

Appendix F – Equality Impact Assessment

Name and brief description of proposal / policy / service being assessed

Pricing of residential and nursing care services for 2014/2015 onwards.

This assessment considers proposals for fees to be paid for residential and nursing care services in the City for the years 2014/15 to 2017/18. This includes the proposal to award a 1% inflationary increase for fees in 2014/15 (applicable to all packages over £650 per week).

The proposed pricing is based on the findings of a 'Fair Price for Care' review undertaken on behalf of the City Council by an independent agency, financial modelling of the impact on budgets and the outcome of a consultation exercise undertaken with service providers on the proposals. Options considered in relation to this proposal include: doing nothing and leaving fees at 2013/2014 levels or implementing the indicative minimum 'core' price proposed for 2017/18 or all services with immediate effect.

Information used to analyse the effects on equality

Findings of a 'Fair Price for Care' Review undertaken by an independent specialist agency to identify a reasonable minimum 'core' price for care in residential and nursing care services in the City, based on information on the actual costs of local services and national benchmarking data.

Outcome of a consultation process with providers on proposals for fees, including specific questions about the potential impact of the proposed fees and mitigating actions that could be taken.

	Could particularly benefit (X)	May adversely impact (X)	How different groups could be affected: Summary of impacts	Details of actions to reduce negative or increase positive impact (or why action not possible)
People from different ethnic groups	<input type="checkbox"/>	<input type="checkbox"/>	<p>The consultation with service providers on proposals for fees for a 'core' package of care from 2014/15 highlighted some potential areas of risk. A concern generally raised was that the fees proposed may not sufficiently cover the actual cost of providing care which is impacted by a number of inflationary factors, in particular on salaries. Additionally it was noted that the proposed four year transition to the new rates was too long. It was commented that the provision for voids in the review is not sufficient to cover the level of vacancies in homes. Specifically the following potential impacts were raised:</p> <ul style="list-style-type: none"> • Service Quality: Insufficient funding to cover the actual cost of care at the required level to meet needs may impact on the quality of care. Service quality may be impacted by issues with the recruitment and retention of staff due to low 	<p>Providers were invited to suggest actions that could be taken by providers or the Council to mitigate the impact of any risks. Actions suggested included:</p> <ul style="list-style-type: none"> • Providers seeking to attract more self funding residents • Continued engagement between the Council and providers, including a joint working party to consider definition of core service elements and the cost to providers of meeting additional needs in higher/ complex needs packages
Men, women (including maternity/pregnancy impact), transgender people	<input type="checkbox"/>	<input type="checkbox"/>		
Disabled people or carers	X	X		
People from different faith groups	<input type="checkbox"/>	<input type="checkbox"/>		
Lesbian, gay or bisexual people	<input type="checkbox"/>	<input type="checkbox"/>		
Older or younger people	X	X		
Other (e.g. marriage/civil partnership, looked after children, cohesion/good relations, vulnerable children/adults)	<input type="checkbox"/>	<input type="checkbox"/>		

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			<p>salaries and lack of funding for staff training. The proposal to remove the variation between fees based on quality banding of older people's services from 2014/15 may discourage homes from striving to achieve the highest band and impact on quality. Innovation may be stifled.</p> <ul style="list-style-type: none"> • Risk to higher cost/specialist services: The proposal to increase fees for lower cost services at a higher rate and to move towards and standard rate for a 'core' package may present risks to the delivery of specialist services and those for citizens with higher/complex needs (eg learning disabilities, physical disabilities, dementia and nursing care). Therefore citizens with high/complex needs may be disadvantaged and providers may reduce provision for citizens with higher needs. • Service viability: There may be a risk to the viability of some services – in particular high cost and nursing care. Services may need to be changed to make them viable. Some providers may be reluctant to accept Nottingham City Council funded residents or consider withdrawing from the City if the fees do not cover the cost of care. This may particularly affect specialist services eg nursing homes and dementia provision. • Self funders and 3rd party top ups: There may be an increasing variance between fees for self funders and NCC funded residents if providers charge higher rates to self funders in order to cross subsidise. Potential financial impact on families of residents if they are charged top ups to the Council funded fees. 	<ul style="list-style-type: none"> • Take 2 years to implement the minimum core price – not possible due to budget constraints. • Maintain quality bandings <p>Service Quality: It is intended that paying a minimum price across all services will enable all providers to deliver a quality service on a sustainable basis. Performance will be managed robustly and information on quality ratings will be available to citizens to support their choice of home.</p> <p>Risk to higher cost/specialist services: There is not expected to be a significant risk to services for citizens with higher and complex needs as it is proposed to pay for additional support/staffing/ hours required above the core price. The minimum rates proposed are based on the 'value for money' rate for residential care for older people with dementia cited in the independent review. A working group including service providers will take forward work to develop a pricing mechanism for higher needs packages (April – Sept 2014)</p>
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			<p>The risks identified are counter balanced to an extent by consultation responses in support of the proposals. There was some support for the proposal to increase fees for lower cost services at a higher rate than those currently paid at a higher level. The proposals aim to mitigate the risks to services currently receiving the lowest fees.</p> <p>Consultation on the proposal to award a 1% inflationary increase in 2014/15 raised similar issues as those identified in relation to the proposals for the levels of base fees. Specific potential risks included: impact on quality of care; reduced staffing levels; reduced investment in staffing including salaries, cost of living increases and training; impact on living environment, maintenance and facilities in homes.</p> <p>If the level of fees does not sufficiently cover the actual cost of delivering care, this would be more likely to affect disabled people and older people based on the general profile of citizens accessing services. Overall providers did not identify major concerns in relation to impact on individual users based on disability or other characteristics.</p>	<p>Service viability: Responses have been shared with the Market Development Team to consider any support needs of providers in relation to financial viability and sustainability</p> <p>Self funders/3rd party top ups: In relation to the risk of providers being reluctant to accept NCC funded residents (particularly higher needs packages), each case will be considered on an individual basis to minimise any negative impact on citizens.</p> <p>In relation to inflationary pressures, it is proposed to review inflation annually to take account of specific factors and pressures impacting on the actual costs of care which may vary over time. The annual review of inflation will include consultation with providers.</p>
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Outcome(s) of equality impact assessment:

No major change needed * Adjust the policy/proposal Adverse impact but continue Stop and remove the policy/proposal

* The proposals for pricing have been subject to a robust consultation process and analysis of the consultation outcome and impact assessment do not support changes to the original proposals

Arrangements for future monitoring of equality impact of this proposal / policy / service:

The performance of all services, including quality and impact on citizens is monitored on an ongoing basis. The impact of the fees paid for residential and nursing care services will be monitored on an ongoing basis, particularly in relation to quality and sustainability of services, viability of services operating in the City and the availability of services for placements by the Council. Further work will be undertaken to develop a fair and sustainable funding mechanism for placements of citizens with higher /complex needs over and above those included within a core service

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package. This work will involve service providers to assist the Council to understand the delivery of higher cost and specialist services. Inflationary increases will be reviewed annually in consultation with providers to consider the impact of inflationary pressures on the delivery of services.

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