

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:	Direct Payments Strategy for AHC/CSD Shared Services
Related EIAs:	None
EIA for Savings Programme:	No
Service affected	Direct Payments for Adults Health and Care and Children's Services.
Description of the service/policy/project/project phase	Service: Direct Payments (DPs) are a key component of personalising care and support services and empowering individuals to have more control over how their social care needs are met. Instead of receiving services directly from Hampshire County Council (HCC) or care providers, eligible individuals can choose to receive a DP, enabling them to arrange and manage their care independently. To receive a DP, an assessed individual must meet the criteria. HCC calculates a personal budget to meet an individual’s care and support needs. The cost of providing a Direct Payment is usually lower than the equivalent cost of providing (eg) a commissioned Domiciliary Care service. Project Phase: Produce DP Strategy & key activity areas: The DP Strategy for AHC/CSD Shared Services will: Outline HCC’s delivery of DPs to assist staff and the public (national guidance allows variance in Local Authority delivery) Provide a vision, approach, scope and improvement pathway for change and the promotion of DPsAffirm

HCC's commitments to enhancing DP outcomes, services, and support. Align expectations for the actions needed to deliver change with the HCC Vision. Define the relationships required to scrutinise and advise direct payments policies and procedures, as recommended by the Care Act. Showcase what can be achieved with co-production. In addition, the 4 key action areas identified within the Strategy (Support, Best Practice, Digital and Marketplace) address a variety of problem statements:

Support: Information for managing and understanding Direct Payments can be complex, especially where Personal Assistant (PA) employer information is required. HCC offers a specialised DP Support Service (DPSS) which responds to queries within working hours. There is no self-service information for the public. Capacity to develop, maintain and publicise the information offer from within the team is limited, due to the need to respond to queries.

Best Practice: Practitioners need to feel confident in their knowledge of DPs, PA rules and the preferred Virtual Wallet system for managing payments, to propose and assist in setting them up appropriately to benefit the greatest number of people.

Digital: A separate account is required to hold DP funds. Getting information about funds in traditional designated bank accounts is often problematic, and there is little transparency to allow focussed discussions about the use of DP funding and prevent overpayments accumulating.

Marketplace: if there are not enough PAs in the Marketplace there is no choice for DP recipients for their care and the DP itself becomes less suitable. Commissioning seeks to maintain a thriving marketplace.

New/changed service/policy/project

The overall aim of the Direct Payments Strategy, which has been coproduced with the Hampshire DP Framework Partnership coproduction group, is to outline the approach, governance and activities which will encourage growth in the number of Direct Payments recipients, PAs within Hampshire, and users of Virtual Wallet. These can be summarised in the key action areas of Support: The Direct Payments Support Service (DPSS) assists clients with queries about their direct payments. This includes how to use personal budgets, guidance on financial management, and providing the necessary information to make informed decisions. DPSS also encourages and facilitates peer-to-peer support among direct payment recipients through coproduction.

Best Practice: Supporting HCC practitioners in being confident with when and how to offer direct payments, including the details of employing a personal assistant or managing a direct payment via Virtual Wallet to ensure they are offering of those services to the extent they should be, and not restricting the number of people able to benefit from them. This is delivered by regular training and communications about direct payments, PAs and Virtual Wallet, and best practice SCPM guidance about the personal budget setting process, and what a direct payment can be used for.

Digital: The Virtual Wallet, provided by People Places Lives (PPL), is a digital platform designed to facilitate Direct Payments (DP) and offer a supported account facility. It functions similarly to an online bank account, allowing DP holders to monitor and manage their payments. The platform also creates an audit trail that tracks all transactions, showing where payments come from and where they go. During Care Act Reviews, staff can access the platform to ensure that DPs are being used effectively to meet the recipient's needs. Promoting Virtual Wallet provides more transparency than designated bank accounts and enables more effective conversations about direct payment usage, as well as supporting live reporting of virtual wallet numbers and management information for marketplace decision making. Other digital initiatives include: Adding direct payment support information online, Coproduction and promotion of the Direct Payments e-Newsletter, supporting email address capture, use of web analytics, growing digital communications, data analysis of DP end reasons, enhancing SECAF/SPOG form data capture for decision making, consideration of AI support

tools, and e-signatures. Marketplace: Maintaining a marketplace for services in Hampshire is essential to supporting those with direct payments to have choice, particularly for direct payment recipients with personal assistants. Consideration of direct payment calculations and indicative personal assistant rates, legal obligations and the external market are all required to support the services which can be purchased using a direct payment.

Engagement

Consultation with direct payments recipients and carers is embedded in the approach via the Direct Payment Framework Partnership and its sub-groups:

There is an existing governance structure in place within Hampshire for direct payments co-production, with a framework partnership meeting overarching sub-groups for communications, a functions sub-group to identify technical issues or improvements to existing information platforms, and a direct payments user peer sub-group. These coproduced groups and sub-groups will provide direct payments assurance, check and feed back, capture queries and identify requests for change.

In addition there have been two Direct Payments Strategy Workshops (February 2025 and July 2025) which have utilised coproduction from members of the coproduction groups and sub-groups below to help identify and to feed back on the activities proposed for direct payments continuous improvement.

Hampshire Direct Payment Framework Partnership

The Framework Partnership provides senior management oversight for Personal Assistants in care development and direct payments across Hampshire. The partnership aims to design and develop a sustainable approach to direct payments for eligible Hampshire residents, ensuring cross-system and cross-department focus.

Peer Support Sub-Group

This sub-group provides those with lived experience a forum to discuss their experiences with direct payments and feed back into the other meetings.

DP/PA Communications Sub-Group

This sub-group aims to raise the profile of personal assistants in care and improve communication to direct payment users. Recent campaigns have increased social media followers and promoted the PA Finder website at recruitment events. The sub-group members coproduce the Direct Payment Newsletter, which launched in March 2022 and is distributed quarterly. It covers various direct payments and PA topics, seeking input from DP recipients regarding content.

Functions Sub-Group

This sub-group supports the development of functional solutions and alternative payment mechanisms and has recently overseen an update to the Hampshire PA Finder website including refreshed information and advice for PA employers.

Equalities considerations - Impact Assessment

Age

Impact on public	Neutral
Impact on staff	Neutral
Rationale	<p>Good Things Foundation research for 2025 indicates there is digital exclusion which is largely age-based. There is also a risk of difficulties in provision with eligibility and levels service change between Children's Services and Adults' Health and Care.</p> <p>Positives: Promoting direct payments and aligning practitioner understanding across Adults' and Children's will make them more accessible for people of all ages. The implementation of consistent procedures through Shared Services between CSD and AHC will improve the service transition from childhood to adulthood. Direct Payments Support Service provides telephone-based support as well as online information.</p> <p>Negatives: The strategy aims to provide new online pages for staff, other professionals, direct payment users, and carers which digitally excluded people of all ages will not be able to access; although this is mitigated by the availability of DPSS to support with queries via telephone amongst other methods. People of all ages who are digitally excluded may not be able to participate in Teams coproduction discussions People of all ages who are digitally excluded may not have access to virtual wallet to manage their direct payments, or access the PA Finder tool to help find a PA.</p> <p>Impact: Impact will be monitored through ongoing coproduction meetings, feedback channels, and data analysis to ensure equitable outcomes and inform future improvements</p>
Mitigation	

Disability

Impact on public	Positive
Impact on staff	Neutral
Rationale	<p>The split of Direct Payments users identified in July 2025 is Learning Disability 41.31%, Mental Health 1.46%, Older Adults 18.66%, Physical Disability 25.56%, Carers 11.23%; meaning around 2/3rds of all direct payments in Hampshire are used by individuals with either a learning or physical disability.</p> <p>The DP Strategy aim is "to support people with independent living and enable an equal opportunity to have a good life".</p> <p>Evidence from coproduction reflecting national concerns suggests there is a lack of confidence and understanding of direct payments, and that they can be difficult to administer. The direct payments coproduction groups have also fed back about difficulties in recruiting Personal Assistants, particularly</p>

	<p>in rural areas, with the alternative being directly commissioned care, reducing choice and likely at a higher cost.</p> <p>The lowest uptake is for Mental Health, most likely due to the nature of the condition making administering a direct payment more difficult.</p> <p>Positives:</p> <p>The proposed activities in the Strategy aim to improve support for individuals with direct payments, to improve the practice and knowledge of those offering direct payments, to provide more information online and improved digital communication, and to sustain the marketplace including promoting the PA Finder tool and peer support to aid finding Personal Assistants, all of which will support all direct payments users to address the identified concerns.</p> <p>DPSS will continue to provide accessible information offline (eg printed versions, easy read) for those who require it</p> <p>Continued coproduction governance and frequent meetings will ensure any concerns are raised directly with HCC.</p> <p>Negatives:</p> <p>Individuals with a disability may feel under pressure to take a direct payment</p> <p>The administrative processes required for direct payments, particularly Virtual Wallet, maybe be a barrier for people with a disability who are digitally excluded.</p> <p>Impact:</p> <p>Impact will be monitored through ongoing coproduction meetings, feedback channels, and data analysis to ensure equitable outcomes and inform future improvements</p>
Mitigation	

Gender Reassignment

Impact on public	Neutral
Impact on staff	Neutral
Rationale	<p>There is no specific impact of the direct payments strategy on gender reassignment.</p> <p>There are no targeted activities in the strategy based on gender reassignment.</p>
Mitigation	

Pregnancy and Maternity

Impact on public	Neutral
Impact on staff	Neutral

Rationale	<p>While there are no targeted activities, individuals who are pregnant or new parents may benefit from flexible care arrangements through direct payments. This can support wellbeing and independence during maternity.</p> <p>Negative:</p> <p>Staff who have been on maternity or paternity leave may be unaware of changes to process, practice or guidance in their absence</p> <p>Mitigation:</p> <p>To be covered by staff managers ensuring suitable information and training is available on return</p> <p>Impact:</p> <p>Impact will be monitored through ongoing coproduction meetings, feedback channels, and data analysis to ensure equitable outcomes and inform future improvements</p>
Mitigation	

Race

Impact on public	Neutral
Impact on staff	Neutral
Rationale	<p>According to Hampshire's JSNA, inclusion health groups—including ethnic minorities and LGBTQ+ individuals—may experience barriers to accessing care. The strategy's aim to grow the PA workforce and improve cultural competence can help address these disparities</p> <p>Positives:</p> <p>The aim of the direct payments strategy is to increase the number of direct payment users and personal assistants across all ethnic groups.</p> <p>Information is to be accessible and available in other languages.</p> <p>Mitigation</p> <p>Outreach to diverse communities to promote PA roles; Inclusion of cultural competence in PA training; Translation of materials and targeted recruitment campaigns</p> <p>Impact:</p> <p>Impact will be monitored through ongoing coproduction meetings, feedback channels, and data analysis to ensure equitable outcomes and inform future improvements</p>
Mitigation	

Religion or Belief

Impact on public	Neutral
Impact on staff	Neutral
Rationale	<p>According to Hampshire’s JSNA, inclusion health groups—including ethnic minorities and LGBTQ+ individuals—may experience barriers to accessing care. The strategy’s aim to grow the PA workforce and improve cultural competence can help address these disparities</p> <p>There may be a barrier for some individuals with different religions and cultural needs in employing a PA using a direct payment due to low availability of PAs with the same religious beliefs or cultural understanding as themselves.</p> <p>Positives:</p> <p>The aim of the direct payments strategy is to increase the number of direct payment users and personal assistants across all religious and cultural backgrounds, to provide greater choice and control over their care and support. If available, individuals from ethnic or religious minorities can select services that align with their cultural or religious practices.</p> <p>Negatives:</p> <p>There may be difficulties in recruiting PAs from a wide range of ethnic backgrounds to match need.</p> <p>Impact:</p> <p>Impact will be monitored through ongoing coproduction meetings, feedback channels, and data analysis to ensure equitable outcomes and inform future improvements</p>
Mitigation	

Sex

Impact on public	Neutral
Impact on staff	Neutral
Rationale	<p>The strategy’s aim to grow the PA workforce will help increase choice, including for individuals who prefer carers of the same sex for personal care tasks.</p> <p>Individuals may wish to recruit carers who understand their needs, including gender-specific health concerns. Individuals may prefer carers of the same sex for personal care tasks, especially in contexts involving intimate care.</p> <p>The aim of the direct payments strategy is to increase the number of direct payment users and personal assistants across sexes, to provide greater choice and control to individuals over their care and support.</p> <p>Impact:</p> <p>Impact will be monitored through ongoing coproduction meetings,</p>

	feedback channels, and data analysis to ensure equitable outcomes and inform future improvements
Mitigation	

Sexual Orientation

Impact on public	Neutral
Impact on staff	Neutral
Rationale	<p>According to Hampshire’s JSNA, inclusion health groups—including ethnic minorities and LGBTQ+ individuals—may experience barriers to accessing care. The strategy’s aim to grow the PA workforce and improve cultural competence can help address these disparities</p> <p>Positives:</p> <p>Individuals can select personal assistants or care providers who are respectful, affirming, and culturally competent—reducing the risk of discrimination or discomfort.</p> <p>Direct payments allow individuals to avoid those with prejudiced views, creating a safer and more supportive care environment.</p> <p>Individuals can design care that reflects their identity and lifestyle, which may not be adequately addressed in traditional care setting</p> <p>Negatives:</p> <p>Individuals may face subtle or overt discrimination when trying to recruit personal assistants.</p> <p>Guidance and support materials may not reflect the individual's needs or experiences, leading to feelings of exclusion or misunderstanding.</p> <p>If someone avoids traditional services due to past discrimination, they may become isolated if they struggle to find affirming support through direct payments.</p> <p>In some areas, it may be harder to find carers who are openly inclusive or trained in LGBTQ+ cultural competence</p> <p>Impact:</p> <p>Impact will be monitored through ongoing coproduction meetings, feedback channels, and data analysis to ensure equitable outcomes and inform future improvements</p>
Mitigation	

Marriage and Civil Partnership

Impact on public	Neutral
Impact on staff	Neutral
Rationale	There is no specific impact of the direct payments strategy on marriage & civil partnership.

	<p>There are no targeted activities based on marriage & civil partnership. Guidance on employing a spouse as a personal assistant is unchanged as a result of the strategy.</p> <p>Positives: Direct payments can help couples maintain independent living together, especially in older age or when one partner has care needs</p> <p>Negatives: There may be assumptions that a spouse or partner will take on care responsibilities, which could lead to unfair pressure or lack of formal support.</p> <p>Impact: Impact will be monitored through ongoing coproduction meetings, feedback channels, and data analysis to ensure equitable outcomes and inform future improvements</p>
Mitigation	

Poverty

Impact on public	Neutral
Impact on staff	Neutral
Rationale	<p>The strategy includes support services and digital tools to help individuals manage payments effectively, with offline options available for those facing financial or digital exclusion. The JSNA highlights that digital exclusion is more common in deprived areas and among older adults and disabled individuals. The strategy’s commitment to offline support and telephone-based services helps mitigate this risk.</p> <p>Positives:</p> <p>Direct payments allow individuals to choose cost-effective care options, potentially stretching limited resources further</p> <p>People in poverty may be employed as personal assistants by family or community members, creating local job opportunities</p> <p>Individuals can prioritize spending on services that meet their most urgent needs, rather than relying on one-size-fits-all provision</p> <p>With the right support, direct payments can help people maintain independence, access education or employment, and reduce reliance on institutional care.</p> <p>Negatives:</p> <p>Managing direct payments requires financial literacy, access to banking, and digital tools—barriers for many in poverty</p> <p>Without adequate support, individuals may mismanage funds, leading to debt or loss of care services.</p>

	<p>People in poverty may lack access to advisory services, advocacy, or peer support networks that help navigate the system.</p> <p>Direct payments may not cover all associated costs (e.g., recruitment, insurance, training), placing additional financial strain on low-income users.</p> <p>Online systems for managing payments may exclude those without internet access or digital skills.</p> <p>Impact: Impact will be monitored through ongoing coproduction meetings, feedback channels, and data analysis to ensure equitable outcomes and inform future improvements</p>
Mitigation	

Rurality

Impact on public	Positive
Impact on staff	Neutral
Rationale	<p>Hampshire Direct Payments Framework Partnership and its associated coproduction sub-groups have fed back concerns about lack of PAs to recruit across the county, but it is particularly difficult in rural areas due to population distribution. The JSNA identifies rural districts such as Test Valley and New Forest as having lower service access. The strategy's marketplace development and PA recruitment efforts are key to improving care options in these areas.</p> <p>The Marketplace activities in the strategy indicate an awareness of this issue and the following activities will reflect considerations of those in rural locations:</p> <ul style="list-style-type: none"> Development and oversight of the service marketplace in Hampshire to provide direct payment recipients with choice Development of direct payments data capture to support market shaping decisions Engagement with local colleges and universities to promote personal assistant in care as a career Training for personal assistant employers and potential employers Hampshire PA Finder website functionality and access Promotion of personal assistant tools and resources Monitoring the impact of micro-providers Developing peer support relationships and signposting <p>There are specific activities being discussed in the co-production groups to encourage coproduction in rural areas and the opportunity to capture data through the Securing Care and Funding and Support Planning Oversight Group apps to support the decision-making process for exceptional requests would include those requesting additional funding for PAs in rural areas.</p> <p>Positives:</p>

	<p>People in rural areas can use direct payments to tailor care locally, potentially using informal networks or community-based support where formal services are scarce.</p> <p>Hiring local personal assistants or micro-providers can stimulate rural employment and keep resources within the community.</p> <p>Direct payments may reduce the need to travel long distances to access centralized services, which is especially beneficial in areas with poor transport links.</p> <p>Negatives: Fewer care providers in rural areas can make it difficult to recruit personal assistants, especially with specific skills or cultural competencies.</p> <p>Travel time and mileage for carers may increase costs, which might not be fully covered by the direct payment budget.</p> <p>Poor broadband access and lower digital literacy can make it harder to manage payments, access support, or use online tools.</p> <p>Individuals may have less access to advice, advocacy, or peer support, making it harder to navigate the system or resolve issues. In isolated settings, there may be fewer checks and balances, increasing the risk of exploitation or poor-quality care.</p> <p>Impact: Impact will be monitored through ongoing coproduction meetings, feedback channels, and data analysis to ensure equitable outcomes and inform future improvements</p>
Mitigation	

Geographical Impact: All Hampshire

Equality Statement

Additional information:

None

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: 00922

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