

| | | | | |
|---|--|------------------------------|-----------------------|--|
| Assessment No | 1397 | Owner | Laura Evans | |
| Resource | Health Social Care Partnership (HSCP) | Service/Establishment | Joint | |
| Name | Julie Slavin | Job title | Chief Finance Officer | |
| Head Officer | Julie Slavin | | | |
| Members | Julie Slavin – Chief Financial Officer Sylvia Chatfield – Head of Service-Learning Disability, Addictions and Mental health Fiona Taylor - Head of Health and Community Care Laurence Slavin, Finance Chief Officer | | | |
| Policy Title | Charging Policy Changes 2026/2027 | | | |
| The aim, objective, purpose and intended outcome of policy | <p>The purpose of the Councils charging policy is to set out the legislative background to charges for non-residential social care services and describes the services for which charges may apply. This charging policy complies with the COSLA (Convention of Scottish Local Authorities) National Strategy and Guidance on Charges Applying to Non-Residential Social Care Services¹ and includes local discretion where appropriate and the Social Work (Scotland) Act 1968 Section 872, which sets out the powers local authorities, can use to charge for a range of non-residential services.</p> <p>Consider whether the following changes should be implemented or not.</p> <ol style="list-style-type: none"> I. Moving to a more streamlined desktop financial assessment. This means service users and their partners will not be asked to supply details of benefits and capital, as HSCP will have access to this detail via DWP and Social Security Scotland. The team will also be able to provide leaflets to the service user and partner about benefits which they could see if they are eligible to apply for. II. Endorse the use of Direct Debit as the preferred method to pay invoices for charges levied. III. Approve the introduction of a £50 fixed charge for the supply and installation of key safes, reflecting the full cost of delivering the service based on recent activity. Council is further asked to note the potential risks associated with individuals choosing not to proceed with a key safe where a charge applies, and to request that the HSCP monitors uptake and impact following implementation and reports back as required. It is estimated to be around 700 installations per year. IV. Increase the fixed charge for non-statutory service Older People Day service (on average 50 service users) by more than the standard 5% already approved as part of the Council's 2026/2027 Revenue Budget. V. Increase the fixed charge for non-statutory service-Learning Disability Day service (on average 25 service users) by more than the standard 5% already approved as part of the Council's 2026/2027 Revenue Budget. VI. Increase the fixed charge for non-statutory service Community Alarms (on average 1500 service users) more than the standard 5% already approved as part of the Council's 2026/2027 Revenue Budget. | | | |
| Service/Partners/Stakeholders/service users involved in the Development and/or implementation of policy. | <p>Internal Stakeholders</p> Julie Slavin – Chief Financial Officer Cheryl Taylor – Self Direct Support Manager Sylvia Chatfield – Head of Service-Learning Disability, Addictions and Mental health Fiona Taylor - Head of Health and Community Care Ailsa King – Equalities Lead and Health Improvement Officer Karyn Wood – Head of HSCP Human Resources Margaret-Jane Cardno – Head of Strategy and Transformation Jennifer Ogilvie – HSCP Finance Manager | | | |

¹ https://www.cosla.gov.uk/__data/assets/pdf_file/0016/17521/2020-21-COSLA-Charging-Policy-for-Social-Care-Support.pdf

² Social Work (Scotland) Act 1968 Section 87

| | |
|--|--|
| | Laurence Slavin, Finance Chief Officer |
|--|--|

| | |
|---|-----|
| Do the proposals involve the procurement of any Goods or services? | No |
| If yes, please confirm that you have contacted us. procurement services to discuss your requirements. | No |
| SCREENING | |
| <i>You must indicate if there is any relevance to the four areas</i> | |
| Duty to eliminate discrimination (E), advance equal. opportunities (A) or foster good relations (F) | Yes |
| Relevance to Human Rights (HR) | Yes |
| Relevance to Health Impacts (H) | Yes |
| Relevance to Social Economic Impacts (SE) | Yes |
| Who will be affected by this policy? | |
| All citizens of West Dunbartonshire could be prospective users of HSCP service, and current users of HSCP service will be affected by this policy. | |
| Who will be/have been involved in the consultation process? | |
| <p>Internal Stakeholders Julie Slavin – Chief Financial Officer Cheryl Taylor – Self Direct Support Manager Sylvia Chatfield – Head of Service-Learning Disability, Addictions and Mental health Fiona Taylor - Head of Health and Community Care Ailsa King – Equalities Lead and Health Improvement Officer Karyn Wood – Head of HSCP Human Resources Margaret-Jane Cardno – Head of Strategy and Transformation Jennifer Ogilvie – HSCP Finance Manager Laurence Slavin, Finance Chief Officer</p> | |

Please outline any need/barriers which equality groups may have in
Relation to this policy list evidence you are using to support this and whether there is any negative impact on groups.

| Protected Characteristic | Needs | Evidence | Impact |
|--------------------------|---|---|--|
| Age | <p>There is a clear relationship between long-term health conditions or disability and increasing age. In 2023/24, just over three quarters of people receiving social care services/support were aged 65 years or over (13.9% aged 65-74 years, 29.0% aged 75-84 years and 32.5% aged 85 & over). The remaining quarter were aged 18-64 years (22.5%) with only 2.0% aged 0-17 years. This is a similar age split to 2022/23.</p> <p>The ageing population nationally and within West Dunbartonshire means that there will be expected increase in demand for HSCP services.</p> | <p>The Adult Strategic Needs assessment http://www.wdhscp.org.uk/media/3037/strategic-needs-assessment-2025.pdf</p> <p>https://www.gov.scot/binaries/content/documents/govscot/publications/research-and-analysis/2022/06/national-care-service-adult-social-care-scotland-equality-evidence-review/documents/adult-social-care-scotland-equality-evidence-review/adult-social-care-scotland-equality-evidence-review/govscot%3Adocument/adult-social-care-scotland-equality-evidence-review.pdf</p> | <p>Service Users Negative</p> <p style="text-align: right;">Appendix 2</p> <ul style="list-style-type: none"> • A service user may cancel the service if they cannot afford it. • If there are many service users who do not pay for the service. • Whilst older people, over 60s and those over state pension age accessing these services may be entitled to benefits to help pay for these supports there is evidence that stigma, complexity and lack of awareness means that they may not have claimed or be reluctant to have their income maximised. <p>Service Users Positive</p> <ul style="list-style-type: none"> • Older people may choose more locally based personalized social care support in line with self-directed support principles which might meet their needs better <p>Council negative impact</p> <p>The day services provide support against social isolation and provide independence. If there is no alternative for these service users to combat isolation, this could lead to further statutory services being provided, therefore increasing the service user's package. Moreover, this could lead to a service user going into hospital or taking long-term care in a residential care home.</p> <p>Older people are particularly affected by cumulative costs, including Community Alarm, telecare, key safes, and day care. This is compounded by assessed charges for community support that no longer includes practical tasks, meaning some service users are paying privately for cleaning and shopping, which is not reflected in financial assessments. Many older people do not receive disability benefits and therefore may not qualify for disability-related expenditure discounts.</p> |
| Disability | <p>In 2019 29% of West Dunbartonshire adults had a limiting long-term physical or mental health Condition. Learning disability rates are above the Scottish Average. Individuals with learning disabilities have some of the poorest health outcomes of any group in Scotland. A sizable proportion of the current service users would be classified as having a disability.</p> | <p>http://www.wdhscp.org.uk/media/3037/strategic-needs-assessment-2025.pdf</p> | <p>Service Users Negative</p> <ul style="list-style-type: none"> • A service user may cancel the service if they cannot afford it. • If there is many service users who do not pay for the service, the service may need to close, which would result in staff becoming displaced. |
| Gender reassignments | <p>There is no national data about gender reassignment and people who access social care. However, given the prevalence of social care needs in the population and across the life course, it is likely that some trans people will</p> | <p>The adult Strategic needs assessment http://www.wdhscp.org.uk/media/3037/strategic-needs-assessment-2025.pdf</p> | <p>Positive and negative impact - included in cross-cutting section.</p> |

| | | | |
|---------------------------------------|--|--|--|
| | require social care support. | | |
| Marriage and Civil Partnership | | Evidence of relationship status can be found on the My Life Assessment | Positive and negative impact - included in cross-cutting section. |
| Pregnancy and Maternity | There is no national data about pregnancy and maternity and social care. However, there is a substantial cohort of women of child-bearing age who are receiving social care, and many of this group are likely to experience pregnancy and maternity. There are 22,710 women aged 18-64 receiving social care in Scotland. Within the general population, there are around fifty live births per 1,000 women of childbearing age in Scotland. | Evidence of status can be found on the My Life Assessment | Positive and negative impact - included in cross-cutting section. |
| Race | Research by the ALLIANCE and Self-Directed Support Scotland (SDSS), which explored people's experience of Self-directed Support and social care in Scotland, highlighted barriers to support for Black and minority ethnic people, including access to information and advice; and cultural awareness and understanding. This was particularly the case for Black and minority ethnic women, and the report suggests that this could be associated with women having less fluency in English in home communities. 685.5 per 1000 people are receiving social care services are white. | https://www.gov.scot/publications/race-equality-framework-scotland-2016-2030/documents/ Evidence of race can be found on the My Life Assessment | Positive and negative impact - included in cross-cutting section. |
| Religion and Belief | There is no national data on religion or belief for people who access social care, although NRS analysis of population data suggests that Scotland is becoming more ethnically and religiously diverse. | Evidence of religion/belief can be found on the My Life Assessment | Positive and negative impact - included in cross-cutting section. |
| Sex | Life expectancy is lower than the Scottish average for both men and Women within WDC. Research by the ALLIANCE and Self-Directed Support Scotland (SDSS), which explored people's experience of Self-directed Support and social care in Scotland. found some variation in men and women's experiences. For participants in this study, women had received less information about Self-directed Support options and budgets than men, and were less content with the quality of information that they received | Evidence of sex can be found on the My Life Assessment The adult Strategic needs assessment - http://www.wdhsdp.org.uk/media/3037/strategic-needs-assessment-2025.pdf | |

| | | | |
|-----------------------------------|---|--|---|
| | In 2023/24, the rate of females receiving social care was over one and half times that of males with on average 605 out every 1000 individuals receiving support being female. | | |
| Sexual Orientation | LGBTQI+ identities are associated with poorer health and wellbeing. | The adult Strategic needs assessment - http://www.wdhsc.org.uk/media/3037/strategic-needs-assessment-2025.pdf | Positive and negative impact - included in cross-cutting section. |
| Human Rights | Right to equality Fairness Respect Equality Dignity Autonomy The right to respect for private and family life, dignity and autonomy protected by the HRA (Article 8 of the European Convention on Human Rights) and by Article 19 of the Convention on the Rights of Persons with Disabilities | Human Rights Act | Positive and negative impact - included in cross-cutting section. |
| Health | The longstanding impacts of poverty, poor employment and multiple deprivation has led to a less healthy population in West Dunbartonshire. | The adult Strategic needs assessment - http://www.wdhsc.org.uk/media/3037/strategic-needs-assessment-2025.pdf | Positive and negative impact - included in cross-cutting section. |
| Social and Economic Impact | Perception of increased self-funding expectations There is a concern that the current approach signals a shift toward expecting service users to use benefits and self-fund services, without sufficient recognition of cumulative financial pressures There is understanding disabled people face higher costs due to their disability and increased charges could force them into further poverty. | The adult Strategic needs assessment - http://www.wdhsc.org.uk/media/3037/strategic-needs-assessment-2025.pdf | Positive and negative impact - included in cross-cutting section. |
| Cross Cutting | Impacts on all protected characteristics and external impacts. In 2023/24, of those people receiving social care services or support, just over 65% had a social worker (153,760). This is an increase of 5 percentage points from 2022/23. Forty-nine per | The adult Strategic needs assessment - http://www.wdhsc.org.uk/media/3037/strategic-needs-assessment-2025.pdf | Service User - Positive impact <ul style="list-style-type: none"> Personal care is a free service within Scotland. Personal care will continue to be provided and be free to all ages and to service users who are eligible for the service. |

cent of people had a community alarm and/or telecare (115,370). This was like 2022/23. These are the two largest areas of support.

An estimated 1 in 23 people in Scotland were reported as receiving social care support and/or services at some point during 2023/24

- Moving to a desktop financial assessment. This means service users will not be asked to supply details of benefits and capital, as HSCP will have access to this detail via DWP and Social Security Scotland. This will reduce the anxiety of service users going through a yearly financial assessment. The council will be able to update the financial assessment, if there is no change in service, on a yearly basis. This will reduce any trauma of having to be reminded of any disability, trauma the service users have went through by having to find receipts, bank statements, and award letters from DWP or Social Security Scotland.
- The introduction of a desktop assessment will allow the dedicated team to send leaflets and information for benefits to be maximized.
- Direct debit will be method to pay invoices for charges. Direct debit is a common method for users to pay bills over a period of months. Direct debit is one method but will be the default method going forward. This means service users will receive their yearly bills and will be able to contact the finance Centre for a direct debit to be arranged, so a monthly amount is paid. If a service user does not have a bank, then this can be discussed with the service on how an invoice can be paid.

Service user – Negative Impact

- Direct debit will be method to pay invoices for charges. Direct debit is a common method for users to pay bills over a period of months. There are some services users, especially in Learning Disability service, who prefer a monthly invoice, Receiving a yearly invoice can be upsetting as the number can be large. However, with guidance and explanation from the service, the yearly charge can be paid monthly and would be the same amount as a monthly charge, then this can be mitigated.
- **Charging for key safes may create risks**
Charging for key safes could be problematic, particularly for service users receiving CAH or other provider services. If service users refuse a key safe due to cost, carers may be unable to gain access, leading to increased “no entry” incidents, safeguarding concerns, and potential escalation to family members or emergency services. Lack of a key safe could also delay responses in genuine emergencies.
- Increased cost on Digital Community Alarms service. The community alarm service is a non-statutory service. There is a risk that service

| | | | |
|--|--|--|---|
| | | | <p>users will not take a community alarm to reduce their risk of entering a residential care home, and prolonging their time in their own home, due to the cost of the alarm.</p> <ul style="list-style-type: none"> • Perception of increased self-funding expectations There is a concern that the current approach signals a shift toward expecting service users to use benefits and self-fund services, without sufficient recognition of cumulative financial pressures |
|--|--|--|---|

| Issue Description | Action Description | Actioner Name | Due Date |
|---|---|----------------------------------|------------------------------------|
| If a service user is unable to pay for any non-statutory service, then they can send a complaint to HSCP for the Head of service to review if the charge should be removed, | Head of service consider charges on a case-by-case basis, if a service user submits a complaint based on a charge | Sylvia Chatfield Fiona Taylor | 1 st April 2026 |
| Ensure communication of moving to a yearly annual bill for Learning Disability service users is communicated clearly | Created clear communication | Sylvia Chatfield | 1 st April 2026 |
| Promote income maximisation and uptake of all benefits particularly non means tested disability benefits including Pension age disability payment | Promote income maximisation and opportunities for financial review. Approximately 26000 in West Dunbarton receive pension age disability payment. | Sylvia Chatfield Fiona Taylor | 1 st April 2026 |
| Ensure that information on the charging policy including the introduction of direct debit payments is provided in a range of formats including easy read | Create easy read | Laura Evans | Complete – this is updated yearly. |
| Monitor any changes/cancellations to services by protected characteristic in 2026/27 to understand impact of | Monitor any changes/cancellations to services by protected characteristic in 2026/27 to understand impact of | Sylvia Chatfield Fiona Taylor | 31 st December 2026 |

| | | | |
|---------|---------|--|--|
| changes | changes | | |
|---------|---------|--|--|

| |
|---|
| <p>Policy has a negative impact on an equality group but is still to be implemented, please provide justification for this.</p> <p>Whilst changes to non-residential social care charges may have a negative impact on women, older people and those with disabilities, the charges are an important revenue source for the HSCP, to support non-critical services. Service users who use these services may be eligible for financial support and income maximisation including pension age disability payments and can use these benefits to pay for these services.</p> |
| <p>Will the impact of the policy be monitored and reported on an ongoing basis?</p> <p>Yes – the charging policy is reviewed on a yearly basis</p> |
| <p>Q7 What do you recommend for this policy?</p> <p>Implement the changes detailed in the aims section.</p> |
| <p>Please provide a meaningful summary of how you have reached the</p> <p>Reviewing the feedback from staff.</p> |