

HAMPSHIRE COUNTY COUNCIL

Decision Report

Decision Maker:	Cabinet
Date:	28 February 2011
Title:	Response to consultation and proposals for a new Contributions Policy for Adult Social Care services
Reference:	2291
Report From:	Director of Adult Services

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1. Executive Summary

- 1.1. At its meeting on 27 September 2010, Cabinet agreed to consult on proposals for a new contributions based policy for charging for adult social care services that would support self directed support and personalised services.
- 1.2. This paper reports on the findings from the consultation exercise and recommends the approval of a new policy to be called '*Contributions Policy for Adult Social Care – paying for care at home*', which takes into full consideration the responses from the consultation which have been externally validated by the Hampshire Local Involvement Network (LINK).
- 1.3. Income from charging for services is an essential component of the Council's financial strategy and the proposed policy contributes towards ensuring the right balance of national funding, other income such as council tax and charging for services.
- 1.4. Currently the Council charges for some services but not others. Service users' expectations are changing and new personalised services are being developed. All councils are required to review their charging policies and to introduce personal budgets for social care by 2013. A new approach to charging is therefore required and this report focuses on those areas where the Council has discretion within the national charging policy framework.
- 1.5. A summary of the proposals, consultation responses, impact of the changes and recommendations to Cabinet is set out in Appendix 1. It is estimated that, should all the recommendations be agreed by Cabinet, the changes proposed would generate additional income in the region of £3.9m to £5.4m in a full year, which would be used to offset the cost of providing services.

Income in the first year is estimated to be between £1.7m and £3.5m, and would be partly dependent upon the actual date of implementation.

- 1.6. It is an important principle of contributions policies that everyone should have an individual financial assessment and no-one should be put in financial hardship as a result of paying for their care. Estimates from an analysis of the 13,000 current service users is that, if all recommendations are agreed by Cabinet, two thirds of services users would not see a change in what they pay, with 40% continuing to pay nothing at all. The one third who would see a change could expect to pay on average between £28 and £36 more per week. Actual amounts will vary according to individual circumstances.
- 1.7. The consultation responses have been externally validated by the Hampshire Local Involvement Network (LINK) whose summary report is attached as Appendix 2. The full report is available from <http://www.hants.gov.uk/consultation-outcomes.htm>.
- 1.8. The proposed outline policy framework, attached as Appendix 3, would sit alongside Charging for Residential Accommodation Guide (CRAG), the national policy on paying for residential care. Also attached for information as Appendix 4 is a non exhaustive list of services, indicating which would be free and which would not. Subject to Cabinet approval of the new policy, this list will be published and reviewed regularly to give further clarity in response to feedback from the consultation.
- 1.9. Councils are required to follow Department of Health statutory guidance when implementing their contribution policies, for example with regard to the financial assessment of the service user's means. Subject to Cabinet's approval of the proposed policy, local 'operating guidance' and other communications will be developed to improve the information currently available to service users, carers, the general public and Council employees in response to feedback from the consultation. It is proposed that this guidance is reviewed annually by the Director of Adult Services, as part of budget planning, also ensuring that it fully reflects service development, revised processes, legislation and national guidance.

2. Background

- 2.1. Councils have certain discretionary powers to seek service user contributions towards the cost of social care. Personal budgets are agreed with service users following an assessment of needs based on risks to safety and loss of independence; and the outcomes they wish to achieve. This is known as 'Self Directed Support'. The personal budget is used to buy services of choice to meet the eligible care needs. Service users may receive all or part of this budget as a Direct Payment, or ask the Council to commission services for them. The Council's current charging policies do not fully support this approach and are in need of updating as new personalised services are being developed.
- 2.2. Cabinet agreed at its meeting on 27 September 2010 that a consultation should take place on proposals to develop a new contributions policy for adult social care; and that a further report be brought to Cabinet following the

consultation exercise setting out the key findings and any proposals to introduce a new policy.

3. The Consultation Arrangements

- 3.1. The consultation exercise was planned to run from 4 October to 31 December 2010 to seek the views of individuals and organisations on a range of matters where the Council has discretionary powers when charging for care. The consultation period was extended to 14 January 2011 following requests from carers. There was also a need to rearrange two stakeholder events planned for December due to the weather conditions.
- 3.2. In total, 6,000 questionnaires were distributed to Hampshire residents. This included 4,000 to a representative sample of service users, including an 'easy read' version for 456 service users with learning disabilities. A further 1,800 questionnaires were sent to carers of people using Adult Services. Consultation packs were also distributed via all libraries, Adult Services day centres and area offices. Details of the consultation were published in a variety of local media; and in the Autumn edition of *Hampshire Now* which is delivered to all households.
- 3.3. 1,800 carers and representatives from 88 community and voluntary organisations were invited to events held across Hampshire in Romsey, Basingstoke, Waterlooville, Lyndhurst, and Winchester. Representatives from the Adult Services department also attended consultation events in Petersfield organised by the Personalisation Expert Panel (PEP), a carers meeting in Bishops Waltham, and a 'Carers Together' event in November. Representatives from the 11 older people's area forums were briefed at the County event in November.
- 3.4. A briefing for County Council Members was held by the Director of Adult Services on 26 October.
- 3.5. 1,453 responses to the consultation were received, a response rate of some 22%. Not all respondents answered all of the questions. Service users and carers made up 90% of the responses. The total cost of the consultation exercise was £20,500.

4. The Consultation Findings

- 4.1. The Local Involvement Network (LiNK) has undertaken a qualitative analysis of the consultation responses on behalf of Hampshire County Council, providing independent evaluation. The LiNK summary report is attached as Appendix 2. The LiNK also published the questionnaire on their web site and the 68 responses have been added to the overall findings. The consultation sought views on a range of matters over which the Council has discretion under national policy and where changes would facilitate the aims of a fairer, clearer local policy that supports personalisation. Respondents were asked to indicate next to each proposal whether they strongly agreed, agreed, neither agreed or disagreed, disagreed or strongly disagreed. A comments box was provided by each proposal.

Proposal 1: A Single Policy

- 4.2. Views were sought on the proposal to introduce a new single policy for all services for which the Council has a discretion to charge. This means non residential; and short term residential services of up to eight weeks. The policy aims are to promote independence for people living at home; be fair through treating people equitably while recognising they have different financial means and care needs; and to promote choice by simplifying the charging arrangements for the range of services available. It would mean all services for which the Council is permitted to charge would become chargeable. This would include day care and support worker services which would no longer automatically be free to the service user. People were asked for their views on whether this would be a fair way for people to contribute towards the cost of the services they use.
- 4.3. There were 1,413 responses to this questions with over 400 individuals making additional comments. The response to this question was significantly in favour of the introduction of such a policy.

Strongly Agree	11%
Agree	51%
Neither agree nor disagree	15%
Disagree	11%
Strongly Disagree	12%

Key themes arising were:

- a) Communications and the need for very clear, concise and simple explanation of any agreed policy revisions going forward, particularly relating to how personal budgets work and the financial assessment process
- b) Fairness and the need for a clear and well explained appeals process as part of the financial assessment
- c) More broadly, many respondents express concerns that the system penalises those who have savings and have worked hard to accrue them.

4.4 Impact assessments:

- i *Fairness and Equality:* The single contributions policy would apply equally to all 13,000 people who use services that support them to live at home. Approximately 7,800 (60%) would be unaffected by all services becoming chargeable as they have low incomes and would continue to pay nothing; or are paying the most they have been assessed as needing to contribute. The remaining 5,200 (40%) would be affected in different ways as they are currently using non-chargeable services as part of, or all of, their care package. The estimated average additional cost to service users would be between £28 - £36 per week, but will vary depending on the individual's circumstances.
- ii *Financial:* It is estimated that this proposal could generate between £3.5m and £5m per year; and could be achieved within existing costs of administration.

- iii *Performance:* All councils are required to review their charging policies to support personalisation and most seek contributions for services such as day care.

4.4. It is proposed that the Council adopt a single policy for all services over which it has discretion to seek contributions to the costs of care.

Proposal 2: Disability Related Expenses (DRE)

4.5. The financial assessment identifies the service user’s income and outgoings to determine the ‘net amount’ that could be used to pay for their care. Councils have discretion in how they treat disability related expenditure. The range of items is extensive and can include e.g. stair lifts, extra bedding, laundry, incontinence products, help with cleaning or the garden, transport costs (unless receiving mobility allowance), community alarms, special dietary needs, higher heating bills or special equipment.

4.6. Currently, service users are asked to identify each and every item of expenditure. This can be an intrusive, complex and a time consuming process both for service users and the Council, although it is the approach recommended by the national guidance. Question 2 asked whether the Council should consider having a ‘standard’ amount for disability related expenses. People would continue to be able to request an individual assessment of their disability related expenses if they wish.

4.7. There were 1,347 responses to this question. Over half of the respondents agreed with this approach, although concern has been expressed by the Personalisation Experts Panel of service users and carers (PEP) that people may not fully understand the implications of a standard amount which could therefore disadvantage the most vulnerable. Over 300 people commented on this proposal.

Strongly agree	9%
Agree	42%
Neither agree nor disagree	14%
Disagree	21%
Strongly disagree	14%

4.8. Impact assessments:

- i *Fairness and Equality:* a standard DRE could ensure all service users have an amount disregarded from their income, regardless of actual expenditure. Such a policy could treat people unfairly as service users will be affected in different ways, with some gaining and some losing out unless they seek a full DRE assessment. As advised by the PEP, it is likely that some service users may be unaware of their full disability related outgoings, which could be significantly higher. Others who commented also felt it would disadvantage those with significant physical disabilities and those who have the highest care needs. The average amount claimed is £35 per week, although the range is £0 to £100 per week. 24% of service users claim in excess of £40 per week, with 1.2% spending over £100 per week.

- ii *Financial:* The introduction of a standard DRE could generate an efficiency saving in the Financial Assessments and Benefits Team, County Treasurers Department of £30,000 through a reduction in the amount of time taken for individual financial assessments. Such an approach would result in loss of income to the Council as all service users would have an amount disregarded. Currently 30% of service users do not claim DRE expenses. Depending on the standard amount set, the Council could lose income up to the following amounts:

DRE	£35	£25	£20
Cost	£3.3m	£1.8m	£1.2m

- iii *Performance:* few Councils currently use standard DRE's.

- 4.9. It is proposed that the Council does not adopt a standard DRE as part of the financial assessment as this would lead to inequalities and loss of income to the Council. Cabinet will wish to be aware that the Adult Services Department is considering the introduction of a 'provisional maximum contribution' as part of improvements to Adult Services first point of contact services. This would include a provisional amount for DRE and would give people an earlier indication of what their contribution might be.

Proposal 3: Removing the maximum weekly charge

- 4.10. At present the most anyone pays towards their care is £440.23 per week, regardless of their financial circumstances and the actual cost of their services. The current average weekly cost to the Council of an older persons domiciliary care package is £175 per week; the maximum amount being paid by the Council is currently £853 per week. For people with learning disabilities, this increases to an average cost of £438 per week and a current maximum of £3,053 per week. Question 3 asked whether people assessed as being able to pay more than the current maximum weekly charge should do so. Appendix 5 gives an illustration of the impact of removing this limit, set alongside the impact of removing the maximum weekly contribution (Proposal 4 below) as they have joint and separate implications.
- 4.11. There were 1,358 responses to this question. The views in response to this question were divided with nearly 40% of respondents agreeing and some 46% disagreeing with the proposal.

Strongly agree	8%
Agree	31%
Neither agree nor disagree	12%
Disagree	26%
Strongly disagree	22%

- 4.12. Additional comments were made by 294 people, with opinions strong at both ends of the spectrum. Many of those who did agree qualified their views with the proviso 'as long as it is fair and does not cause financial hardship'. The Personalisation Experts Panel have also requested consideration of

incremental increases for current service users who would be financially affected by removing this limit (please see section 6 and recommendation 9 in Appendix 1).

4.14 Impact assessments:

- i. *Fairness and Equality:* removing the maximum weekly charge would not affect people with low incomes, but will affect service users with above average financial means and high cost care packages (see iii below). It is estimated that approximately 260 (2%) service users in Hampshire have a net income of more than £440 per week.

The modelling exercise previously reported to Cabinet estimated there could be up to 30 (10%) people who would see an actual increase in their contribution as their care costs as they would have financial means to pay the full cost. It was estimated that average additional contributions from these individuals could be £360 more per week or £19k per year. This would put this group on a par with people who choose not to seek Council support (self funders); and is regarded as fairer to the taxpayer and to those who do not have the means to fund their own care. More recently, the actual number of service users who would be affected has been identified as less than 5 people.

- ii *Financial:* The modelling exercise indicated that removing the limit could result in an increase in income to the Council of up to £560,000 per annum, but as indicated above, the current actual number of people is very small. Income from this policy change would fluctuate. Removing the limit would help safeguard against increased costs that could arise from those with the means to self-fund their care fully being eligible for some financial support from the Council.

- iii *Performance:* Many councils do not have a maximum weekly charge or are reviewing their policies in this regard. Further comparison with other councils shows that where a maximum limit is in place, the amount most service users actually pay is unaffected:

The percentage of service users by amount of weekly contribution:

	% who do not pay (low incomes)	% who pay less than £10	% who pay £10 - £99	% who pay £100 - £200	% who pay more than £200
Hampshire	38%	5.2%	46.9%	8.2%	1.7%
Average for councils	39.2%	8%	43.6%	6%	3.2%

- 4.15 It is proposed that the maximum weekly charge, currently £440, is removed and that Cabinet gives consideration to arrangements for people who will be affected by this policy change, as set out in paragraph 6 and recommendation 9.

Proposal 4: Maximum Weekly Contribution (% of assessed net income used to calculate a service users contribution to their care costs)

- 4.16 The financial assessment works out an individual's income and deducts their outgoings to determine their net income. Outgoings include the cost of mortgage, rent and council tax; disability related expenses and daily living expenses such as food and clothing. (Standard allowances for daily living are set by the Government, based on Income Support or Pension Credit benefit levels. An individual's allowance varies according to age, disability and circumstances; and when it is worked out a further 25 per cent is added.) The balance is the net income.
- 4.17 Under the Council's current policy no-one contributes more than 95% of their net income towards the cost of their care, although the Council could take 100% into account. Question 4 asked whether people should be expected to use up to 100% of their net income to contribute to their care costs. See Appendix 5 for an illustration of the impacts of removing one or both of the two amounts that limit what people pay towards their care costs.
- 4.18 There were 1,365 responses to this question. A significant majority of people disagreed with this proposal – the highest level of negative responses across all the consultation questions.

Strongly agree	3%
Agree	8%
Neither agree nor disagree	8%
Disagree	41%
Strongly disagree	40%

- 4.19 Typical of the 341 comments received were '*people should be allowed to have something they can call their own*' and '*people need some disposable income to maintain a level of control and independence*'.
- 4.20 Impact assessments:
- i. *Fairness and Equality*: Removing this limit would mean that 100% of a service users net assessed income could be used to contribute to their care costs, where currently 5% is retained by the service user. This option would disadvantage those on low incomes, as illustrated in Appendix 5; and would be a disincentive to those who could apply for welfare benefit entitlements. It is estimated that removing the limit could increase the contributions of services users, for whom this is relevant, by an average of £2 per week, but this will vary depending on individual circumstances.
 - ii *Financial*: Income to the Council would increase by approximately £125,000 per annum.
 - iii *Performance*: Based on a CIPFA benchmarking analysis of 42 other councils. Thirty councils take 100% of net income into account with twelve taking less. The lowest nationally is 50%.

4.21 It is proposed that the current policy to disregard 5% of net assessed income is retained in order to protect people on low incomes while treating all service users equitably. There would be no increase in contributions resulting in an estimated potential loss of additional income to the Council of £125k per annum.

Proposal 5: Short term residential care

4.22 At present there are different sets of charges and financial assessments for short term (up to eight weeks) residential care services, such as respite care and hostel accommodation. Question 5 proposed bringing these services within a new single policy for people living at home; and having a single financial assessment. This would mean there could be a change in the amount some people would be expected to contribute towards the cost of their short term residential services.

4.23 The Department of Health (DH) has now issued statutory guidance in respect of calculating contributions to personal budgets, and amended regulations in respect of Direct Payments have come into force. These confirm that in respect of residential stays of up to eight weeks Councils must charge in accordance with national Charging for Residential Accommodation Guidance (CRAG) and have two options:

- i To charge an amount it appears reasonable to the Council for the resident to pay
- ii To carry out a financial assessment which must be in accordance with provisions of CRAG - the residential financial assessment.

Option (ii) would continue the Council's existing practice which requires carrying out a separate CRAG financial assessment even where a service user has also had an assessment for non residential services. It is not stated in respect of option (i) how a reasonable amount might be determined nor whether a Council could use information from a non residential financial assessment to determine what a reasonable charge might be. Further work is required to fully understand the options in order for the Council to comply and to ensure equity between service users.

4.24 There were 1,325 responses to this question. The response to the proposal was in favour of bringing short term residential services under a single contributions policy, though 13% of those responding strongly disagree.

Strongly agree	6%
Agree	35%
Neither agree nor disagree	28%
Disagree	18%
Strongly disagree	13%

4.25 287 people commented in this section, but many felt unable to agree/disagree without more detailed information. This is reflected in the large percentage who neither agreed nor disagreed.

4.26 It is recommended that such services are brought under the single contributions policy framework for people living at home; and that further

work is carried out to consider the financial assessment and charging implications of the new DH guidance. Cabinet may wish to delegate to the Executive Member for Adult Social Care any necessary amendment to the policy framework.

Proposal 6: Personal injury awards

4.27 In recent years, an increasing number of people have received personal injury awards from courts for accidents or illnesses caused by someone else. These awards can be substantial and invested to generate income. They can be paid as a lump sum or in instalments; and there may also be an award of periodic payments. Some, but not all, awards specify sums to meet care costs. Question 6 asked people for views on whether the Council should take into account all elements of a personal injury award whether or not they specify future care costs, unless they must be disregarded for legal reasons. There were 1,334 responses to this question. Nearly 60% of people who responded were in favour of the proposal.

Strongly agree	15%
Agree	44%
Neither agree nor disagree	19%
Disagree	12%
Strongly disagree	11%

4.28 Comments were received from 226 people. Of these many expressed concern that awards for ‘damages/compensation’ should not be used for the purposes of personal and social care. This was a view also shared by the PEP who felt that such monies were compensation for a loss of way of life.

4.29 Impact assessments:

- i. *Fairness and Equality*: all income* and capital would be treated the same, regardless of its source, and used or disregarded in the financial assessment in accordance with national guidance. (NB *earned income is excluded to recognise the important role of employment in the lives of vulnerable adults). This proposal, together with the proposal to remove the maximum weekly charge, would ensure that those with the most financial means make the most contribution towards care costs.
- ii. *Financial*: The number of service users in this position is small and the Council already takes some elements of some awards into account. Incorporation of this proposal into a new policy is unlikely to increase income to the Council significantly.
- iii. *Performance*: some Councils are reviewing their policies in this area.

4.30 It is proposed that the Council should take into account, where permitted, elements of personal injury awards whether or not they specify future care costs. These could include damages, periodic payments and interest (unless they must be disregarded for legal reasons, for example where funds are administered by the Court of Protection).

Future Options

4.31 In recognition of the changing financial climate and the fact that public consultations are costly to conduct, the questionnaire sought views on two further areas where the Council had a discretion to charge for services, in order to gauge public opinion on possible options in the future. These areas are:

Carers

4.32 The County Council currently spends approximately £1m per year on a wide range of services that support over 8,000 carers. Of these, 1,800 carers use services that support them to provide regular and substantial care, for which the Council has discretionary powers to charge. The Council does not currently charge carers for these services, in recognition of their role and to support their health and wellbeing. Question 4.1 asked people whether the Council should consider asking carers to contribute towards the cost of services that directly benefit them.

4.33 There were 1,257 responses to this question. The response was overwhelmingly against the proposal:

Strongly agree	2%
Agree	11%
Neither agree or disagree	12%
Disagree	36%
Strongly disagree	39%

4.34 Over 461 comments were received, typically citing the amount of money carers save the Council. It is also clear that many are unsure about which services benefit them and which benefit the service user.

4.35 Impact assessments

The equalities and financial impact of a policy change would require further work. Other councils do not charge carers for services.

4.36 It is proposed that the Council welcome the strong support for the continuation of its current policy. In response to requests for greater clarity, the guidance for staff and information for users and carers will clarify the services available.

Crisis Response Services (Reablement)

4.37 Cabinet will be aware that as recommended by the Hampshire Commission on Personalisation, the Council recognises the value of timely reablement and offers such services free for a period of up to six weeks for people who are eligible for adult social care services. These services ensure the right care is available at home following discharge from hospital. They also help prevent unnecessary admission to hospital or long term care. At the time the consultation was launched, it was the policy of some councils to charge for such services and therefore the questionnaire asked for local views on the matter. More recently, the new Government has clarified that these services must be provided for free by councils.

4.38 For Cabinet interest, there were 1,287 responses to this question. Local public response to the proposal was in strongly in support of the current policy not to charge for reablement services.

Strongly agree	4%
Agree	21%
Neither agree nor disagree	11%
Disagree	35%
Strongly disagree	29%

4.39 The financial implications for service users and the Council have not been calculated as this policy is no longer within the discretion of the Council.

4.40 The proposal is that the Council welcomes the Government's recent clarification that reablement services are to be provided free by councils.

5. The Proposed Policy

5.1 Set out in Appendix 3 is the proposed policy framework for approval by Cabinet. This references national regulation and guidance and focuses on those areas where the Council has discretion. It sets out the policy aims, how these will be achieved and includes the proposed changes recommended in this report. It provides for the first time a single policy framework. It will be supported by guidance and communications for the general public, service users, carers and Council staff which will be reviewed annually.

6. Policy Implementation

6.1 It is proposed that the policy be implemented from July 2011 to allow time for service users to be notified of any changes to their contributions, and to put new IT and business processes in place to implement the new policy.

6.2 Comments and concerns from the public consultation have been expressed that service users faced with increases in contributions will need time to prepare for this and the Council should give consideration to phasing in these increases. This approach would have equalities implications as service users would not be treated the same. For example, to increase payments incrementally from current service users would disadvantage new clients. It would also lead to a loss of income and higher transaction costs to the Council. Cabinet is asked to consider and advise on how it would wish these concerns to be addressed.

7. Recommendations

7.1 The separate recommendations for each of the proposals as set out in Appendix 1 be approved.

7.2 The outline single policy framework '*Contributions Policy for Adult Social Care – paying for care at home*' be approved.

- 7.3 That short term residential services of up to eight weeks be brought under the single contributions policy framework for people living at home; and that a single financial assessment process is adopted, subject to a review of the Department of Health guidance.
- 7.4 That the Executive Member for Adult Social Care be asked to consider any future amendments to the outline policy framework including a review of the recent Department of Health guidance.
- 7.5 The arrangements for the implementation of the policy during 2011/12 be agreed, to enable those most affected to have time to plan for the increased contributions they will need to make; also ensuring clear and concise information is available to service users, carers, staff and the general public.

CORPORATE OR LEGAL INFORMATION:**Links to the Corporate Strategy**

Hampshire safer and more secure for all:	NO
Corporate Improvement plan link number (if appropriate):	
Maximising well-being:	YES
Corporate Improvement plan link number (if appropriate):	
Enhancing our quality of place:	NO
Corporate Improvement plan link number (if appropriate):	

Other Significant Links

Links to previous Member decisions:		
<u>Title</u>	<u>Reference</u>	<u>Date</u>
Report on the Commission of Inquiry into Personalisation and the proposed model for adult social care in Hampshire	458	22 December 2008
Efficiencies and Expenditure Reductions: Transforming the County Council	1926	26 July 2010
Charging Policy for Adult Services – permission to consult on proposals to develop a new ‘contributions’ based policy	1862	27 September 2010
Direct links to specific legislation or Government Directives		
<u>Title</u>	<u>Date</u>	
Fairer Charging Policies for Home Care and other non-residential Social Services. Dept of Health	Sept 2003	
Fairer Contributions Guidance. Dept of Health	14 July 2009	
Charging for Residential Accommodation Guide (CRAG)	various	
National Assistance Act 1948		
Health Services and Public Health Act 1968		
Chronically Sick and Disabled Persons Act 1970		
NHS Act 2006		
The Carers and Disabled Children Act 2000		

Section 100 D - Local Government Act 1972 - background documents

The following documents discuss facts or matters on which this report, or an important part of it, is based and have been relied upon to a material extent in the preparation of this report. (NB: the list excludes published works and any documents which disclose exempt or confidential information as defined in the Act.)

Document

Location

None

IMPACT ASSESSMENTS:

1. Equalities Impact Assessment:

A summary of the recommendations and impact assessments is attached as Appendix 1.

A full Equalities Impact Assessment has been published and is available on the County Council website at <http://www3.hants.gov.uk/as-equality-ia-archive.htm>.

2. Impact on Crime and Disorder:

No implications arising from this report.

3. Climate Change:

- a) How does what is being proposed impact on our carbon footprint / energy consumption?

No implications arising from this report.

- b) How does what is being proposed consider the need to adapt to climate change, and be resilient to its longer term impacts?

No implications arising from this report.