

A photograph of a fountain with a central vertical jet and several arched jets, set against a stone wall. The water is illuminated, creating a bright, shimmering effect. The fountain is located in front of a building with a stone facade and an arched window on the right side.

Adult Social Care Charging Policy Consultation

Consideration of Feedback

December 2023

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Copy of “overall” sections from consultation report for reference

Feedback review process

Response to overall feedback

Feedback review process

The consultation feedback was reviewed over two meetings on 28th Nov 23 and 4th Dec 23, with:

- Paula Johnston, Head of Quality, Governance and Professional Development for Adult Social Care
- Claire Elton, Solicitor
- Clare Bull, Senior Policy and Strategy Officer
- Sandra Littler, Project Manager

Documents reviewed were:

- Consultation Report
- Consultation report in the form of a considerations table to support the discussion
- Copy of individual feedback comments

Response to overall feedback

Overall feedback was captured from the responses to the consultation questions asking about the changes as a whole, and the conversations held during face-to-face engagement meetings. The following trends were identified:

- The quantitative questionnaire responses to the policy overall were mixed, but favourable on balance (see the extracts from the consultation report at the end).
- Individual comments showed that many people were dissatisfied with having to pay for their care at all.
- Many people expressed the view that benefits and allowance rates were too low, and the amount they are left with for day-to-day living expenses is inadequate for a good quality of life. Unfortunately, we are not in a position to alter government policy or the level of benefits and allowances. However, we have a duty to review a person's financial assessment if we believe that a lack of funds is having an adverse effect on their welfare or safety.
- People requested better support with the financial assessment process, particularly face-to-face support. We are already reviewing both staff training and the financial assessment process, to ensure that more support is provided in a range of formats. All parties benefit from having the financial assessment done promptly and accurately so that the correct charges are issued from the outset.
- It was common for comments to indicate a misunderstanding of the proposed changes. Charging is necessarily a complex subject, but we have substantially revised the proposed policy to make it easier to read. We will also be overhauling our other financial information and guidance with the aim of making it simpler and clearer.
- **In general, the feedback will influence the way we implement and communicate the proposed policy changes, but does not suggest that either the proposed policy changes or our equality and safety impact assessment need to be revised.**

Response to feedback on individual proposals

Proposal 1: Improvements to the process of managing people's disability related expenses

- In total, 60% of respondents agreed with proposal 1, with 12% disagreeing.
- 25% of respondents also told us that proposal 1 may have a positive impact, with 13% selecting negative.
- Where concerns were raised in the feedback, the new policy already addresses these. It lays out the typical disability related expenses with typical costs and evidence requirements, while also stating that individual circumstances will still be taken into account.
- Concerns about the time taken to assess claims for disability related expenses are being addressed by improving staff training.
- We are confident that once the disability related expenses are built into the financial assessment (both the online version and the paper form), the process will immediately be clearer.
- We do not propose to amend the proposed policy as a result of this feedback.

Proposal 2: Changes to the way we charge for care which is cancelled

- In total, 75% of respondents agreed with proposal 2, with 7% disagreeing.
- 37% of respondents also told us that proposal 2 may have a positive impact, with 9% selecting negative.
- Narrative feedback showed that people welcome this change.
- There were some unfounded concerns about giving notice in an emergency. The policy already states that this is not expected and people will not be charged for cancelled care under these circumstances.
- We do not propose to amend the proposed policy as a result of this feedback.

Proposal 3: Explaining how charges get going when care starts

- In total, 61% of respondents agreed with proposal 3, with 13% disagreeing.
- 18% of respondents also told us that proposal 3 may have a positive impact, with 16% selecting negative.
- There were some concerns about how long financial assessments have taken. However, the process has improved significantly since we introduced the online financial assessment tool for those that choose to supply their data that way. (A paper form is still available).
- The proposed policy already explains why there may be a delay between the start of care and the first invoice for non-residential care. This is common to all Local Authorities.
- Our implementation plan includes better telephone and face-to-face support for people completing financial assessments, in order to minimise the number of cases where people are charged the full cost “by default”.
- We do not propose to amend the proposed policy as a result of this feedback.

Proposal 4: Charging for non-residential care at the actual cost, instead of an average rate

- In total, 35% of respondents agreed with proposal 4, with 24% disagreeing.
- 7% of respondents also told us that proposal 4 may have a positive impact, with 24% selecting negative.
- Most people receiving non-residential care will not be affected by this proposal, but feedback comments suggest that some people misunderstood this.
- Although a minority of people will see higher charges, nobody will be charged more than they can afford to pay, based on their financial assessment.
- People who are likely to see a significant increase will be informed in advance, and will be reminded that they should let us know of any change in their financial circumstances to ensure that their financial assessment is up to date.
- There was a lot of concern about affordability, the cost of living, and the adequacy of benefit payments. We will continue to assess each person's financial situation on an individual basis, and in particular we will encourage more people to claim disability related expenses wherever possible to ensure they have enough to live on.
- We do not propose to amend the proposed policy as a result of this feedback.

Proposal 5: Introducing charges for transport

- In total, 39% of respondents agreed with proposal 5, with 29% disagreeing.
- 9% of respondents also told us that proposal 5 may have a positive impact, with 29% selecting negative.
- The feedback was similar in nature to proposal 4 above. Again, comments indicate that some people did not realise that only a small number of people would be affected, and that nobody would be charged more than they can afford to pay, based on their financial assessment.
- People who are likely to see a significant increase will be informed in advance, and will be reminded that they should let us know of any change in their financial circumstances to ensure that their financial assessment is up to date.
- We are working with staff to improve the quality and scope of our Care And Support Plans to ensure that all care being provided to meet eligible needs (including transport) is correctly documented. This will ensure that support plans set up the evidence for disability related expenses when they are applicable.
- In addition, we will be reviewing the cost-effectiveness of our transport provision. This was questioned by a number of respondents.
- We do not propose to amend the proposed policy as a result of this feedback.

Proposal 6: Increasing the administration charges for processing deferred payment loans

- In total, 27% of respondents agreed with proposal 6, with 27% disagreeing.
- 7% of respondents also told us that proposal 6 may have a positive impact, with 22% selecting negative.
- There was a lot of concern about administration fees as a concept, despite the fact that only a very small number of people would be affected by this proposal.
- The proposed policy already explains the rare circumstances under which deferred payment loans are offered, and the justification for charging fees to cover the costs we incur.
- Administration fees will only apply to people who have been assessed as able to pay the full cost of their care. In addition, the fees can be added to the loan so do not have to be paid out of the person's weekly income.
- We do not propose to amend the proposed policy as a result of this feedback.

Proposal 7: Changing the minimum income guarantee rate for new customers aged 60 to state pension age

- In total, 39% of respondents agreed with proposal 7, with 23% disagreeing.
- 7% of respondents also told us that proposal 7 may have a positive impact, with 18% selecting negative.
- Concerns were expressed about affordability. We understand these concerns, however we are proposing to work in line with government guidelines on the minimum income guarantee. The proposal brings SCC's policy into line with most other local authorities.
- Contrary to some people's comments, nobody's income will reduce as a result of this proposal because it will only apply to new customers or people who are currently under 60.
- We do not propose to amend the proposed policy as a result of this feedback.

Proposal 8: Improvements to the structure and accessibility of the ASC Charging Policy document

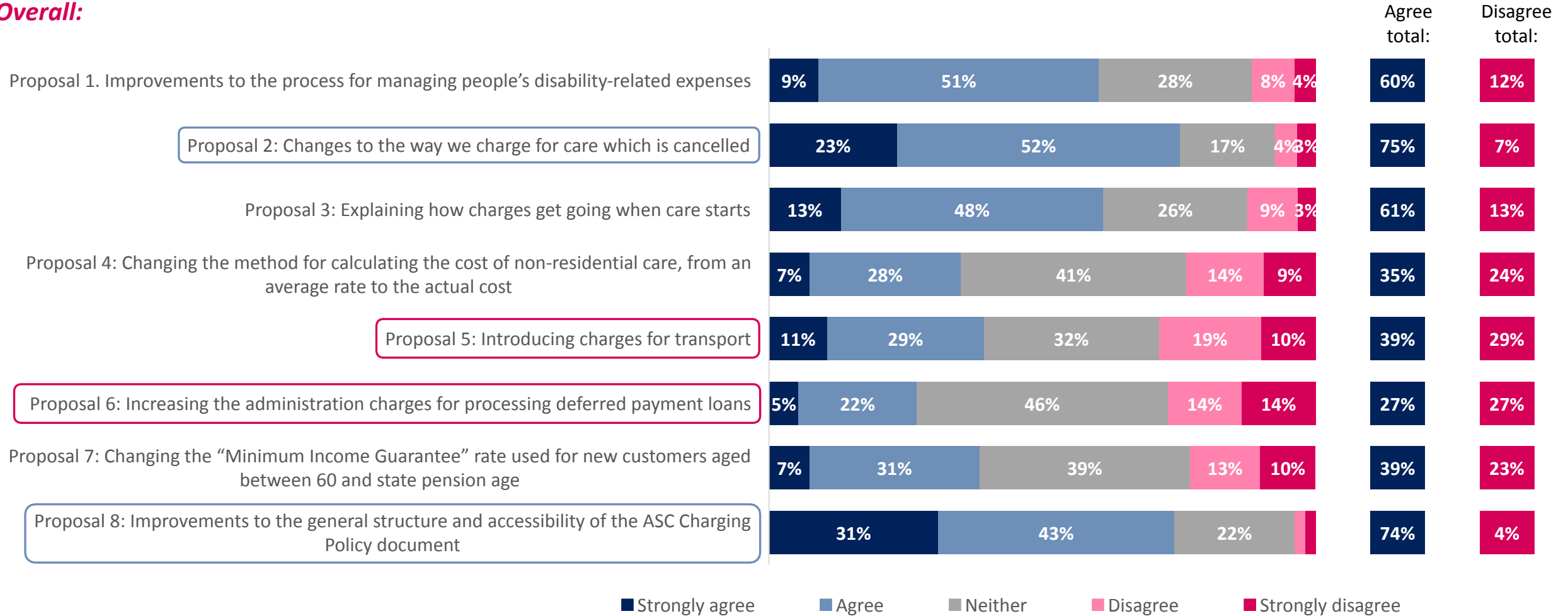
- In total, 74% of respondents agreed with proposal 8, with 4% disagreeing.
- 47% of respondents also told us that proposal 8 may have a positive impact, with 7% selecting negative.
- Feedback was generally positive. People gave useful suggestions on better formats for our information and guidance, and this will be taken into account as we review and overhaul all the guidance.
- The carer voice came across strongly in the feedback. Carers want to understand the charging process better and want access to better quality information. This will be taken into account in our new guidance and we will consult further with carers as the guidance is developed.
- We do not propose to amend the proposed policy as a result of this feedback.

Extracts from Consultation Report

Agreement levels with proposals

Question: To what extent do you agree or disagree with the following proposals?

Overall:



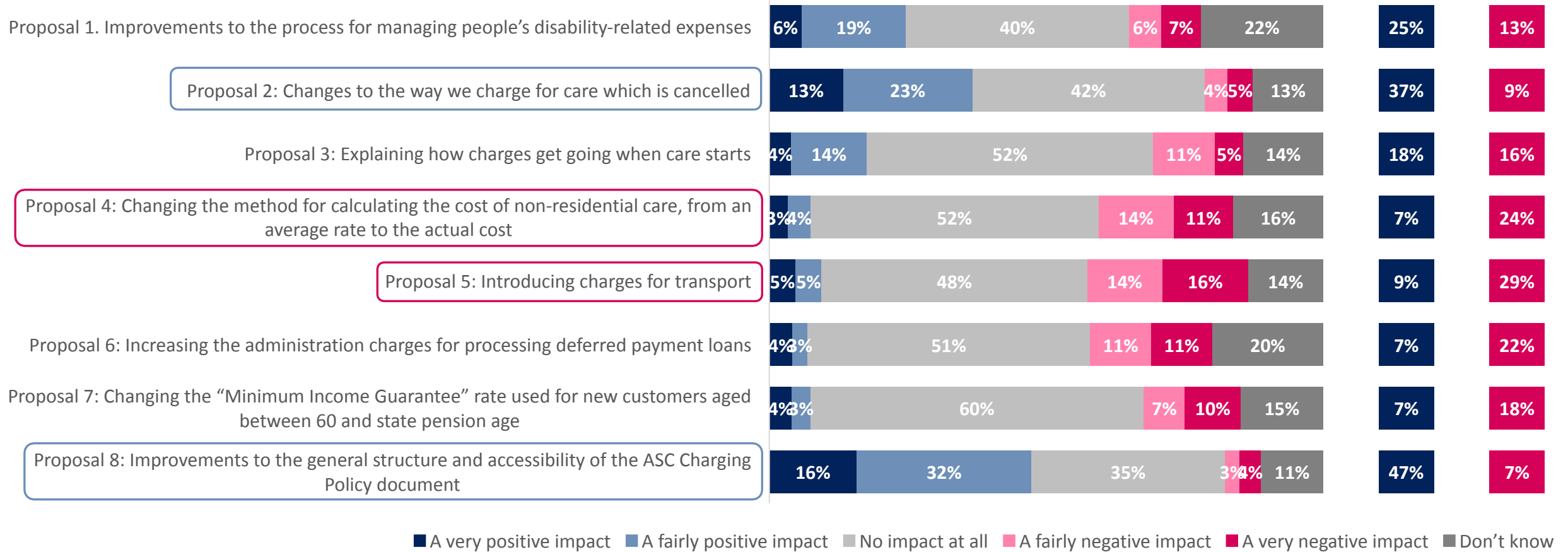
- Proposals with the **highest levels of agreement** was proposal 2 and 8. Proposals with **highest levels of disagreement** was proposal 5 and 6.
- Those who answered as a family, friend or someone who receives care arranged or funded by SCC agreed with the proposals to a similar amount as the average.

Impact of proposals

Question: If these proposals were to go ahead, what impact do you feel it would have on the following?

Overall:

Positive total: Negative total:



- Almost half of respondents (47%) told us that improvements to the general structure and accessibility of the ASC Charging Policy document may have a positive impact.
- Around a quarter of respondents told us that changing the method for calculating the cost of non-residential care (24%) and introducing charges for transport (29%) may have a negative impact.

Overall Draft Policy

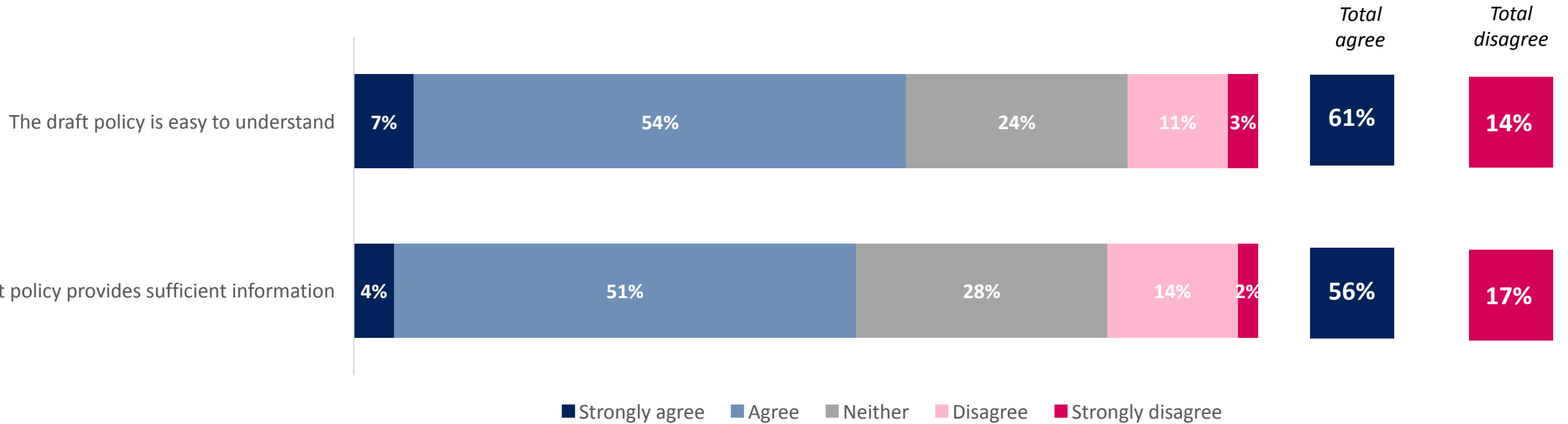
Have you read the proposed draft policy?

25% Yes, all of it

45% Yes, some of it

30% No

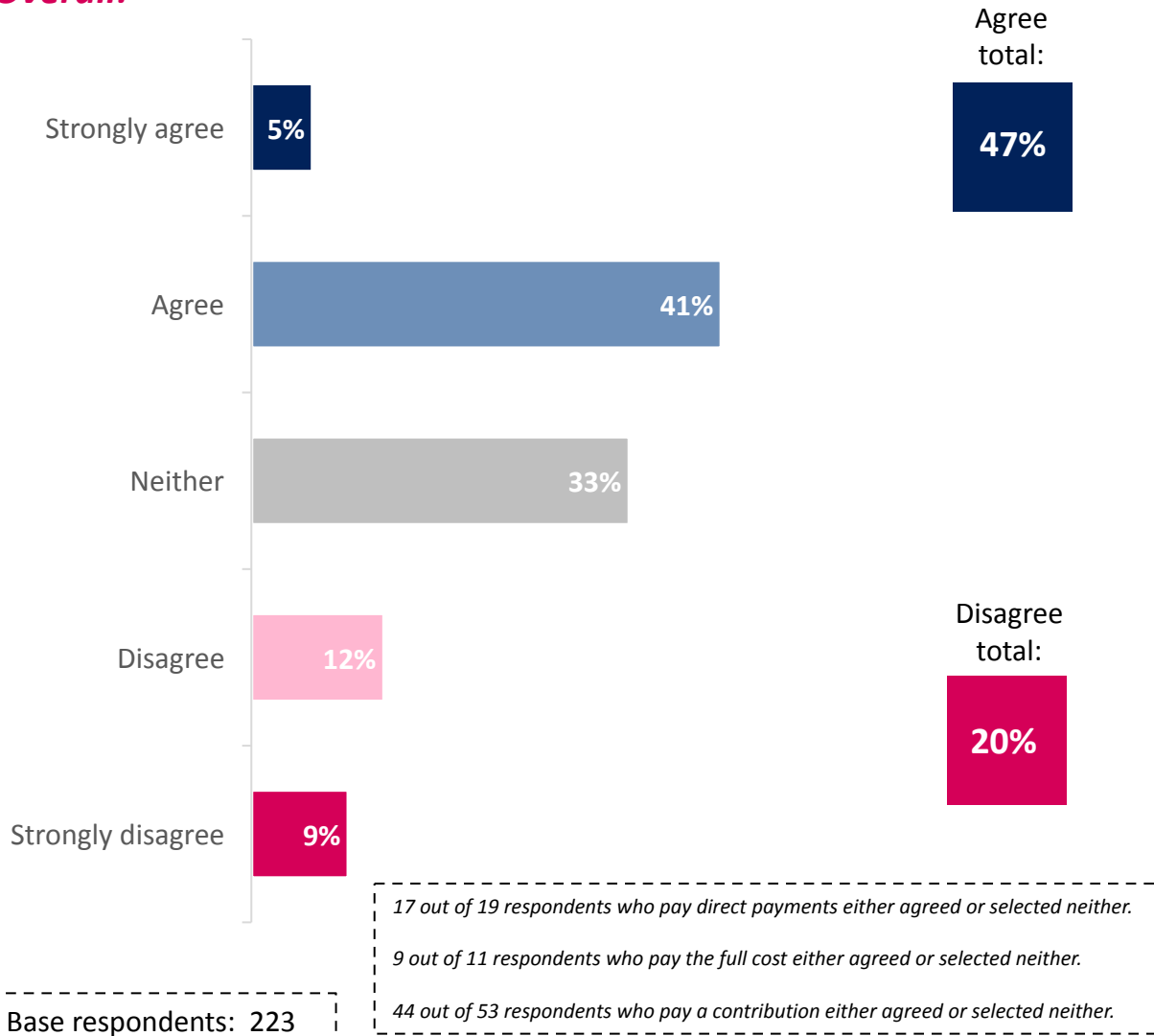
If you have read the proposed policy, to what extent do you agree or disagree with the following statements?



Agreement and impact levels with proposed changes

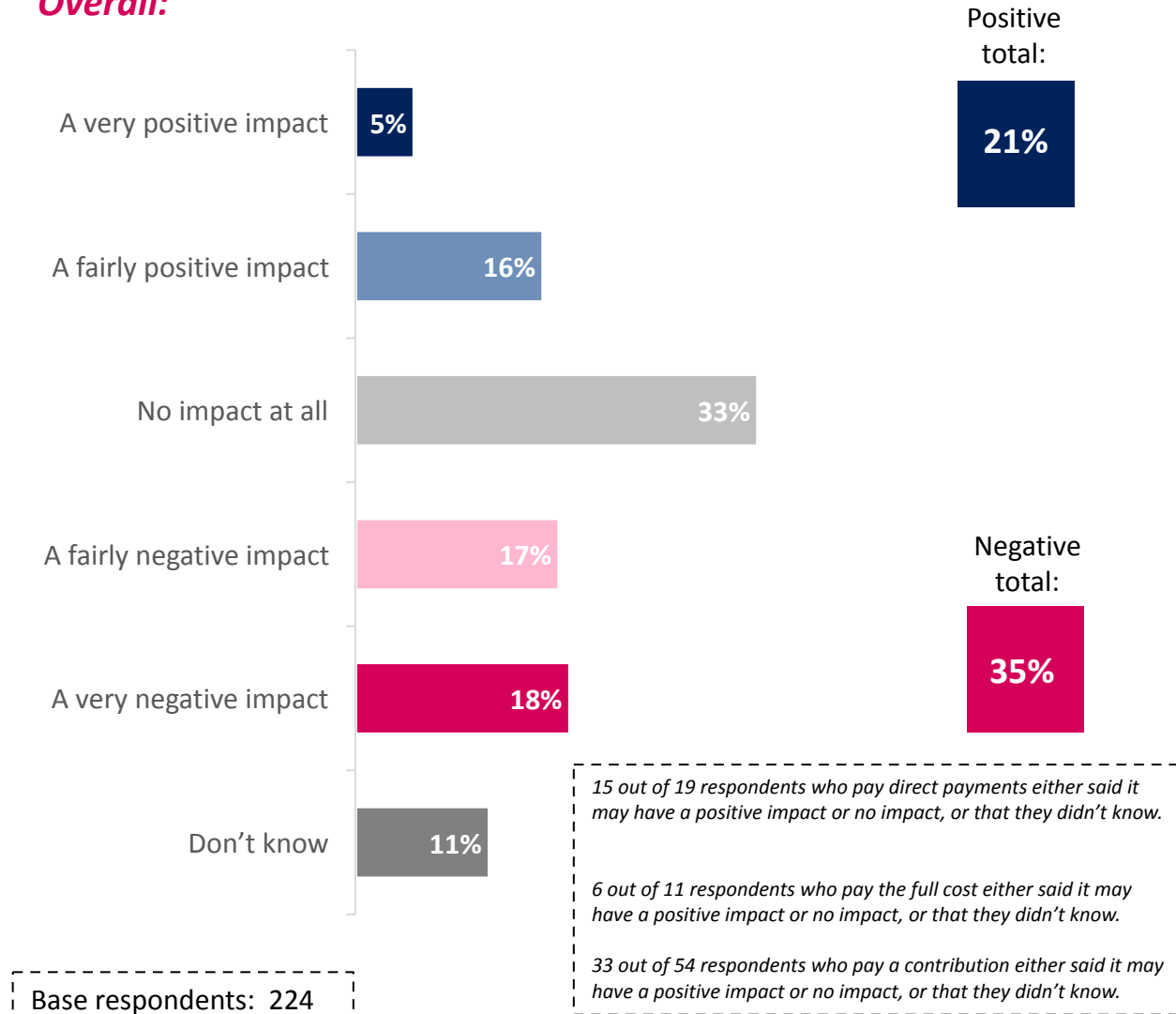
Question: What extent do you agree or disagree with the proposed changes?

Overall:



Question: If the draft policy was to be implemented, what impact do you feel this may have on you or your family?

Overall:



Overall draft policy – Free text responses.

Within the questionnaire, respondents were given the opportunity to provide their own free text comments. Any email or letter responses were also analysed alongside free-text responses in the questionnaire.

The following graphs show the total number of respondents by each theme of comment.

These graphs are in respondent count, rather than percentage.

