

## **ASC Debt Recovery Policy 2022/23 Equality Impact Analysis: (EqIA)**

### **Introduction**

**Directorate:** People (Adults)

**Completed by:** Marc Gadsby

**Approved by:**

**Date of approval:**

**The Equality Act 2010 places a ‘General Duty’ on all public bodies to have ‘due regard’ to:**

- Eliminating discrimination, harassment and victimisation and any other conduct prohibited under the Act.
- Advancing equality of opportunity between those with ‘protected characteristics’ and those without them.
- Fostering good relations between those with ‘protected characteristics’ and those without them.

**This Equality Impact Assessment evidences how the Council meets the responsibilities outlined above with regards to the update of the Financial Charging and Contributions Policy.**

## General information about the proposal

This Equality Analysis relates to the update to the ASC Debt Recovery Policy 2022/23. Please see the ASC Debt Recovery Policy 2022/23, for more details on the detail of the policies.

This Equality Analysis focuses only on the impact of updates and changes to the policy. These policy changes are to update the policy to reflect current practice.

## Evidence (Consideration of Data and Information)

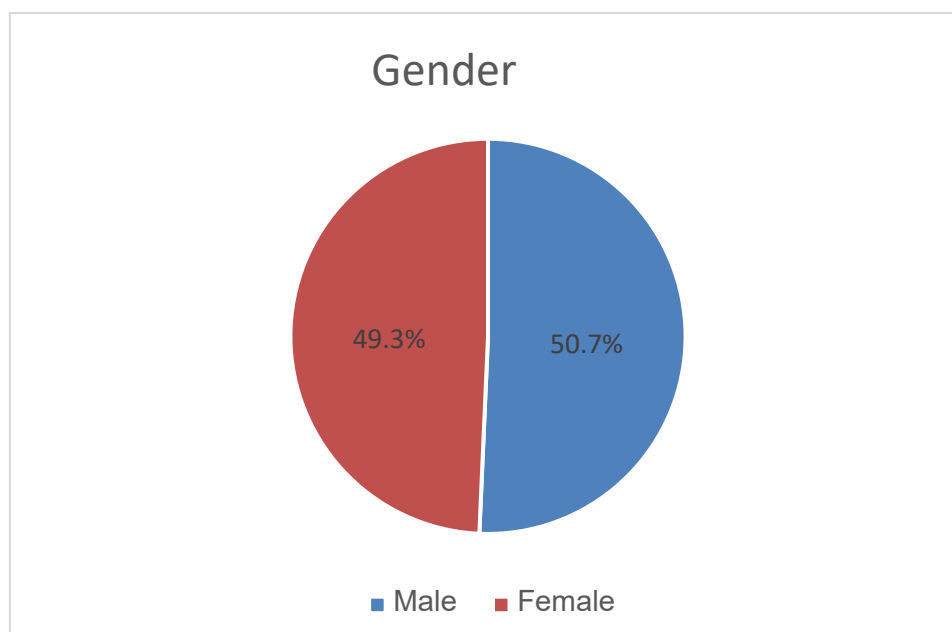
Slough resident information<sup>1</sup> is taken from the 2011 Census and Public Health for Berkshire Observatory: [Berkshire Observatory – Slough – Population & Demographics](#) and the Office for National Statistics: [Local Area Report for areas in England and Wales - Nomis \(nomisweb.co.uk\)](#)

The data and information is based on the Slough population as a whole, as detail on relevant groups in receipt of care and support services is not consistently available.

There is no foreseen impact of the proposed updates to the policy.

## Gender

*As of 2020.*

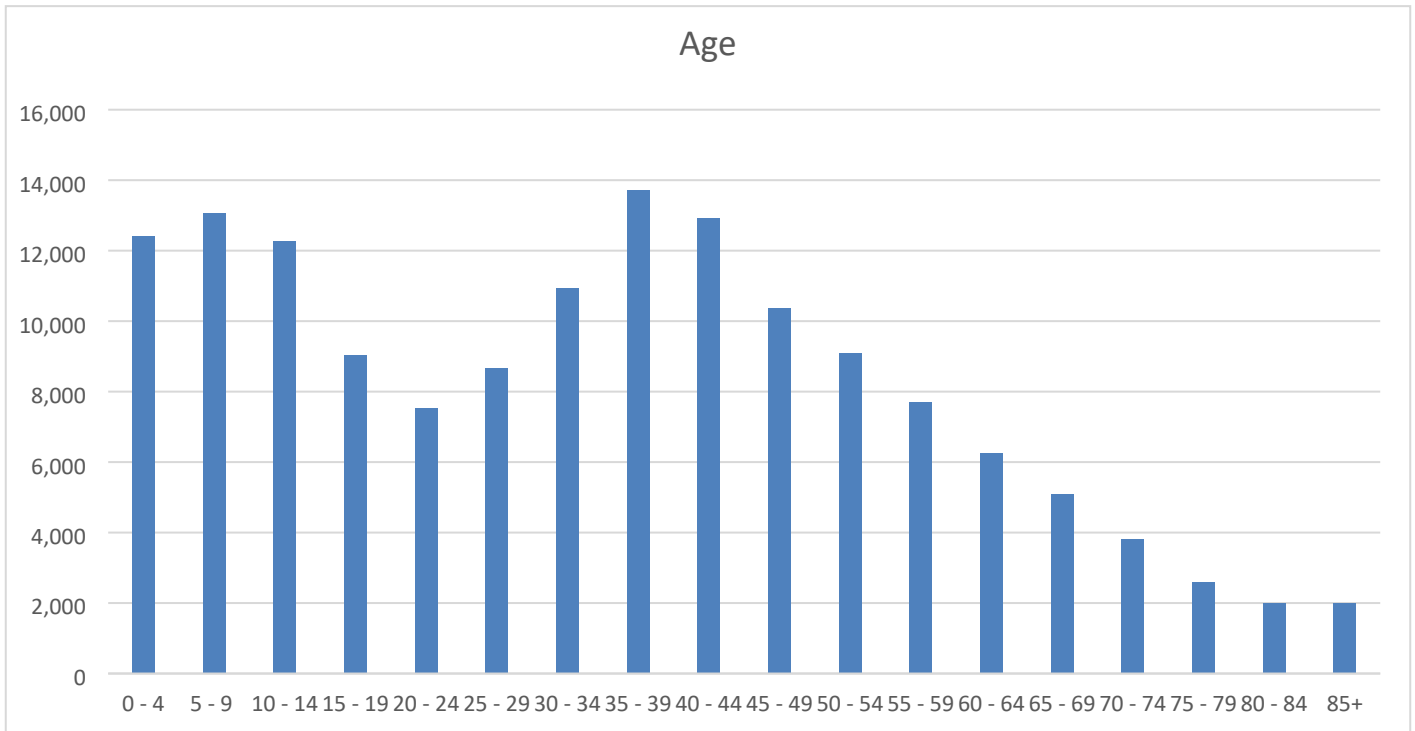


Gender	Population	Total %
Female	73,748	49.3
Male	75,829	50
<b>Grand Total</b>	<b>149,577</b>	<b>100</b>

## Age

<sup>1</sup> It should be noted that the number of carers known to adult social care is much smaller than the number of carers overall.

As of 2020.

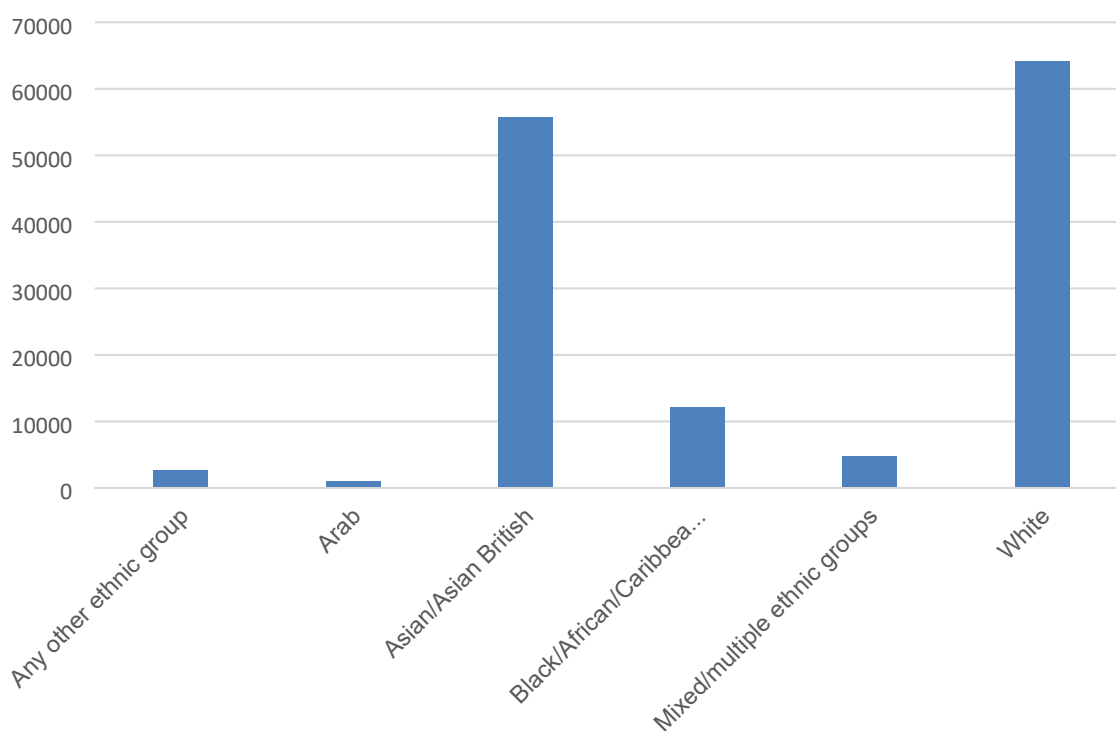


Age Groups	Population	Total %
0 - 4	12,415	8.3
5 - 9	13,070	8.7
10 - 14	12,265	8.2
15 - 19	9,027	6
20 - 24	7,542	5
25 - 29	8,674	5.8
30 - 34	10,950	7.3
35 - 39	13,715	9.2
40 - 44	12,919	8.6
45 - 49	10,383	6.9
50 - 54	9,098	6.1
55 - 59	7,704	5.2
60 - 64	6,258	4.2
65 - 69	5,105	3.4
70 - 74	3,825	2.6
75 - 79	2,610	1.7
80 - 84	2,009	1.3
85+	2,008	1.3
<b>Grand Total</b>	<b>14,9577</b>	<b>100</b>

**Ethnic Background**

As of 2011.

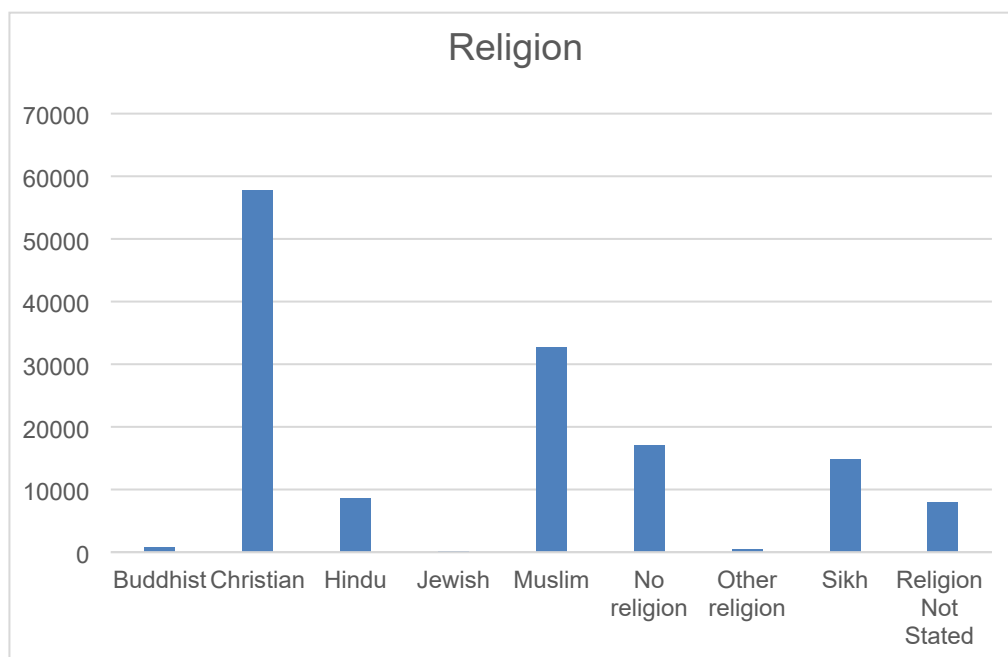
### Ethnicity



Ethnicity	Population	Total %
African	7,548	5.38
Bangladeshi	549	0.39
Caribbean	3,096	2.21
Chinese	797	0.57
English/Welsh/Scottish/Northern Irish/British	48,401	34.52
Gypsy or Irish Traveller	220	0.16
Indian	21,922	15.64
Irish	1,607	1.15
Other Asian	7,560	5.4
Other Black	1,471	1.05
Another ethnic group	3,582	2.55
Other Mixed	1,055	0.75
Other White	13,825	9.86
Pakistani	24,869	17.74
White and Asian	1,429	1.02
White and Black African	607	0.43
White and Black Caribbean	1,667	1.19
<b>Grand Total</b>	<b>140,205</b>	<b>100</b>

### Religion or Belief

As of 2011.

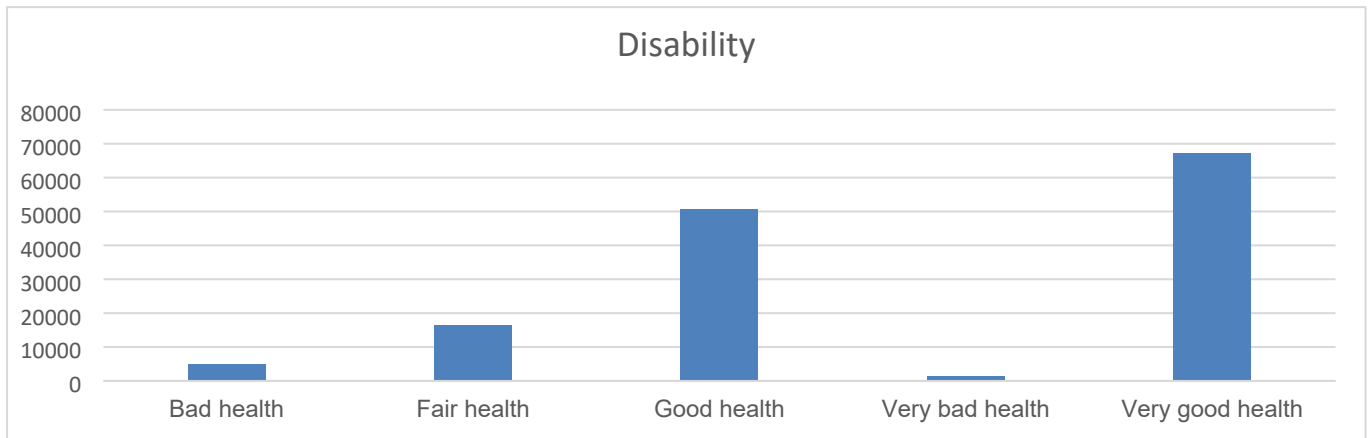


Religion	Population
Buddhist	743
Christian	57,726
Hindu	8,643
Jewish	87
Muslim	32,655
No religion	17,024
Other religion	482
Sikh	14,889
Religion Not Stated	7,956
<b>Grand Total</b>	<b>140,205</b>

## **Disability**

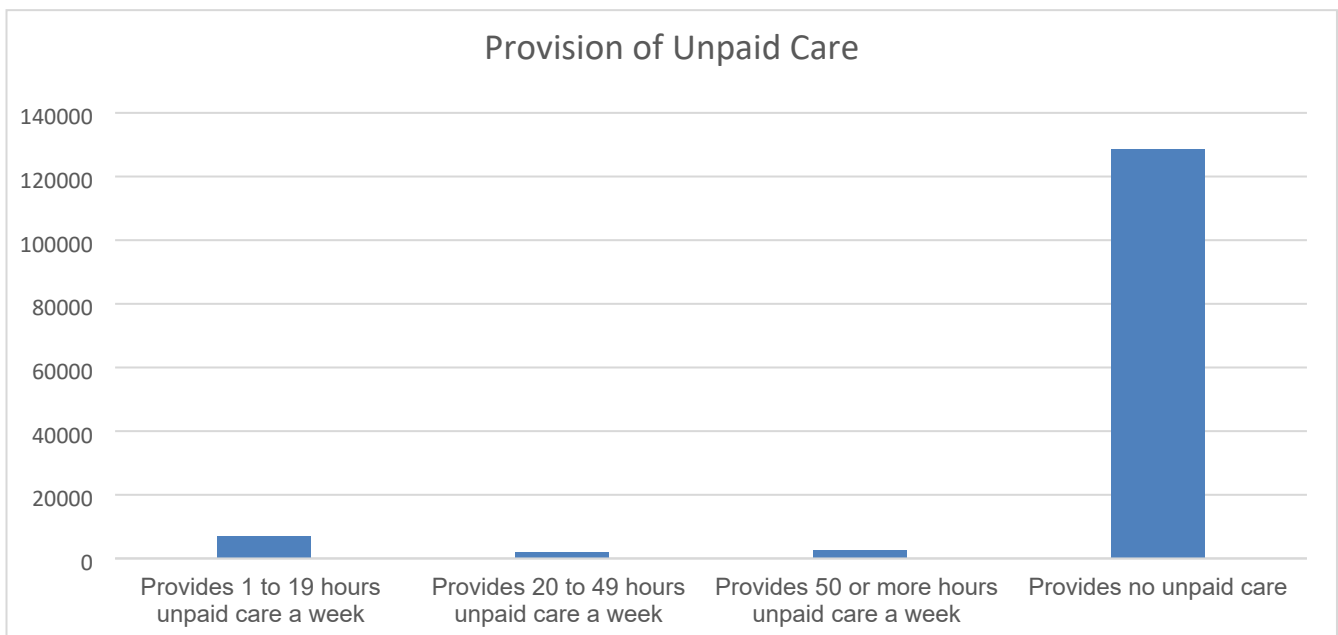
As of 2011.

In the 2011 Census, 9,322 residents between the ages of 16-64 reported living with a physical disability. Over 1,350 people were reported to be living with a severe mental health problem. There are an estimated 2,590 people living with sight loss in Slough. 290 people are living with severe sight loss (blindness). 2,696 adults under the age of 65 live with a moderate to severe hearing impairments (more have a profound impairment). Hearing impairments in younger adults in Slough is expected to increase by 20% over the next ten years. Also, 4.07% of over 65s have been recorded by their GPs as living with dementia.



Disability Status	Population
Bad health	4,906
Fair health	16,288
Good health	50,464
Very bad health	1,391
Very good health	67,156
<b>Grand Total</b>	<b>140,205</b>

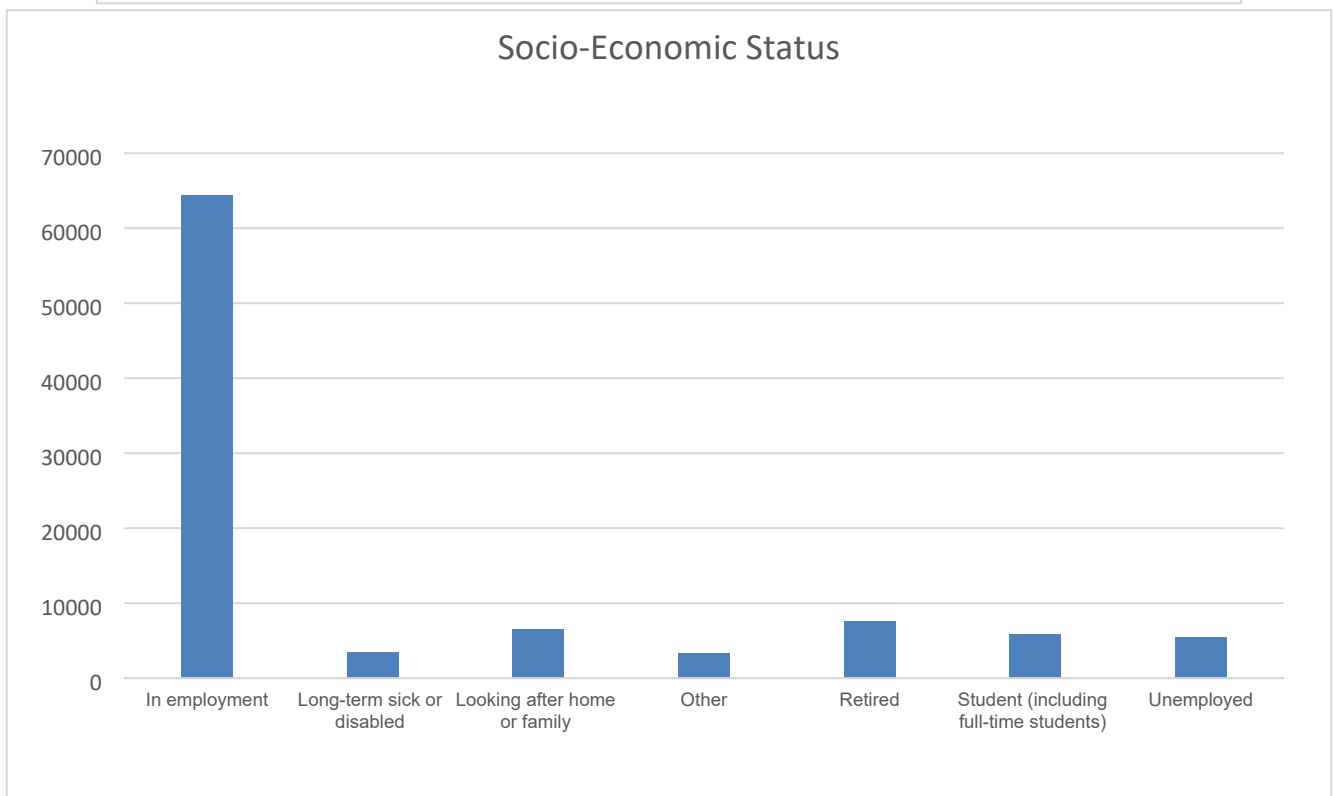
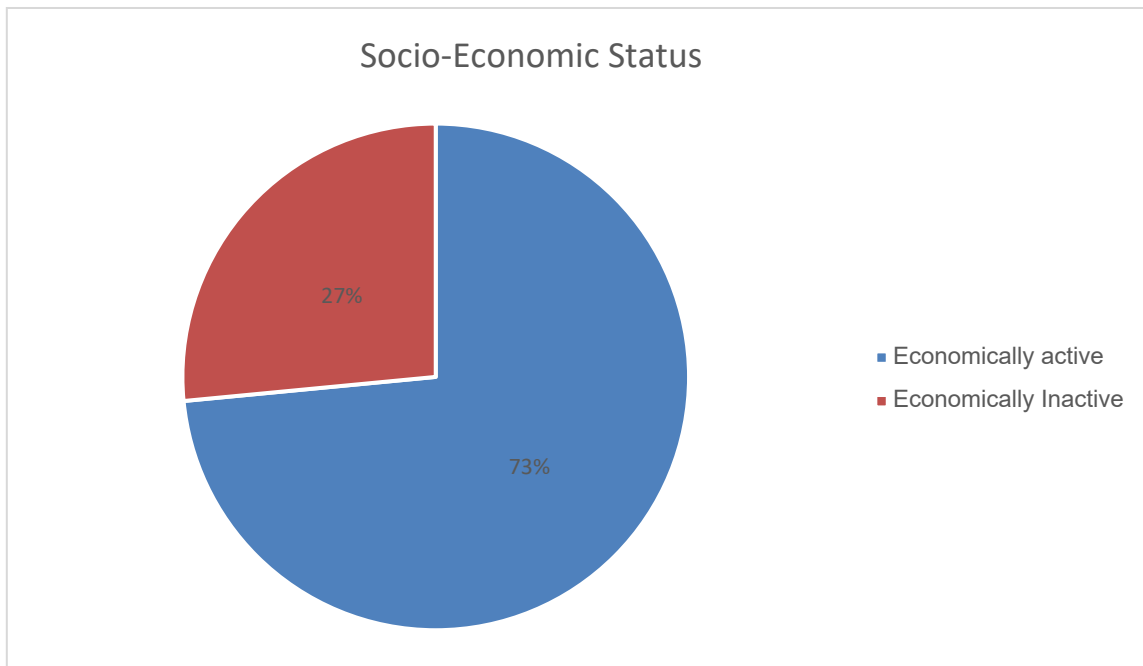
A person is a provider of unpaid care if they look after or give help or support to family members, friends, neighbours, or others because of long-term physical or mental ill health or disability, or problems related to old age. This does not include any activities as part of paid employment. No distinction is made about whether any care that a person provides is within their own household or outside of the household, so no explicit link can be made about whether the care provided is within the household who had poor general health or a long-term health problem or disability.<sup>2</sup>



<sup>2</sup> [Berkshire Observatory – Slough – Population & Demographics](#)

**Provision of Unpaid Care****Population**

Provides 1 to 19 hours unpaid care a week	7,058
Provides 20 to 49 hours unpaid care a week	1,977
Provides 50 or more hours unpaid care a week	2,591
Provides no unpaid care	128,579

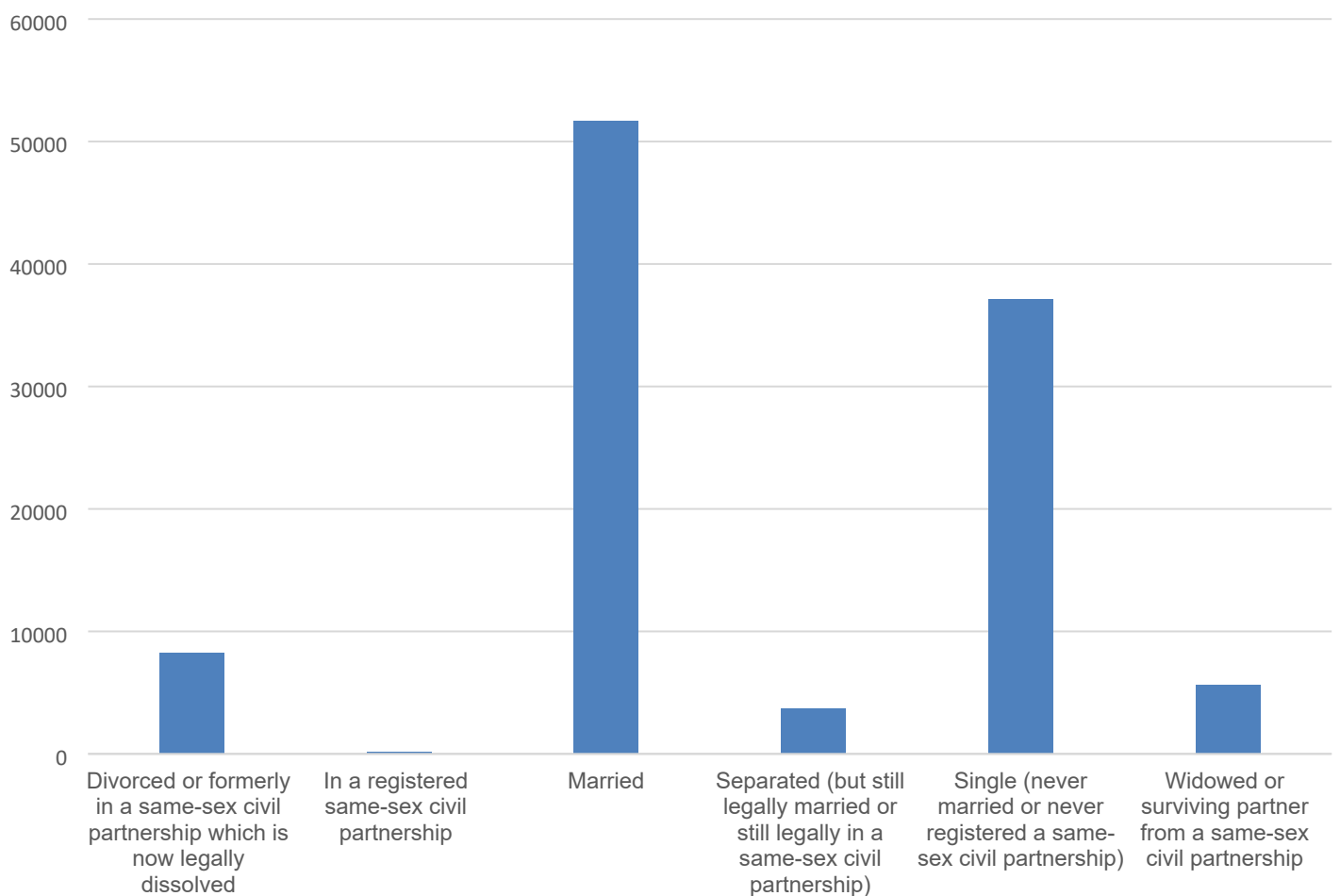
**Grand Total****140,205****Socio-Economic Status***As of 2011.*

Socio-Economic Status	Population
Employee: Full-time	43,610
Employee: Part-time	11,886
Self-employed	8,926
Long-term unemployed	2,121
Unemployed: Age 16 to 24	1,303
Unemployed: Age 50 to 74	865
Unemployed: Never worked	1,014
Student (including full-time students)	5,813
Long-term sick or disabled	3,388
Looking after home or family	6,555
Retired	7,517
Other	3,366
<b>Grand Total</b>	<b>96,364</b>

### Marital and Civil Partnership Status

As of 2011.

Marital and Civil Partnership Status





<b>Relationship Status</b>	<b>Population</b>	<b>Total %</b>
Divorced or formerly in a same-sex civil partnership which is now legally dissolved	8,271	7.76
In a registered same-sex civil partnership	135	0.13
Married	51,713	48.49
Separated (but still legally married or still legally in a same-sex civil partnership)	3,721	3.49
Single (never married or never registered a same-sex civil partnership)	37,159	34.84
Widowed or surviving partner from a same-sex civil partnership	5,646	5.29
<b>Grand Total</b>	<b>106,645</b>	<b>100</b>

### **Sexual Orientation**

Information on sexual orientation is not available in sufficient detail to draw meaningful comparisons.

### **Gender Reassignment**

Information on gender reassignment is not available in sufficient detail to be able to draw meaningful comparisons.

### **Pregnancy and Maternity**

Information on pregnancy and maternity are not available in sufficient detail to be able to draw meaningful comparisons.

## **Assessing the impact of the updates to the Financial Charging and Contributions Policy on People of Slough with Health and Social Care Needs**

Financial Charging and Contributions of clients towards their care costs is usual practice across the country and is provided for in relevant legislation. Detail of this requirement and how Slough complies with this requirement is laid out in the ASC Debt Recovery Policy 2022/23. The overarching principle of charging for care and support is that people should only be required to pay what they can afford. People will be entitled to financial support based on a means-tested financial assessment and some will be entitled to free care. The framework is therefore based on the following principles:

- Possible debts must be discussed with the person or their representative. The Council will give its customers a variety of options to discuss payment of their accounts: by telephone to the dedicated Financial Assessment team, by email, in writing or through web forms on the web site, and face to face at Observatory House.
- The Council must act reasonably and will review the appropriateness of each recovery option based on what is known about the customer's circumstances, their ability to pay, their past payment history, their mental capacity or any other physical health or age related limitations and the requirement to recover outstanding monies in a timely and efficient manner.
- Arrangements for debt repayments should be agreed between the relevant parties. And repayments must be affordable.
- Where appropriate, the Council will direct the customer to sources of debt and benefits advice.
- Court action should only be considered after all other reasonable avenues have been exhausted.

	<b>Positive</b>	<b>Negative</b>	<b>Neutral</b>	<b>Considering the above information and evidence, describe the impact this proposal will have on the following groups?</b>
<b>Age</b> (All age groups)	Positive impact in that the policy will ensure consistent decision-making taking account of specific circumstances for vulnerable service users.	Potential for negative impact if the change of policy leads to the Council taking more action to recover debt than it has in the past.	All people have increased clarity and visibility over the approach in Slough to debt recovery due to the updated policy.	The 2020 census information shows us that the age breakdown of Slough residents, aligned broadly with the age of users of specific ASC services, is as follows: <b>Age 0-19:</b> 46,777 <b>Age 20-64:</b> 87,243 <b>Age 65+:</b> 15,557
<b>Disability</b> (Physical, learning difficulties, mental health, and medical conditions)	Positive impact in that the policy will ensure consistent decision-making taking account of specific circumstances for vulnerable service users.	No positive or negative impact.	All people have increased clarity and visibility over the approach in Slough to debt recovery due to the updated policy.	In the 2011 Census, 9,322 residents between the ages of 16-64 reported living with a physical disability. Over 1,350 people were reported to be living with a severe mental health problem.
<b>Sex</b>	No positive or negative impact.	No positive or negative impact.	All people have increased clarity and visibility over the approach in Slough to debt recovery due to the updated policy.	The 2020 census information shows us that the gender balance is relatively equal in Slough residents. However, Carers UK, provided a Policy Briefing in 2019 stating 58% of carers were female and 42% were male. ASC services provide support to both Slough residents requiring support and their carers. Therefore, any proposed change that has a direct impact on the experience of carers, is likely to impact women more than men.
<b>Gender reassignment</b>	Insufficient information to identify any impact.	Insufficient information to identify any impact.		Information on gender reassignment is not available in sufficient detail to be able to draw meaningful comparisons.
<b>Marriage and civil partnership</b>	No positive or negative impact.	Potential for negative impact if the change of policy leads to the Council taking more action to recover debt than it has in the past	All people have increased clarity and visibility over the approach in Slough to debt recovery due to the updated policy.	In the 2011 Census, 69,486 of residents had either divorced or formerly in a same-sex civil partnership which is now legally dissolved, been in a registered same-sex civil partnership, married, separated or has been widowed or surviving partner from a same-sex civil partnership

		for couples that have been jointly assessed.		
<b>Religion or philosophical belief</b>	Positive impact in that the policy will ensure consistent decision-making taking account of specific circumstances for vulnerable service users	Potential negative impact if Religious groups are not able to communicate due to language challenges	All people have increased clarity and visibility over the approach in Slough to debt recovery due to the updated policy.	In the 2011 census, there is representation within 8 religious groups across the Slough population.
<b>Ethnicity</b>	Positive impact in that the policy will ensure consistent decision-making taking account of specific circumstances for vulnerable service users	Potential negative impact if ethnic groups are not able to communicate due to language challenges.	All people have increased clarity and visibility over the approach in Slough to debt recovery due to the updated policy.	In the 2011 Census, 91,804 people represented ethnic backgrounds that were not English/Welsh/Scottish/Northern Irish/British and could have language barriers.
<b>Sexual orientation</b>	Insufficient information to identify any impact	Insufficient information to identify any impact		Information on sexual orientation is not available in sufficient detail to be able to draw meaningful comparisons.
<b>Pregnancy and maternity</b>	Insufficient information to identify any impact	Insufficient information to identify any impact		Information on pregnancy and maternity are not available in sufficient detail to be able to draw meaningful comparisons.
<b>Socio-economic</b>	Potential positive impact as the policy will ensure consistent decision-making taking account of individual circumstances, including ability to pay.	Potential negative impact if more recovery action is taken, however individual circumstances will be taken into account.	All people have increased clarity and visibility over the approach in Slough to debt recovery due to the updated policy.	The 2011 census information shows us that around 20% of Slough residents are out of work (not including students or those retired).  All community provision for adults with support needs under the Care Act (2014) is subject to financial assessment, in line with the Financial Charging and Contributions Policy.

## Impact Analysis and Action Plan

Recommendation	Key activity	Progress milestones including target dates for either completion or progress	Officer responsible	Progress
1. The updated ASC Debt Recovery Policy is implemented, and practice reflects the policy detail	Policy is agreed and implemented  Social Care and Financial Assessment team are familiar with the policy and act in accordance to it	Alignment of practice to policy kept under review	MG	Ongoing
2. Collect additional data in the future to monitor impact of the policy on the ASC cohort specifically.	Collate and clean data relating to the ASC cohort for the relevant groups.	Complete set of data for relevant groups for the ASC cohort.	MG	Ongoing
3. On completion of action 2, monitor any further impact on age groups who could be disproportionately affected by the implementation of the policy and ensure information is available people of all ages.	Monitor any further impact on age groups who could be disproportionately affected.	Impact of the policy on age groups monitored and updated following data collection.	MG	Ongoing
4. On completion of action 2, monitor any further impact on Marriage and Civil Partnership groups who could be disproportionately affected by the implementation of the policy,	Monitor any further impact on Marriage and Civil Partnership groups who could be disproportionately affected and ensure effective communication is in place as appropriate.	Impact of the policy on Marriage and Civil Partnership groups monitored and updated following data collection.	MG	Ongoing
5. On completion of action 2, monitor any further impact on Ethnic groups who could be disproportionately affected by the implementation of the policy due to potential language barriers,	Monitor any further impact on Ethnic groups who could be disproportionately affected and ensure consideration of language requirements are in place as appropriate.	Impact of the policy on Ethnic groups monitored and updated following data collection.	MG	Ongoing
6. On completion of action 2, monitor any further impact on Socio-Economic groups who could be disproportionately affected by the implementation of the policy.	Monitor any further impact on Socio-Economic groups who could be disproportionately affected	Impact of the policy on Socio-Economic groups monitored and updated following data collection.	MG	Ongoing
7. Ensure there are effective communication methods in place to address learning disabilities, vulnerability and language barrier	Ensure there is effective communication in place across adult social care to be able to	Effective communication with all clients.	MG	Ongoing



## **Conclusion**

As a result of performing the EqlA, there is no foreseen negative impact on any groups of people who share a protected characteristic under the Equality Act 2010.

## **Monitoring**

Have monitoring processes been put in place to check the delivery of the above action plan and impact on equality groups?

Yes?

No?

Describe how this will be undertaken:

No foreseen impact due to this update to policy, and therefore no monitoring processes to be put in place.