lowest Nil charge is where religion is not stated it is difficult to determine any actual or potential negative outcomes accurately. | Religion/ Belief |
| Reviewed by senior social worker David Buchan for the Addictions service                                              | 06/07/2020 | No impact                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                  |
| Berny Smith, IOM Residential and Day Services and Hazel Kelly IOM, COPT                                               | 23/06/2020 | No impact                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                  |
| Meeting between Hazel Kelly (Interim IOM COPT), Caroline Thomson (SSW COPT) and Sean Taylor (SSW COPT)                | 15/06/2020 | No Impact                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                  |

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| Meeting between Lynne McKnight (IOM - Care at Home ), Richard Heard (Service Manager) and Jane Gray (Service Manager) | 29/06/2020 | This policy and procedure adheres to legislative requirements, protecting the reputation of West Dunbartonshire HSCP, and responding to COSLA Protocols and best practice. | Sexual Orientation          |
| Reviewed by senior social worker David Buchan for the Addictions service                                              | 06/07/2020 | No impact                                                                                                                                                                  |                             |
| Berny Smith, IOM Residential and Day Services and Hazel Kelly IOM, COPT                                               | 23/06/2020 | No impact                                                                                                                                                                  |                             |
| Meeting between Hazel Kelly (Interim IOM COPT), Caroline Thomson (SSW COPT) and Sean Taylor (SSW COPT)                | 15/06/2020 | No Impact                                                                                                                                                                  |                             |
| Meeting between Lynne McKnight (IOM - Care at Home ), Richard Heard (Service Manager) and Jane Gray (Service Manager) | 29/06/2020 | This policy and procedure adheres to legislative requirements, protecting the reputation of West Dunbartonshire HSCP, and responding to COSLA Protocols and best practice. | Civil Partnership/ Marriage |
| Reviewed by senior social worker David Buchan for the Addictions service                                              | 06/07/2020 | No impact                                                                                                                                                                  |                             |

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| Berny Smith, IOM Residential and Day Services and Hazel Kelly IOM, COPT                                               | 23/06/2020 | No Impact                                                                                                                                                                  |                      |
| Meeting between Hazel Kelly (Interim IOM COPT), Caroline Thomson (SSW COPT) and Sean Taylor (SSW COPT)                | 15/06/2020 | No Impact                                                                                                                                                                  |                      |
| Meeting between Lynne McKnight (IOM - Care at Home ), Richard Heard (Service Manager) and Jane Gray (Service Manager) | 29/06/2020 | This policy and procedure adheres to legislative requirements, protecting the reputation of West Dunbartonshire HSCP, and responding to COSLA Protocols and best practice. | Pregnancy/ Maternity |
| Reviewed by senior social worker David Buchan for the Addictions service                                              | 06/07/2020 | No impact                                                                                                                                                                  |                      |
| Berny Smith, IOM Residential and Day Services and Hazel Kelly IOM, COPT                                               | 23/06/2020 | No Impact                                                                                                                                                                  |                      |
| Meeting between Hazel Kelly (Interim IOM COPT), Caroline Thomson (SSW COPT) and Sean Taylor (SSW COPT)                | No Impact  |                                                                                                                                                                            |                      |
| SDS Ideas                                                                                                             | 30/06/2020 | Financial assessments are not always completed<br>Maximisation of benefits is inconsistent                                                                                 | Other                |

| Carers WD                                                   | 30/06/2020                                                                                                                                                                            | Respite definition and clarity that a carer will not get charged when getting a carer is getting respite                                                                                                                                                                                      |                                  |
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| <b>Section 4: Analysis of positive and Negative Impacts</b> |                                                                                                                                                                                       |                                                                                                                                                                                                                                                                                               |                                  |
| <b>Protected Characteristic</b>                             | <b>Positive Impact</b>                                                                                                                                                                | <b>Negative Impact</b>                                                                                                                                                                                                                                                                        | <b>No impact</b>                 |
| <b>Race</b>                                                 | Yes, consistent with human rights principles (Addictions service)<br><br>Maximisation of benefits (Residential and Adult day services)                                                |                                                                                                                                                                                                                                                                                               | Care at Home service<br><br>COPT |
| <b>Sex</b>                                                  | Yes, consistent with human rights principles (Addictions service)<br><br>Maximisation of benefits (Residential and Adult day services)                                                |                                                                                                                                                                                                                                                                                               | Care at Home service<br><br>COPT |
| <b>Gender Re-assignment</b>                                 | Maximisation of benefits (Residential and Adult day services)                                                                                                                         |                                                                                                                                                                                                                                                                                               | Care at Home service<br><br>COPT |
| <b>Disability</b>                                           | Maximises income (Care at Home service)<br><br>Yes, consistent with human rights principles (Addictions service)<br><br>Maximisation of benefits (Residential and Adult day services) | Availability of services and funding varies dependant on disability(Care at home)<br><br>Availability of services and funding varies dependant on disability. No equity of spend(COPT)<br><br>Expenses for those who have multiple profound complex needs, needs to be considered (Carers WD) |                                  |

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|     |                                                                                                                                                                                                                                                                                                  | <p>Disability related expenditure (SDS Ideas)</p> <p>Community alarms should not be charged for those with a disability (SDS ideas)</p> <p>Lack of services, there is a requirement for more resources and choices to be offered to individuals, due to self-directed support and funding/benefits can vary dependant on disability. Charging someone for a full service they may not be able to fully access (Residential and Adult day services)</p> <p>Those who don't receive a ILF will get charged.</p> |                                                                                                                                                        |
| Age | <p>Maximises income(COPT)<br/>Maximises income(Care at Home)</p> <p>Yes, consistent with human rights principles (Addictions service)</p> <p>Maximisation of benefits. Will offer more opportunities, choices and resources for individuals of all ages (Residential and Adult Day Services)</p> | <p>Availability of services and funding varies dependant on age (Care at home)</p> <p>Minimum income thresholds is based on age (SDS ideas)</p> <p>Currently services and resources are limited to some</p>                                                                                                                                                                                                                                                                                                   | <p>No impact as policy is not applicable to children under the age of 19 years. Impact will require to be considered by adult services at point of</p> |

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|                         |                                                                                                                                               | <p>community groups and funding varies dependant on age (Residential and Adult Day Services)</p> <p>Availability of services and funding varies dependant on age. No equity of spend(COPT)</p>                                                                                                                                                                                                                                                                                                                                     | <p>transition from child to adult services where this is applicable. (Children Services)</p> |
| <p>Religion/ Belief</p> | <p>Yes, consistent with human rights principles (Addictions service)</p> <p>Maximisation of benefits (Residential and Adult Day Services)</p> | <p>There is some differential across the breakdown of faith and religion in relation to nil charging. However, as the lowest Nil charge is where religion is not stated it is difficult to determine any actual or potential negative outcomes accurately(Care at Home Service)</p> <p>Some individuals may have financial commitments arrangements made with their church, which may need to be considered within the assessment(Residential and Adult Day Services)</p> <p>Issue of Titheing may need to be considered as an</p> |                                                                                              |



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|                                |                                                               | outgoing(COPT)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                    |
| Sexual Orientation             | Maximisation of benefits (Residential and Adult Day Services) |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Care at Home service<br>Addictions Service<br>COPT |
| Civil Partnership/<br>Marriage | Maximisation of benefits (Residential and Adult Day Services) | <p>Partner may not provide access to income however their income is assessed and charge applied against this (Care at Home)</p> <p>Depending on the relationship. This may be of a disadvantage to the person requiring the service as the partner may refuse to divulge their income, resulting in no/limited service being offered or maximum charges being applied(Residential and Adult Day Services)</p> <p>Partner may not provide access to income however, their income is assessed and charge applied against this (COPT)</p> | Addictions Service                                 |
| Socio Economic Status          | Maximisation of benefits (Residential and Adult Day Services) | <p>If income is high individual could be getting maximum charge for practical tasks. Those at lower end of threshold may not be charged equally. (Care at Home)</p> <p>If income is high individual could be getting maximum charge for practical tasks. Those at lower end of threshold may not be</p>                                                                                                                                                                                                                                | Addictions Service                                 |

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|                                                                                                                                              |                                                                                                                                | charged equally i.e. comparison of example 1 +3 on page 20 of charging policy (COPT) |  |
| <b>Section 5: Addressing impacts</b>                                                                                                         |                                                                                                                                |                                                                                      |  |
| Select which of the following apply (use can choose more than one) and give a brief explanation – to be expanded in Section 6: Action Plan   |                                                                                                                                |                                                                                      |  |
| 1. No major change                                                                                                                           |                                                                                                                                |                                                                                      |  |
| 2. Continue the PFD                                                                                                                          | <b>The charging policy will continue, as the equality impact assessment did not bring out any blockers to remove charging.</b> |                                                                                      |  |
| 3. Adjust the PFD                                                                                                                            | <b>There are a few amendments, which will be made, and these will be documented in the action plan.</b>                        |                                                                                      |  |
| 4. Stop and remove the PFD                                                                                                                   |                                                                                                                                |                                                                                      |  |
| Give reasons:                                                                                                                                |                                                                                                                                |                                                                                      |  |
| <i>Note: Section 6 below Action Plan details what changes will be made to the charging policy because of the equality impact assessment.</i> |                                                                                                                                |                                                                                      |  |

| <b>Section 6: Action Plan</b> Please describe any action which will be taken following the assessment in order to;                                                                                                        |                        |                  |                     |        |                          |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------|------------------|---------------------|--------|--------------------------|
| <ul style="list-style-type: none"> <li>• reduce or remove any negative impacts,</li> <li>• promote any positive impacts, or</li> <li>• gather further information or evidence or further consultation required</li> </ul> |                        |                  |                     |        |                          |
| Action                                                                                                                                                                                                                    | Responsible person (s) | Intended outcome | Date for completion | Status | Protected Characteristic |
|                                                                                                                                                                                                                           |                        |                  |                     |        |                          |

|                                                                                  |              | Mandatory field                                                                                                                                          |            |                                                                                                                                                                 | Race                |
|----------------------------------------------------------------------------------|--------------|----------------------------------------------------------------------------------------------------------------------------------------------------------|------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------|
|                                                                                  |              |                                                                                                                                                          |            |                                                                                                                                                                 | Gender              |
| Assessments does not capture if a person has had a gender reassignment           | Laura Evans  | Include in single assessment whether a person has had a gender reassignment, wishes to have one, or would like to be referred to as a different pronoun. | 31/07/2020 | <b>This would be added in the single assessment.</b>                                                                                                            | Gender Reassignment |
| Lack of Consultation of Day Centre charge                                        | Laura Evans  | Ensure service users, employees, and carers decide whether they day centre charge should be split out or not.                                            | 31/07/2020 | <b>It was decided to split out the charge so it includes charge, transport and meals. This was favoured by Argyll and Lomond Advocacy groups and WD carers.</b> | Disability          |
| Disability related expenditure to be added as an exclusion as per COSLA guidance | Laura Evans  | Ensure service users do not need to pay a higher charge if because disability related expenditure was not included.                                      | 17/07/2020 | <b>Completed</b>                                                                                                                                                | Disability          |
| Consider whether                                                                 | Julie Slavin | Consider whether community                                                                                                                               | 31/07/2020 | <b>Closed - This was</b>                                                                                                                                        | Disability          |

|                                                                                                              |              |                                                                                         |            |                                                                                                                                                                                                                                                          |                  |
|--------------------------------------------------------------------------------------------------------------|--------------|-----------------------------------------------------------------------------------------|------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------|
| community alarms should not be charged for as they are part of disability related expenditure                |              | alarms should not be charged for as they are part of disability related expenditure     |            | <b>reviewed with the chief financial officer, and it was determined community alarms is a service and not a expenditure, therefore the fixed charge for community alarms will continue but will be added as an outgoing in the financial assessment.</b> |                  |
| Investigate why there are age thresholds within charging policy for income                                   | Julie Slavin | Reach a decision if there should be age thresholds for income                           | 31/07/2020 | <b>Closed - This is based upon the COSLA guidance and DWP rates of benefit and the older people benefit</b>                                                                                                                                              | Age              |
| Consider if service users who pay money towards a religion/belief, whether this expense should be considered | Julie Slavin | Reach a decision if money paid towards a religion/belief should be added as an expense. | 31/07/2020 | It was decided this would not be an expense.                                                                                                                                                                                                             | Religion/ Belief |

|                                                                                              |               |                                                                                                                                                            |            |                                                |                          |
|----------------------------------------------------------------------------------------------|---------------|------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|------------------------------------------------|--------------------------|
| within a financial assessment                                                                |               |                                                                                                                                                            |            |                                                |                          |
|                                                                                              |               |                                                                                                                                                            |            |                                                | Sexual Orientation       |
|                                                                                              |               |                                                                                                                                                            |            |                                                | Pregnancy/ Maternity     |
| Initiate a separate project to review the financial assessments process across HSCP          | Laura Evans   | Ensure financial assessments across HSCP are consistent and fair to service users.                                                                         | 2020/2021  | Completed                                      | Other e.g. cross cutting |
| Ensure all of the equality characteristics are mandatory questions in the single assessments | Laura Evans   | Ensure all characteristics are covered in the assessment by making them mandatory questions so data can be taken to ensure the service is provided fairly. | 31/07/2020 | This is covered in the new my life assessment. | Other e.g. cross cutting |
| Benefits maximisation is inconsistent                                                        | Jacque Carson | This will be reviewed as part of the SDS single assessment process                                                                                         | 2020/2021  | Completed                                      | Other e.g. cross cutting |
| Update definition of Respite and short breaks                                                | Laura Evans   | Ensure that it is clear for Carers that if they are having respite or                                                                                      | 31/07/2020 | Completed                                      | Other e.g. cross cutting |

|                                                                                                                                                                                |               |                                                                                                           |            |                                 |                          |
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| within the charging policy so it is clear that a Carer wont get charged if they are having respite or having a short break.                                                    |               | on a shortbreaks a Carer wont get charged.                                                                |            |                                 |                          |
| Initiate a project which embeds SDS into HSCP services.                                                                                                                        | Jacque Carson | Ensure service users are giving the choice, control and active citizenship for the services they receive. | 2020/2021  | Completed                       | Other e.g. cross cutting |
| Ensure it is clear within the charging policy that those who are diagnosed with a terminal illness that they would not get charged for using the day centre or for any service | Laura Evans   | There would be no charge given to those who are diagnosed with a terminal illness                         | 31/07/2020 | Completed                       | Other e.g. cross cutting |
| A review is required to find out if there should be a                                                                                                                          | Laura Evans   | A review is required to find out if there should be a lesser                                              | 31/07/2020 | The charge will be per session. | Other e.g. cross cutting |

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                                                                                                                                                               |                                                                |  |  |  |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------|--|--|--|
| lesser charge for those who only attend the day centre for half a day                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                                               | charge for those who only attend the day centre for half a day |  |  |  |
| <p><b>Are there any negative impacts, which cannot be reduced or removed?</b></p> <ul style="list-style-type: none"> <li>• Those without an ILF will get charged for services.</li> <li>• Those with a higher income will receive a higher charge against those who have a lower income.</li> <li>• Availability of services and income depends on the nature of the disability</li> <li>• If a partner refuses to divulge income and there is a concern there is a domestic abuse case then the social worker will deal with this scenario at the time. If a partner refuses to divulge details and there isn't a concern of domestic abuse then the full charge will be applied.</li> </ul> |                                                                                                                                                                                                                                                                               |                                                                |  |  |  |
| <p><b>Section 7: Monitoring and review</b><br/>Please detail the arrangements for review and monitoring of the policy</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                                                                                                                                               |                                                                |  |  |  |
| How will the PFD be monitored? What equalities monitoring will be put in place?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | The agreed actions will be captured as part of the project boards and project plans for the charging policy, financial assessments and embedding SDS. Actions required to be closed before the charging policy goes to IJB in September will be completed before this occurs. |                                                                |  |  |  |
| When will the PFD be reviewed?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | <p>The actions required to be closed before the charging policy is approved will be reviewed and updated weekly.</p> <p>The remaining actions out width this project will be reviewed in the other project boards.</p>                                                        |                                                                |  |  |  |
| Is there any procurement involved in this PFD? Yes/No                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | No                                                                                                                                                                                                                                                                            |                                                                |  |  |  |

| <b>Section 8: Signatures</b>                                                                                        |                                 |                  |
|---------------------------------------------------------------------------------------------------------------------|---------------------------------|------------------|
| The following signatures are required:                                                                              |                                 |                  |
| Lead/ Responsible Officer:                                                                                          | Signature: Julie Slavin         | Date: 18/11/2021 |
| EQIA/EIA Trained Officer:                                                                                           | Signature: Margaret-Jane Cardno | Date: 17/11/2021 |
| <b>Board Reporting:</b><br>complete relevant paragraph on board report and provide further information as necessary | Signature:                      | Date:            |

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