

Name of proposal/policy	The introduction of the option of Pre-paid Cards for Direct Payments	Budget number (if applicable)	
Service area responsible	NASS	Cabinet meeting date	N/A
Name of completing officer	Chris Hodgson/Lisa Walsh/ Jolly James	Date EqIA created	May 2020
Approved by Director / Assistant Director	Anna Earnshaw	Date of approval	28/06/2020
Signed off by NCC Equalities Lead	Emma Gadsby	Date of sign off	28/06/2020

For sign off by the NCC Equalities Lead, email egadsby@northamptonshire.gov.uk or equalities@northamptonshire.gov.uk

The Equality Act 2010 places a 'General Duty' on all public bodies to have 'Due regard' to:

- Eliminating discrimination, harassment and victimisation
- Advancing equality of opportunity
- Fostering good relations

We do this by undertaking equality impact assessments (EqIAs) to help us understand the implications of policies and decisions on people with protected characteristics – EqIAs are our way of evidencing this.

All assessments must be published on the NCC equalities web pages. All Cabinet papers where an EqIA is relevant **MUST** include a link to the web page where this assessment will be published. To have your EqIA published, please contact equalities@northamptonshire.gov.uk

1) Description of current provision/policy and main beneficiaries/stakeholders

Direct Payments (DPs) are monetary payments made to individuals who request to receive one to meet some or all of their eligible care and support needs (Care Act, 2014). Direct payments have been in use in adult care and support since the mid-1990s and they remain the Government's preferred mechanism for personalised care and support. However, there is an opportunity to transform the authorities' current Direct Payments (DP) / Holding Accounts (HA) method to a Pre-Paid card system.

Currently DPs are managed in two ways:

1. The customer – or a responsible person on their behalf (usually a family member) – manages the account themselves, receives funding into their own nominated bank account, makes all care related payments from that account and is responsible for keeping records and sending them every six months to NCC.
2. The account is managed by Personal Budget Support Services (PBSS), a department in NASS. A Holding Account (HA) is used by PBSS and all of the financial/reporting functions are delivered by PBSS from this single bank account.

Currently, customers who are in receipt of direct payments are required to set up a separate bank account to receive the payments and are restricted to use the funds as agreed within their package of care. The customer is required to provide bank statements and receipts twice annually to the authority to evidence that the funds have been used in the agreed manner and to evidence they have also made their agreed personal contributions to the account. As these accounts are manually reconciled half yearly, when customers do not provide their evidence in time or some of the evidence is missing additional processes take place such as the 'DP Chase Process (chasing customers for evidence)' and 'DP Suspension Process (ultimately suspending payments)'.

This further leads to a clawback of excess payment made to these accounts. The current Direct Payments/ Holding Accounts process is heavily labour intensive, requiring a high amount of time/resource. NASS currently have backlog of around 1000 Direct Payment (DP) returns that require processing. These are made up of 555 Direct Payment Reviews and 446 Holding account (HA) Reviews. There is currently a backlog of outstanding 'clawbacks' of £1.39million (DP £699,200 & DP HA £688,822) which is a direct result of the current process of managing/ reviewing payments. Presently, 4 x FTE G grade employees have been on fixed term contracts to work in the Monitoring and Payments (MAP) Team, who are tasked with working solely on clearing the DP and HA review backlog per week.

2) Description of proposal under consideration/development

Prepaid cards are similar to bank direct debit cards and are straightforward in their use. The benefits are increased flexibility for both user and the council. The card is backed by an account that allows the user to withdraw cash (if allowed), pay bills and set up direct debits. The account cannot go overdrawn.

Prepaid cards have the ability to facilitate real time monitoring of these accounts to prevent/reduce misuse and fraud by identifying potential inappropriate Direct Payments use earlier and allow action to be taken quickly. Prepaid cards can improve process efficiencies within the Adult Social Care Payment Services and reduce clawbacks on Direct Payments. The case for these prepaid cards for council business has been well made on a national level and is currently in use with our LGSS partners in Cambridge and Peterborough.

3) Data used in this Equality Impact Assessment (general population data where appropriate but each EqIA should contain information on people who use the service under consideration – if this is not applicable to your proposal then you probably do not need to do an EqIA)

Data Source (include link where published) – quantitative or qualitative	What does this data tell us?
<p>The analysis has been performed with the following assumptions:</p> <ul style="list-style-type: none"> • New customers are proposed to be enrolled to prepaid cards rather than a standard Direct Payment (DP) or Holding Account (DPHA) However, this service will be offered as an alternative. • Pre-paid cards will be offered as an alternative and will not be mandatory • The latest information indicates that there were 153 new DP recipients over the last 12 months (who had not received a DP over the previous 2 years). It is assumed that 160 new customers are to be enrolled in the year 2020-21 on an average of 12 customers a month having a weekly DP or DPHA and 16 customers with an annual DP/DPHA. • All the 770 DPHA Customers are expected to be enrolled to the pre-paid cards option as the DP Holding Accounts process is dealt thoroughly by NCC only. The customers will not see any impact due to the change. • 50% of the existing 1070 DP customers are expected to be moved to the pre-cards option at the rate of 100 per month. The customers will be contacted individually to check if they want to opt for the new service. 	<p>The existing DP and DPHA customer base is 1968, out of which 52% are Female and 48% are Male. The age range for the existing customer base 18-64 – 76% and 65+ – 21%. Their Primary Care needs are majorly around Learning Disability Support (43%), Personal Care support (20%), Mental Health Support (7%) and Physical Disability support (29%).</p>

4) Please give details about planned consultation or engagement with communities and other stakeholders that are likely to be affected by the policy/decision/service change. Contact the Consultation, Equalities & Accessibility Team (ceat@northamptonshire.gov.uk) for advice or complete the online form with details of your consultation/engagement activity.

If you are not carrying out any consultation or engagement activity, please provide reasons why you think this is not necessary.

A consultation exercise will not be taking place as a stakeholder engagement exercise was conducted in 2018. The information and opinion gathered at this time is still relevant and as the use of pre-paid cards will be an option, not mandatory, a policy change is not required. However, each customer will be contacted individually to check if they want to opt for the new service.

5) If consultation or engagement has been carried out in the past, please provide details. If so, what were their views and how have their views influenced the work to date?

In January 2018, Northamptonshire Adult Social Services (NASS) completed a review into one aspect of Direct Payments. It reviewed how the Council works out the rates that it pays in Direct Payments (DP) for those people who employ Personal Assistants (PA) to meet their care support needs. As a result of this review, some proposals were devised which were subject to a consultation carried out between the 1st May 2018 and 30th June 2018.

At the same time NASS took the opportunity to concurrently engage and seek the views of DP customers and other stakeholders on how the Council pays and monitors Direct Payments and the potential implications of introducing pre-payment cards.

A more detailed analysis of the findings of the exercise can be found here;

https://www.northamptonshire.gov.uk/councilservices/council-and-democracy/have-your-say/Documents/Current%20consultations/2017/DP_Monitoring_and_PPC_Engagement_Analysis_Report_2018_v1.0_FINAL.pdf

A total of 49 questionnaires were submitted, 21 individuals attended an event. There was 1 written submission, and an officer attended Healthwatch’s Task and Finish group, of which there were 5 attendees. Responses were mostly received from employers of PAs, NASS customers, and their family/unpaid carers. Approximately 3 out of 4 of these respondents currently use their Direct Payment to employ a Personal Assistant.

Most respondents (43.8%) disliked the idea of having a pre-payment card for a Direct Payment, with 28.1% being in favour. Whilst some felt it would be quick, easy, and that it would save money and that there be no returns to send to the Council, others felt the scheme would be expensive and would be a waste of public resources, and that other councils had experienced high costs for set up and maintenance. Respondents were concerned about potential abuse of the system, and that it could confuse customers, especially older people.

The majority of respondents (45.2%) said they were against the idea of having a pre-payment card if they were available with 22.6% being in favour. On the whole respondents said they felt the current system worked and there was not a need to bring in another form of payment process, and that it would be a waste of money, although some felt it would save them time especially when processing their paperwork and submitting their receipts. A total of 48.4% said they had worries or concerns about having a pre-payment card instead of a separate bank account, with 22.6% saying they did not.

Protected characteristics as set out in the Equality Act 2010

6) Based on the above information, what is the likely impact on the following groups? Please explain why you have made this assessment. If you are unsure, set out what you will do to get enough information to make an assessment.

Sex	Impact and explanation	Neutral Explanation: The existing customer base – 52% are Females and 48% are Males. However, there is no reason to suggest this will have a particular impact upon people due to their Sex
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	Mitigations/actions	The proposed service is offered as an alternative to their standard direct payment and the customers will have the option for choosing to opt in to the service.
Gender Reassignment	Impact	Neutral Explanation: There is no reason to suggest this will have a particular impact upon people due to gender reassignment.
	Mitigations/actions	The proposed service is offered as an alternative to their standard direct payment and the customers will have the option for choosing to opt in to the service.
Age	Impact	Neutral Explanation: The age range for the existing customer base: 18-64 – 76% 65+ – 21% Just over three-quarters of potentially affected customers are working age adults but as this is an opt-in service, there will be no particular impact due to age.
	Mitigations/actions	The proposed service is offered as an alternative to their standard direct payment and the customers will have the option for choosing to opt in to the service.
Disability	Impact	Positive Explanation: This proposal impacts upon residents who have care and support needs
	Mitigations/actions	Prepaid cards are similar to bank direct debit cards and are straightforward in their use. The benefits should provide increased flexibility for the service user and promote independence and choice offering a range of payment options. The proposed service is offered as an alternative to their standard direct payment and the customers will have the option for choosing to opt in to the service.
Race & Ethnicity	Impact	Neutral Explanation: There is no reason to suggest this will have a particular impact upon people due to race and ethnicity.
	Mitigations/actions	The proposed service is offered as an alternative to their standard direct payment and the customers will have the option for choosing to opt in to the service.
Sexual Orientation	Impact	Neutral Explanation: There is no reason to suggest this will have a particular impact upon people due to their sexual orientation.
	Mitigations/actions	The proposed service is offered as an alternative to their standard direct payment and the customers will have the option for choosing to opt in to the service.
Religion or Belief (or No Belief)	Impact	Neutral

		Explanation: There is no reason to suggest this will have a particular impact upon people due to their religion or belief.
	Mitigations/actions	The proposed service is offered as an alternative to their standard direct payment and the customers will have the option for choosing to opt in to the service.
Pregnancy & Maternity:	Impact	Neutral Explanation: n/a
	Mitigations/actions	n/a

Cross-cutting considerations

7) Based on the above information, what is the likely impact on the following groups? Please explain why you have made this assessment. If you are unsure, set out what you will do to get enough information to make an assessment.		
Human Rights – relevant articles: <i>Article 14 – Protection from discrimination (e.g. NCC must not discriminate against one or more protected groups in relation to other rights in the Human Rights Act)</i>	Impact	Neutral Explanation: The proposed service is offered as an alternative to their standard direct payment and the customers will have the option for choosing to opt in to the service.
	Mitigations/actions	
Rural isolation	Impact	Neutral Explanation: There is no reason to suggest this will have a particular impact upon people due to their area of residence. However, this is an evolving document and will be updated once further information is received
	Mitigations/actions	The proposed service is offered as an alternative to their standard direct payment and the customers will have the option for choosing to opt in to the service.
Socio-economic exclusion	Impact	Unsure Explanation: There is no reason to suggest this will have a particular impact upon people due to their Socio-economic status
	Mitigations/actions	As above
Health and wellbeing considerations, for example:	Impact	Neutral Explanation:
	Mitigations/actions <i>(Can you identify any mitigating actions that</i>	Public Health have assessed that a full Health Impact Assessment is not required.

<ul style="list-style-type: none"> • <i>Health behaviours (healthy eating, physical activity, smoking, alcohol)</i> • <i>Family, friends and community (social isolation, community safety, mental health, family support)</i> • <i>Environment (housing standards, fuel poverty, air pollution, green spaces)</i> • <i>Work and education (employment, working conditions, income)</i> • <i>Transport (active travel, public transport, road injury risk, traffic management)</i> • <i>Quality and access to care</i> 	<p><i>can be taken to reduce a negative impact or any actions that can improve a neutral or positive impact?)</i></p> <p>Note: Depending on the scale of the impact identified, there may be a recommendation for a full Health Impact Assessment to be completed.</p>	
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PART B – if you are undertaking any further work before the decision on this policy or service change is made, please complete Part B and then make a final assessment based on this additional information

REMOVE ALL GUIDANCE IN ITALICS ONCE COMPLETED

1) Consultation, follow up data and information gathered from actions identified above	
	<p>What does this information tell us?</p>

Protected characteristics as set out in the Equality Act 2010 – see Part A for explanations and guidance

2) Based on the above information, what is the likely impact on the following groups? Please explain why you have made this assessment. If you are still unsure, please explain what you plan to do in future to address this.

Sex <i>Refer back to Part A for detail</i>	Impact	
	Mitigations/actions	
Gender Reassignment <i>Refer back to Part A for detail</i>	Impact	
	Mitigations/actions	
Age <i>Refer back to Part A for detail</i>	Impact	
	Mitigations/actions	
Disability <i>Refer back to Part A for detail</i>	Impact	
	Mitigations/actions	
Race & Ethnicity <i>Refer back to Part A for detail</i>	Impact	
	Mitigations/actions	
Sexual Orientation <i>Refer back to Part A for detail</i>	Impact	
	Mitigations/actions	
Religion or Belief (or No Belief) <i>Refer back to Part A for detail</i>	Impact	
	Mitigations/actions	
Pregnancy & Maternity <i>Refer back to Part A for detail</i>	Impact	
	Mitigations/actions	

Cross-cutting considerations – see Part A for explanations and guidance

3) Based on the above information, what is the likely impact on the following groups? Please explain why you have made this assessment. If you are still unsure, please explain what you plan to do in future to address this.

Human Rights (Please see articles in the toolkit for more information) <i>Refer back to Part A for detail</i>	Impact	
	Mitigations/actions	
Rural isolation <i>Refer back to Part A for detail</i>	Impact	
	Mitigations/actions	
Socio-economic exclusion <i>Refer back to Part A for detail</i>	Impact	
	Mitigations/actions	
Health and wellbeing considerations	Impact	

<i>Refer back to Part A for detail</i>	Mitigations/actions	
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4) Final impact analysis (taking the findings from Part B into account) – including review date if required

The following mitigating actions will be undertaken:-

The reasons why alternative suggestions are not possible are:-