

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
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Title:	Paying for Care Policy
Related EIAs:	EIA Number: Outcome of the Consultation on Proposed Changes to the Paying for Care Policy Oct 2016
EIA for Savings Programme:	Yes EIA - Adults' Health and Care - Customer and Provider Interactions
Service affected	Paying for Care
Description of the service/policy/project/project phase	Social care services with some limited exceptions is not provided free of charge. Paying for Care Policy aims to ensure that individuals in Hampshire who require social care services are charged fairly, based on a means tested financial assessment for both residential and community settings. The policy explains the financial assessments process and how the charges are applied in compliance with the Care Act 2014.
New/changed service/policy/project	Although there has been no substantial change to the policy affecting charging or how the process works, in accordance with our current processes the policy which was last revised in 2016 has been extensively updated to align with current language, terminology and business processes. In line with this, the existing EIA is also being reviewed to ensure that the County Council understands the ongoing impacts of the policy on its residents and staff.

Engagement
No consultation has been undertaken as there has been no substantial change to the policy.
The revised policy wording has been developed following extensive research into the public-facing information provided by other local authorities. It also reflects lessons learned and feedback received through complaints and customer contact.

Equalities considerations - Impact Assessment

Age

Impact on public	Negative - Low
Impact on staff	Neutral
Rationale	<p>Hampshire is an affluent County with an aging population with increasingly complex needs. Compared to England, Hampshire has a greater proportion older population aged 50 years and over, and a lower proportion of 20 to 44 years old (JSNA).12% of the population in Hampshire is aged 75 years and over compared to 9% in England.</p> <p>HCC service user data shows that over 52% (8,093) of AHC service users with a chargeable service provision in July 2025 were 75 years and over with 97% of AHC these were using Older Adults services.</p> <p>Older people are disproportionately affected by the policy as they are more likely to have accumulated wealth.</p> <p>The Paying for Care Policy has no upper limit and has the potential to erode financial resources of those who need care over a longer period.</p> <p>The impact is deemed as low negative because as paying for care policy enables care and support to be affordable and sustainable for the benefit of an aging population with increasingly complex care and support needs.</p>
Mitigation	<p>Everyone who contributes toward the cost of their care will undergo an annual review of their financial assessment. This review ensures that any changes in benefits, income, or care charges are accurately reflected.</p> <p>As part of the review, individuals are invited to inform the Council of any changes in their financial circumstances. However, they do not need to wait for the annual review, they can request a reassessment at any time if their situation changes.</p>

Disability

Impact on public	Negative - Low
Impact on staff	Neutral

Rationale	<p>According to the Census 2021, 16.4 % of the total population aged 16 years and over identified as disabled under the Equality Act which means that they have a physical or a mental health condition lasting or expected to last 12 months or more.</p> <p>6.8 % (94,800) of Hampshire’s total population aged 65 years and over identified as disabled under the Equality Act (JSNA).</p> <p>All AHC clients with a provision meet the Care Act 2014 eligibility criteria and are supported by services for older adults, learning disabilities, physical health and mental health. In July 2025, of the 15,194 AHC clients receiving care and support, 63% were for aging related conditions, 21% for learning disabilities, 11% for physical disabilities and 5 % for mental health conditions.</p> <p>According to the Joseph Rowntree Foundation (2020), 30% of people with disabilities in the UK live in poverty compared to 20% non-disabled people. Those with lower financial resources are less likely to be flexible in contributing to or accommodate the cost of their care.</p> <p>People with learning disabilities, declining cognition and mental health challenges may be unable to engage with or understand the financial assessment process.</p> <p>The impact of the policy on disabled people is deemed low negative because the policy enables disabled people to benefit from an affordable and sustainable care and support provision.</p>
Mitigation	<p>The Council ensures that an individual's income is not reduced below a specified level known as the Minimum Income Guarantee (MIG). This allowance is applied during non-residential financial assessments to cover essential everyday living costs at home, such as food, utilities, and insurance.</p> <p>The MIG amount is set and reviewed annually by the Department of Health and Social Care through Local Authority Circulars. It varies depending on factors such as an individual's age, disability status, relationship status, and family circumstances.</p> <p>Additional allowances can also be made for Disability Related Expenses (DREs) - costs that an individual incurs due to their disability which are not already covered within their care and support plan.</p> <p>The Council considers DREs in line with guidance set out in Local Authority Circulars issued by the Department of Health and Social Care, and with reference to information provided by the National Association of Financial Assessment Officers (NAFAO).</p> <p>These allowances are reviewed each April, alongside annual increases to benefits and pensions. Any updates are applied to financial assessments for the following financial year. Individuals may also request a review of their DREs at any time if their circumstances change.</p>

If an individual is unable to engage online or via a telephone call, a face-to-face arrangement with an assessment officer could be arranged to help them understand the assessment process. Another person such as a family member (or an advocate) can be nominated to represent or assist the service user with the financial assessment. A legal financial representative can also be appointed. Where the service user does not have capacity to engage with the financial assessment, the County Council will work with a legal representative. An appointee can only deal with benefit claims and monies.

Gender Reassignment

Impact on public	Neutral
Impact on staff	Neutral
Rationale	<p>In Hampshire, of those who identified as being a different gender to that registered at birth during the Census 2021, 0.1% identified as 'Trans Woman', 0.1% as 'Trans Man', 0.1% identified as 'non-binary', less than 0.1% identified as 'other' and 0.1% did not specify a gender.</p> <p>The paying for care policy does not directly consider gender reassignment.</p> <p>There is no indication that the policy will impact on residents because of gender reassignment.</p>
Mitigation	

Pregnancy and Maternity

Impact on public	Neutral
Impact on staff	Neutral
Rationale	<p>The total number of pregnancies recorded in Hampshire in 2022 was 12,664 (JSNA). It is estimated that around 5-10% of pregnant women in England may have complex social needs such as safeguarding concerns, mental health and domestic abuse issues.</p> <p>Although minimal in number, during pregnancy the need to consider paying for care could exacerbate financial worries especially of those who come from low-income households.</p> <p>An individual can request a review of their financial assessment at any time if their situation changes. If an individual is experiencing hardship, long or short term, or their financial situation changes due to other factors such as pregnancy, the case can be referred to the social care team to establish if any further changes are needed to the financial assessment charge.</p>

	<p>Service user will not be asked to pay more than they can afford, and they will be given a personal expenditure allowance (PEA) if they are in a care home and weekly national minimum income guarantee (MIG) if their care is at home.</p> <p>The measures put in place would alleviate concerns of pregnant women and women on maternity. The impact is therefore deemed as neutral.</p>
Mitigation	

Race

Impact on public	Neutral
Impact on staff	Neutral
Rationale	<p>The Hampshire population is less diverse than England as a whole, with 92.6% of residents describing themselves as belonging to White ethnic groups compared to the national average of 81%. The diversity of the area's population is increasing, 7.4% of the population described themselves as of an ethnic background other than White in 2021, up from 5% in the previous census conducted in 2011. Over 23% of the Rushmoor population are from a non-white British ethnic group, with over 10,575 people identifying themselves as Nepalese in the 2021 Census.</p> <p>In July 2025, of the AHC clients receiving care and support, 86.4% were white and 2.8% from another ethnic group (1.3% Asian, 0.6 % Black, 0.4% mixed, 0.5% other ethnicities) and 10.7% were unknown.</p> <p>Due to low legal literacy among some ethnic minority communities, they are less likely to understand the implications of not putting legal arrangements in place to clarify ownership of financial assets particularly in multi-generational or multiple occupancy households.</p> <p>People with limited English proficiency and low literacy may struggle to engage with or understand the financial assessment.</p> <p>The service user can nominate another person to represent or assist them during the process.</p> <p>Where there are significant barriers to communication, a face-to-face meeting with an assessment officer and translator if required may be arranged.</p> <p>Due to the mitigation measures available to alleviate impacts due to language barriers or low legal literacy the impact is deemed as neutral.</p>
Mitigation	

Religion or Belief

Impact on public	Neutral
Impact on staff	Neutral
Rationale	<p>Census 2021 data reported slightly over half of Hampshire residents (51.5%) stated they had a religion, 42.8% no religion and 5.7% did not say.</p> <p>Christianity was the dominant religion with 47.8% of Hampshire residents reporting to be Christian. 1.1% reported Hindu as their religion, 0.9% Muslim and 0.8% Buddhist.</p> <p>Across the districts religion varied the most in Rushmoor, reflecting the greater ethnic diversity in this district. Christianity remained the dominant religion, but the proportion was lower compared to Hampshire (42.3%). 5.7% reported Hindu as their religion, 2.5% Muslim and 4.7% Buddhist (JSNA).</p> <p>Provision of culturally appropriate care where access to religious facilities and faith groups, and religious practices and beliefs are considered, are not necessarily more expensive and could lead to long term health benefits of service users. However, there may be limited choice of care homes that meet requirements, and the location could mean a longer distance from family member to travel to visit their loved one.</p> <p>Each case is assessed on its own merits, taking into account the individual's specific circumstances and supporting evidence where required.</p> <p>The measures put in place would provide an opportunity for individual cases to be reviewed. The impact is therefore deemed as neutral.</p>
Mitigation	

Sex

Impact on public	Negative - Low
Impact on staff	Neutral
Rationale	<p>In Hampshire female life expectancy at 84.4 years is longer, compared to male life expectancy at 81.2 years. In the most deprived areas, females tend to live 4.9 years and males 6.8 years less (JSNA).</p> <p>Women are likely to be disadvantaged when their spouses are taken into care as they could potentially lose out on income from their partners state pension contributions as they tend to have lower pensions due to taking time off work for caring responsibilities for their children, spouses or partners, and parents.</p> <p>Women are more likely to benefit from paid care of their spouses as they tend to provide more unpaid care. The 2021 Census showed that 10.3% of females compared to 7.6% of males provided unpaid care.</p>

	<p>58.3% of HCC service users are females, 41.4% are male, 0.1% are non-binary and 0.2% are not recorded.</p> <p>On balance it is deemed that paying for care would have a negative impact on the financial wellbeing of women.</p>
Mitigation	<p>Under central government rules for financial assessments, the Council has the discretion to allow a spouse or partner (regardless of gender) to retain a “partner’s allowance” in non-residential care assessments. Additionally, they may be permitted to retain up to 50% of the private pension of the individual receiving residential care.</p> <p>To help reduce the financial impact on the spouse or partner, the Council also encourages them to explore any benefits they may be entitled to in their own right.</p>

Sexual Orientation

Impact on public	Neutral
Impact on staff	Neutral
Rationale	<p>In the 2021 Census, 91.3% of Hampshire residents identified as ‘Straight or Heterosexual’. 1.1% identified as ‘Bisexual’.0.3% identified as ‘All other sexual orientations’ this was similar across all districts. 6.2% did not answer.</p> <p>The paying for care policy does not directly consider sexual orientation. Consideration of the impacts on partners is made under marriage and civil partnership.</p> <p>There is no evidence to suggest a disproportionate impact based on sexual orientation, so the impact is deemed to be neutral.</p>
Mitigation	

Marriage and Civil Partnership

Impact on public	Neutral
Impact on staff	Neutral
Rationale	<p>For the purposes of the financial assessment of the person receiving care, financial resources are considered separately. Jointly owned assets, income and expenses will be divided equally when undergoing the financial assessment.</p> <p>Where capital asset is jointly owned, the owner is treated as owning an equal share of that capital asset unless there is evidence that they own more (or less) than an equal share.</p> <p>If an individual is moving into or residing in a care home on a permanent basis, the value of their main home will not be considered if their spouse or partner continues to live there.</p> <p>The impact is deemed neutral as measures are in place to ensure assets and income of a spouse or partner are not used to pay for the</p>

	care of their loved one.
Mitigation	

Poverty

Impact on public	Neutral
Impact on staff	Neutral
Rationale	<p>Although considered among the least deprived authorities in England, there are pockets of deprivation in Hampshire. The most deprived areas are in Rushmoor, Havant, Gosport and Eastleigh, with pockets also in the New Forest. Havant is the most deprived district in Hampshire.</p> <p>Under the Income Deprivation Affecting Older People Index which covers those aged 60 and over, 14 local areas in Hampshire, 12 of which are in Rushmoor are considered amongst 10% most deprived areas in England, 9% of residents aged 60 or over experience income deprivation (JSNA Demography).</p> <p>Department of Health and Social Care evidence suggests that those from low-income households have worse health outcomes and spend more time in need of support. People in deprived areas live twice as long in poor health than those in least deprived areas. In Hampshire, people living in the most deprived areas live in poor health for 19.3 years, compared to 13.1 for those living in the least deprived areas.</p> <p>People living in poverty may self-exclude due to the cost of care.</p> <p>Service user will not be asked to pay more that they can afford. They will be given a personal expenditure allowance (PEA) to spend on personal items such as clothes if they are in a care home and weekly national minimum income guarantee (MIG) if their care is at home.</p> <p>Where assessed charges may lead to difficulties in paying for care, an individual request a review of the financial assessment. This will involve the Council asking for further detailed financial information to confirm the individual does not have sufficient means to pay the assessed charge. If this is the case a waiver may be given for all or part of the care charges and might be time-limited or on-going.</p> <p>The impact is deemed neutral as measures are in place to ensure the care charges are based on individual circumstances, with the opportunity to review, waiver or reduce the charge as necessary.</p>
Mitigation	

Rurality

Impact on public	Neutral
Impact on staff	Neutral
Rationale	Based on rural classification and local estimates, around 30-35% of Hampshire's population is considered to live in rural areas (HCC

Population estimates and forecasts up to 2030). People who live in rural areas in Hampshire have lower median income than those who live in urban areas due to access to employment, services and infrastructure. Rural areas such as East Hampshire, Test Valley and the New Forest often show lower income levels on average especially in more isolated communities. There are also pockets of income deprivation hidden in some affluent rural areas in Hampshire (Office of National Statistics). Those who live in deprived rural areas may find it more difficult to afford the cost of care.

Most care homes are in or near urban centres where there is better infrastructure, access to health care and staffing availability which make them viable locations for providers. This has resulted in gaps in provision in parts of rural Hampshire such as the New Forest, Test Valley and East Hampshire. The lack of choice could mean increases in cost of care for those who live in rural communities. This could also mean increased travel costs for those who access day services and an increased risk of social isolation for those who cannot afford to.

AHC operates a Help to Live at home framework that has a large number of providers signed up, who cover the whole of the county. Enhanced rates are available to providers to make it financially viable for them to bid on packages in hard-to-reach areas.

Where a person is assessed as eligible for transport provision as per the AHC transport policy, the costs will be included in the person's Personal Budget. Transport costs can also be considered a Disability Related Expense (DRE) where they arise due to an individual's disability. Each case is assessed on its own merits, taking into account the individual's specific circumstances and supporting evidence where required

The measures put in place would provide an opportunity for individual cases to be reviewed. The impact is therefore deemed as neutral.

Mitigation

Geographical Impact: All Hampshire

Equality Statement

Additional information:

The equality impact assessment considers clients in receipt of chargeable services. The policy determines whether they pay for their care.

All individuals receiving services commissioned on their behalf by the Council are required to undergo a financial assessment. This assessment determines their eligibility for financial assistance and outlines what, if anything, they will be expected to contribute toward the cost of their care.

The criteria for what is included in a financial assessment are set by central government. The Council's Paying for Care Policy explains how these national rules are applied locally. The impact of the charging policy is

monitored through feedback mechanisms such as complaints, queries, and debt tracking.

Assessment rationale (Employees)

The impact of the policy on staff has been assessed as neutral as the impact will affect them in their capacity as residents of Hampshire rather than in relation to their work.

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:

This will affect individuals under the care of Hampshire County Council, but in a general as opposed to any/each protected characteristic.

EIA reference number: 00835

Date of production of EIA for publication: 31/07/2025