



## Equality Impact Assessment

### What is an Equality Impact Assessment (EIA) and why does the County Council do them?

The [Public Sector Equality Duty](#) (PSED) is an obligation within the [Equality Act 2010](#) ("the Act"), which asks public authorities, like Hampshire County Council, to give 'due regard' to equality considerations, in particular to:

- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.
- Advance equality of opportunity between people who share a protected characteristic and those who do not.
- Foster good relations between people who share a protected characteristic and those who do not.

This includes assessing the impact of policies and practices on individuals and communities with a protected characteristic, as defined in the Act and some other specific groups. The County Council uses EIAs to ensure it has paid 'due regard' to equalities considerations when there are changes to a service or policy, a new project or certain decisions.

EIA author	Position & Department	Contact
Alana Perryman	Project Manager Adults' Health and Care	alana.perryman@hants.gov.uk Tel:03707 794934

Title:	Capital Depleters Process Project
Related EIAs:	EIA Number: 364

EIA for Savings Programme:	No
Service affected	The management of self-funding individuals when their capital reaches £40,000 or less.
Description of the service/policy/project/project phase	<p>A Capital Depleter is an individual 'self-funding' their care and are considered to face capital depletion when their capital (savings and assets) falls to the capital limit, which is currently set nationally at £23,250. Note that the equivalent future capital limit may change under any national reform. The aim of the project is to review the existing Client Capital Depletion process and policy. On review, it was identified that the process and policy could be more straightforward, more transparent for individuals who may need to use the process and provide clearer guidance for providers. Also, that other steps could be introduced to ensure the process was as robust as possible. Furthermore, it is proposed that steps are introduced to identify earlier in the customer journey when an individual will move from self-funding to Hampshire County Council part or full funding their care. This will in turn support the Council to prevent debt accumulation, improve financial management and forecasting and increase efficiency across the operational and Brokerage &amp; Billing teams, whilst also improving the customer journey. The teams in scope for the process change are:</p> <ul style="list-style-type: none"> <li>• Contact Assessment and Resolution Team (CART)</li> <li>• Reviews &amp; Intervention Team (RIT)</li> <li>• Brokerage Teams</li> <li>• Financial Assessments &amp; Benefits Team</li> <li>• Paying for Care Team</li> <li>• Adults' Provider Payments</li> <li>• Operational Teams (Social Workers)</li> <li>• Commissioning Team</li> <li>• Contracts Team</li> </ul> <p>Additionally, internally &amp; external care providers will be made aware of the change in process alongside individuals and their representatives. Individuals most likely to be affected are Older Adults who have an eligibility for Residential or Nursing Home Care to be funded or part funded by Hampshire County Council. This may affect individuals support by the Learning Disability, Physical Disability or Mental Health teams but this is far less likely due to the type of support needed and as individual whose capital depletes are usually Older Adults and have been self-funding their care and support in a Care Home or in their own home in the later stages of their life.</p>
New/changed service/policy/project	The number of Capital Depleters are increasing across the range of care settings, both new to us or already previously known to us. We are only aware of these cases when they are raised by the client/rep or providers, and

often these cases will remain as unallocated cases due to the clients being in a safe setting. The resultant issues are that providers are not paid often for many months. This is impacting on financial forecasting, provider relationships, client and family's anxiety and complex refunds being managed by Brokerage and Billing. The complex refunds and query management that takes place due to the above resultant issues produce higher workloads for the Brokerage & Billing Teams. The current process is not fit for purpose, with local variations within teams on how Capital Depleters are managed. It does not provide opportunity to set out the Council's policies around moving people and top up arrangements. Therefore, work has been undertaken to review the policy and process in its entirety and make changes to ensure a better customer journey and case handling. To date, the revisions made to the existing Capital Depleters process have been defined and agreed by the Heads of Service for the Adults' Health & Care Older Adults, Headquarters and Commissioning teams. The most significant proposed changes to the process are:

- Increased the threshold we recommend contact is made with Hampshire County Council (from £30K to £40K)
- Recruitment and induction of new operational staff into the Review & Interventions Team to assist with managing Capital Deleter referrals.
- Communication and public facing literature for providers and public on process and contact with Hampshire County Council
- Updated risk assessment to include business risks (political, financial, reputational)

The proposed Capital Depleters process improvement implementation will run alongside the Care Home Framework & Choice of Accommodation Policy. The Care Home Framework will ensure that individuals who face capital depletion will be able to access long-term care that is fit for purpose, able to meet the individuals eligible care and support needs and ensures best value for money. The Choice of Accommodation Policy intends to offer a managed choice of options to individuals and their representatives for their care home options within a set, agreed criteria. It will provide transparent and robust public & provider communications around this.

## Engagement

A workshop was held with key stakeholders from across the business in the summer of 2023 to discuss and plan for the change in the current capital depleters process. Once a draft plan was created, further engagement took place to confirm the finer detail of the process and associated changes required.

Communications & engagement is planned with the business and internal & external providers. This will include Commissioning attending provider market engagement events, delivery of Care Home Framework presentations (including information on Capital Depleters) to internal teams and the updating of service user communications. The Social Care Practice Manual will also be updated to reflect the change in policy and process and ensure all staff have access to the most up-to-date information.

A series of workshops will be delivered to the Review & Interventions Team, to ensure they are equipped with the knowledge and skills to undertake the case handling of Capital Depleters. Other internal teams, such as the Older Adults' Community Teams, will receive a series of communications via the Wider Operational Managers Meetings, emails from the Project Team via their Heads of Service and/or District Service Managers, and articles published in Team / Managers Brief.

Moreover, individuals and/or their representatives will receive information and advice on capital depletion when they contact CART via the 'CART Capital Depleters Checklist'. The checklist is designed to assist CART Finance with holding meaningful conversations with individuals around their financial situation and will aid CART in gathering more information prior to referring the case to the Practitioner. Literature is being produced for individuals and/or their representatives, such as online resources and leaflets.

## Equalities considerations - Impact Assessment

### Age

Impact on public	Positive
Impact on staff	Positive
Rationale	<p>The changes the project is due to make will support the management and prevention of debt accumulation by both the Council and individuals, improve financial management and forecasting and increase efficiency across the operational and Brokerage &amp; Billing teams, whilst also improving the customer journey.</p> <p>The group most individuals impacted are individuals of pensionable age who are supported by the Older Adults' Teams. The proposed changes to the Capital Depleters process should resolve individuals or their representatives' queries in a more streamlined way, reducing levels of anxiety relating to financial insecurity, the number of complaints from individuals and their representatives as well as providers, and reduce levels of stress associated with the current delays in the process.</p> <p>No proposed changes to the Capital Depleters process will negatively or positively impact staff due to their age.</p>

Mitigation	

## Disability

Impact on public	Positive
Impact on staff	Neutral
Rationale	<p>The changes the project is due to make will support the management and prevention of debt accumulation by both the Council and individuals improve financial management and forecasting and increase efficiency across the operational and Brokerage &amp; Billing teams, whilst also improving the customer journey.</p> <p>The group most impacted are individuals of pensionable age who are supported by the Older Adults' Teams. The 2021 Census data shows that the likelihood of someone declaring a disability increases with age, with around 50% of the Hampshire population aged 85 or over declaring a disability. Therefore, it is anticipated that the proposed changes to the Capital Depleters process will positively impact individuals with a disability through resolving queries in a more streamlined way, reducing levels of anxiety relating to financial insecurity, the number of complaints from individuals and their representatives as well as providers, and reduce levels of stress associated with the current delays in the process.</p> <p>No proposed changes to the Capital Depleters process will negatively or positively impact staff due to their declared disability.</p>
Mitigation	

## Gender Reassignment

Impact on public	Neutral
Impact on staff	Neutral
Rationale	<p>The project team are not aware of any individuals having undergone or undergoing gender reassignment. However, practitioners in the community teams may have access to this information where it has been shared. No proposed changes will negatively or positively impact individuals who have undergone or are undergoing gender reassignment.</p> <p>The project team are not aware of any members of staff having undergone or undergoing gender reassignment. No proposed changes will negatively or positively impact staff who have undergone or are undergoing gender reassignment.</p>
Mitigation	

## Pregnancy and Maternity

Impact on public	Neutral
Impact on staff	Neutral
Rationale	<p>No proposed changes will negatively or positively impact individuals who have who are pregnant or planning on having children. The mainly affected public group are over the age of 60 and therefore are not impacted by this protected characteristic.</p> <p>We do not yet know if any staff are currently on or planning to be on maternity leave. No proposed changes will negatively or positively impact staff who are or will be pregnant or on maternity leave.</p>
Mitigation	

## Race

--	--

Impact on public	Neutral
Impact on staff	Neutral
Rationale	<p>The proposed changes would not have a negative or positive impact on individuals based upon their race. However, The Income Deprivation Affecting Older People Index (IDAOP) ranks 14 areas in Hampshire in the most deprived decile nationally, 12 of these are in Rushmoor where over 23% of the population are from non-white British ethnic groups. Therefore, there may be a high number of individuals with a race protected characteristic accessing services following capital depletion in the Rushmoor area. However, there is no data to support this statement. The Capital Depleters policy &amp; process itself will not disproportionately impact individuals due to their race.</p> <p>Staff will not be negatively or positively impacted by the proposed changes due to their race.</p>
Mitigation	

## Religion or Belief

Impact on public	Neutral
Impact on staff	Neutral
Rationale	<p>The proposed changes would not have a negative or positive impact on individuals based upon their religion or belief.</p> <p>Staff will not be negatively or positively impacted by the proposed changes due to their religion or belief. Christian holidays are observed as Bank Holidays in the UK. The flexible working policy will remain in place for those members of staff who wish to observe other religious holidays, such as Ramadan.</p>
Mitigation	

## Sex

Impact on public	Neutral
Impact on staff	Neutral
Rationale	<p>The proposed changes would not have a negative or positive impact on individuals based upon their sex.</p> <p>Staff will not be negatively or positively impacted by the proposed changes due to their sex.</p>
Mitigation	

## Sexual Orientation

Impact on public	Neutral
Impact on staff	Neutral
Rationale	<p>The proposed changes would not have a negative or positive impact on individuals based upon sexual orientation.</p> <p>Staff will not be negatively or positively impacted by the proposed changes due to their sexual orientation.</p>
Mitigation	

## Marriage and Civil Partnership

Impact on public	Neutral
------------------	---------



Impact on staff	Neutral
Rationale	<p>Impacts on marriage and civil partnerships are recognised, however these are determined to be neutral. Should partners chose to live together, the County Council would not expect a financial situation to affect one and not the other, therefore their living arrangements and financial assessments will be considered both collectively and separately, as per Charging Regulations at that time, to ensure their wishes are taken into account and their wellbeing and right to family life are not detrimentally affected.</p> <p>Staff will not be negatively or positively impacted by the proposed changes due to their marital status.</p>
Mitigation	

## Poverty

Impact on public	Positive
Impact on staff	Neutral
Rationale	<p>The proposed changes to the Capital Depleters process support the move to debt prevention and improving financial management for individuals. This will take place through increasing the threshold we recommend contact is made with Hampshire County Council from the point a individual reached £30,000 capital to £40,000 capital. By increasing the threshold, the probability of the service user accruing a debt with their current care provider is reduced.</p> <p>The Care Home Framework EIA states: The Joint Strategic Needs Assessment Demography data shows 9% of residents aged 60 or over experience income deprivation. The Income Deprivation Affecting Older People Index (IDAOPi) ranks 14 areas in Hampshire in the most deprived decile nationally, 12 of these are in Rushmoor where over 23% of the population are from non-white British ethnic groups. However, due to access to services being through business-as-usual routes following a care act assessment and subsequent financial assessment, the recording of such impact and data related to how many individuals accessing services are living in poverty is not specifically part of the framework programme.</p>

	Staff will not be negatively or positively impacted by the proposed changes due to their financial personal financial situation, nor will the proposed changes have an impact on their financial status.
Mitigation	

## Rurality

Impact on public	Neutral
Impact on staff	Neutral
Rationale	<p>The proposed changes would not have a negative or positive impact on individuals based upon their home location. The proposed changes to the Capital Depleters process lead into the Choice of Accommodation policy, and the move to purchasing care through the Care Home framework will not disproportionately impact individuals due to living rurally. However, it should be noted that through the implementation of the Choice of Accommodation policy as part of the long-term residential and nursing care contracts, individuals will be given access to a wider geographical choice of homes dependent on their needs, for long term care provision. This means that those living rurally will have equal access to homes in both rural and urban areas based on their assessed needs and personal preferences.</p> <p>Staff will not be negatively or positively impacted by the proposed changes due to their home location.</p>
Mitigation	

Geographical Impact:All Hampshire

## Equality Statement

Additional information:

The proposed changes to the Capital Depleters process are linked to the Care Home Framework. The Care Home Framework EIA number is: 364.

## Overview Statement:

A summary assessment to show that due regard to the Public Sector Equality Duty has been paid, which is undertaken when a full EIA is not needed:

EIA reference number: 00508

Date of production of EIA for publication: 30/01/2024