

Equality Impact Assessment (EIA) Tool

Please ensure you have read the [guidance pages](#) prior to completing this tool

Document Control

Control Details:	
Title of EIA/ Decision (DDM):	Introduction of a new charge for citizens who will receive a money management service from the Deputyship Service under the authority of a DWP Appointeeship
Budget booklet code (if applicable):	R2
If this is a budget EIA, please ensure the title and budget booklet code is the same as the title used within the budget booklet	
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Contributors/Reviewers (Anyone who has contributed to this document to be named)

Name	Title role	Date
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Glossary of Terms

Term	Description
DWP	Department for Works and Pensions
COP	Court of Protection
NCC	Nottingham City Council
PW	Per week

Section 1 – Equality Impact (NCC staff/ Service users/ Citizen/ Community impact)

1. a. Brief description of proposal/ policy/ service to be assessed

The Deputyship Service manages the Property and Financial Affairs of vulnerable adults under an order from the Court of Protection, where they are assessed to lack mental capacity. NCC step in as a last resort where there are no family who are willing, able, or suitable to undertake the role. The amounts that Public Authority Deputies are permitted to charge are specified in the Court of Protection Rules and are contained within a current charging policy.

Nottingham City Council are now proposing to introduce new charges for money management that is provided through DWP Appointeeship for cases where Deputyship is not necessary. Deputyship is the most appropriate option for citizens who have savings, own assets such as property, have income other than state benefits (for example private or occupational pensions) or some other complexity requiring the authority of a Deputy. Appointeeship is more appropriate for citizens who have little or no savings and whose only source of income is state benefits: Appointeeship provides limited authority to receive benefits and use them to pay liabilities and provide for day-to-day needs. Appointeeship does not provide authority to manage tenancies, access bank accounts, manage assets or receive private pensions.

During 2024 citizens financial affairs that are currently managed by the Adult Residential Services Charging for Care Team under a DWP Appointeeship will transfer to the Deputyship Service. This will provide better assurance and a more client centred service.

It is proposed to introduce new fees for the Appointeeship Service. This will ensure full cost recovery for Appointeeship Officer posts that are needed manage cases.

The new Appointeeship charge is proposed at two rates: £10 a week for citizens living in residential care settings and £15 a week for citizens living in the community. The average charge for clients managed under a COP Deputyship Order is £20 per week.

This stepped charge reflects the level of complexity and work required for the three different case types and has been benchmarked against other Local Authority Deputyship and Appointeeship Services. Previously appointeeship cases had been referred to an external money management company who charge citizens £10.38 pw in residential settings and £17.31 pw in the community, plus a £150 set up fee.

This is the proposed charging policy which is subject to approval.

<M:\Deputyship Team\PROCEDURES & POLICIES\FINANCIAL Procedures\Deputyship and Appointeeship Charging Policy April 2024.docx>

The cost of each Grade E Appointeeship Officer role at Grade E at the top spinal point (E4) is £35,478 per year (including employee on-costs). An Appointeeship Officer is expected to manage up to 75 cases where a citizen lives in a residential care setting. This would equate to maximum income of £39,000 per year if all cases are chargeable. This charge will enable full cost recovery to be achieved to enable the establishment of the roles necessary to manage the case work.

1. b. Information used to analyse the equalities implications

The Deputyship Service currently manages the financial affairs of 220 citizens who lack mental capacity, under the authority of a COP Deputyship Order.

The Adult Residential Services Charging for Care Team manage the financial affairs of 250 citizens who lack mental capacity or have a severe disability, under the authority of a simple DWP appointeeship. During 2024 all 250 cases will transfer to the Deputyship Service to be managed. The cases will be transferred in stages during 2024: citizens will be prioritised for transfer based on level of assets that require managing/safeguarding, whether access to capital is required to meet citizens needs and wants, or due to other complexities. These cases will be managed in line with the Deputyship Services current good practice policies and procedures. The Service is governed by standards set by the Office of the Public Guardian, and compliance is monitored through case reviews and audits.

The new Appointeeship charge will be applied to the case that will be managed under Appointeeship. All these citizens have been placed by NCC Adult Social Care in residential or nursing care homes due to their health and social care needs, including significant Learning Disability or mental illness, dementia, or other disabling conditions. They will all have been assessed to lack mental capacity to manage their own financial affairs.

The new appointeeship charge will also affect any citizens newly referred into the Deputyship and Appointeeship Service who need their finances managed, both those living in residential care settings and those living in the community.

In order to ensure that citizens are able to afford the new charge, it is proposed that no charge is applied where a citizen has less than £2,000 in savings or is unable to afford it from their weekly 'disposable' income. The Deputyship Service already has a regime for assessing when a Deputyship Fee charge should be waived. The Service will be in control of the citizens capital so will be able to assess if they hold £2,000: to ensure emergency funds are available should there be an interruption in income. There will be a financial statement for each citizen detailing all income and expenditure which will demonstrate is there is disposable income to meet the charge.

A Consultation exercise was completed in conjunction with colleagues from the engagement and consultation team, which consisted of a mailshot to the residential homes where all of the 250 citizens reside and to Nottingham's Disability and Carers groups. 1 response was received from Brainkind. This queried how citizens would be able to afford the charge and what the income would be spent on. These questions have been answered in this document.

This EIA will be updated should any changes occur going forward.

1. c. Who will be affected and how?

Impact type (NCC staff/ Service users/ Citizens/ Community)	Equality group/ individual	Positive X	Negative X	None X	Reasons for your assessment (Including evidence)	Details of mitigation/ actions taken to advance equality	Details of any arrangements for future monitoring of equality impact (Including any action plans)
Service users	People from different ethnic groups	X	X		<p>Positive Impact - This is an essential service to vulnerable adults who lack capacity. The Service is client focused with officers managing 50 - 70 citizens affairs. They will involve the client and their circle of care (family, care providers) in decisions relating to their finances and ensure their best interests are met and health and wellbeing maximised.</p> <p>Negative impact – could be that the charge will be paid from the citizens income and/or capital and so may reduce funds available.</p>	<p>The charge is reviewed on a case by case basis. Where citizens are not able to afford to pay the fee will be waived.</p> <p>Liaison around decisions will be with residential care providers and/or family to ensure individuals needs are considered and met</p>	<p>Quality assurance measures are in place to ensure citizens are treated fairly and that decisions are based on their individual best interests.</p> <p>Measures include in-depth file reviews and feedback by managers, random Court Visitor reviews on a selection of cases through the year, and 3-yearly assurance visits (Audits) by the Public</p>

							Guardian, and 3-yearly Internal Audit reviews. This EIA will be updated should any changes occur
Service users	Men	X	X		<p>Positive Impact - This is an essential service to vulnerable adults who lack capacity. The Service is client focused with colleagues case managing 50 - 70 citizens affairs. They will involve the client and their circle of care (family, care providers) in decisions relating to their finances and ensure their best interests are met and health and wellbeing maximised.</p> <p>Negative impact – could be that the charge will be paid from the citizens income and/or capital and so may reduce funds available.</p>	<p>The charge is reviewed on a case by case basis. Where citizens are not able to afford to pay the fee will be waived.</p> <p>Liaison around decisions will be with residential care providers and/or family to ensure individuals needs are considered and met</p>	<p>Quality assurance measures are in place to ensure citizens are treated fairly and that decisions are based on their individual best interests.</p> <p>Measures include in-depth file reviews and feedback by managers, random Court Visitor reviews on a selection of cases through the year, and 3-yearly assurance visits (Audits) by the Public Guardian, and 3-yearly Internal Audit reviews.</p>

							This EIA will be updated should any changes occur
Service users	Women	X	X		<p>Positive Impact - This is an essential service to vulnerable adults who lack capacity. The Service is client focused with colleagues case managing 50 - 70 citizens affairs. They will involve the client and their circle of care (family, care providers) in decisions relating to their finances and ensure their best interests are met and health and wellbeing maximised.</p> <p>Negative impact – could be that the charge will be paid from the citizens income and/or capital and so may reduce funds available.</p>	<p>The charge is reviewed on a case by case basis. Where citizens are not able to afford to pay the fee will be waived.</p> <p>Liaison around decisions will be with residential care providers and/or family to ensure individuals needs are considered and met</p>	<p>Quality assurance measures are in place to ensure citizens are treated fairly and that decisions are based on their individual best interests.</p> <p>Measures include in-depth file reviews and feedback by managers, random Court Visitor reviews on a selection of cases through the year, and 3-yearly assurance visits (Audits) by the Public Guardian, and 3-yearly Internal Audit reviews.</p> <p>This EIA will be updated should any changes occur</p>

<p>Service users</p>	<p>Trans</p>	<p>X</p>	<p>X</p>	<p>Positive Impact - This is an essential service to vulnerable adults who lack capacity. The Service is client focused with colleagues case managing 50 - 70 citizens affairs. They will involve the client and their circle of care (family, care providers) in decisions relating to their finances and ensure their best interests are met and health and wellbeing maximised.</p> <p>Negative impact – could be that the charge will be paid from the citizens income and/or capital and so may reduce funds available.</p>	<p>The charge is reviewed on a case by case basis. Where citizens are not able to afford to pay the fee will be waived.</p> <p>Liaison around decisions will be with residential care providers and/or family to ensure individuals needs are considered and met</p>	<p>Quality assurance measures are in place to ensure citizens are treated fairly and that decisions are based on their individual best interests.</p> <p>Measures include in-depth file reviews and feedback by managers, random Court Visitor reviews on a selection of cases through the year, and 3-yearly assurance visits (Audits) by the Public Guardian, and 3-yearly Internal Audit reviews.</p> <p>This EIA will be updated should any changes occur</p>
<p>Service users</p>	<p>Disabled people/ carers</p>	<p>X</p>	<p>X</p>	<p>Positive Impact - This is an essential service to vulnerable adults who lack capacity.</p> <p>All of the Services client therefore have a long-term</p>	<p>The charge is reviewed on a case by case basis. Where citizens are not</p>	<p>Quality assurance measures are in place to ensure citizens are treated fairly and that decisions are based</p>

					<p>disabling condition causing them to lack mental capacity. Many have additional physical disabilities.</p> <p>The Service is client focused, acting as 'advocate, and is able to ensure the best interests of these citizens are served. Acting in a citizens best interests is a specified requirement of a Deputy or DWP Appointee. This is achieved through consultation with the client wherever possible and/or involving the citizens circle of care (family / care and support provider) in decisions relating to their finances and ensure their best interests are met and health and wellbeing maximised.</p> <p>Negative impact – could be that the charge will be paid from the citizens income and/or capital and so may reduce funds available.</p>	<p>able to afford to pay the fee will be waived.</p> <p>Liaison around decisions will be with residential care providers and/or family to ensure individuals needs are considered and met</p>	<p>on their individual best interests.</p> <p>Measures include in-depth file reviews and feedback by managers, random Court Visitor reviews on a selection of cases through the year, and 3-yearly assurance visits (Audits) by the Public Guardian, and 3-yearly Internal Audit reviews.</p> <p>This EIA will be updated should any changes occur</p>
Service users	Pregnancy and maternity			X	Citizens of this service do not have children.		

Service users	Marriage/Civil Partnership			X	Citizens of this service rarely marry / enter civil partnerships.		
Service users	People of different faiths/ beliefs and those with none	X	X		<p>Positive Impact - This is an essential service to vulnerable adults who lack capacity. The Service is client focused with colleagues case managing 50 - 70 citizens affairs. They will involve the client and their circle of care (family, care providers) in decisions relating to their finances and ensure their best interests are met and health and wellbeing maximised.</p> <p>Negative impact – could be that the charge will be paid from the citizens income and/or capital and so may reduce funds available.</p>	<p>The charge is reviewed on a case by case basis. Where citizens are not able to afford to pay the fee will be waived.</p> <p>Liaison around decisions will be with residential care providers and/or family to ensure individuals needs are considered and met</p>	<p>Quality assurance measures are in place to ensure citizens are treated fairly and that decisions are based on their individual best interests.</p> <p>Measures include in-depth file reviews and feedback by managers, random Court Visitor reviews on a selection of cases through the year, and 3-yearly assurance visits (Audits) by the Public Guardian, and 3-yearly Internal Audit reviews.</p> <p>This EIA will be updated should any changes occur</p>
Service users	Lesbian/ Gay/ Bisexual people	X	X		Positive Impact - This is an essential service to vulnerable adults who lack capacity. The	The charge is reviewed on a	Quality assurance measures are in place

				<p>Service is client focused with colleagues case managing 50 - 70 citizens affairs. They will involve the client and their circle of care (family, care providers) in decisions relating to their finances and ensure their best interests are met and health and wellbeing maximised.</p> <p>Negative impact – could be that the charge will be paid from the citizens income and/or capital and so may reduce funds available.</p>	<p>case by case basis. Where citizens are not able to afford to pay the fee will be waived.</p> <p>Liaison around decisions will be with residential care providers and/or family to ensure individuals needs are considered and met</p>	<p>to ensure citizens are treated fairly and that decisions are based on their individual best interests.</p> <p>Measures include in-depth file reviews and feedback by managers, random Court Visitor reviews on a selection of cases through the year, and 3-yearly assurance visits (Audits) by the Public Guardian, and 3-yearly Internal Audit reviews.</p> <p>This EIA will be updated should any changes occur</p>
Service users	Older	X	X	<p>Positive Impact - This is an essential service to vulnerable adults who lack capacity.</p> <p>48% of the Services clients are over 60 years of age, with a long-term disabling condition.</p>	<p>The charge is reviewed on a case by case basis. Where citizens are not able to afford to</p>	<p>Quality assurance measures are in place to ensure citizens are treated fairly and that decisions are based</p>

					<p>The Service is client focused, acting as ‘advocate, and is able to ensure the best interests of these citizens are served. Acting in a citizens best interests is a specified requirement of a Deputy or DWP Appointee. This is achieved through consultation with the client wherever possible and/or involving the citizens circle of care (family / care and support provider) in decisions relating to their finances and ensure their best interests are met and health and wellbeing maximised.</p> <p>Negative impact – could be that the charge will be paid from the citizens income and/or capital and so may reduce funds available.</p>	<p>pay the fee will be waived.</p> <p>Liaison around decisions will be with residential care providers and/or family to ensure individuals needs are considered and met</p>	<p>on their individual best interests.</p> <p>Measures include in-depth file reviews and feedback by managers, random Court Visitor reviews on a selection of cases through the year, and 3-yearly assurance visits (Audits) by the Public Guardian, and 3-yearly Internal Audit reviews.</p> <p>This EIA will be updated should any changes occur</p>
Service users	Younger			X	<p>Only 2% of the Services Clients are under 30 so this group are not significantly affected by this decision.</p>		
Service users	Care Experience (Please refer to the			X	<p>The Service works in partnership with Leaving Care teams where care for young people are transitioning from</p>		

	guidance notes for further information)				children to adults services, and they require their finances managed.		
	Other (e.g., cohesion/ good relations, vulnerable children/ adults), socio-economic background.			X	Not applicable		

1. d. Summary of any other potential impact (including cumulative impact/ human rights implications):

Service Delivery:
 The Deputyship Service will increase in full time equivalent posts in order to take on more cases. There is a current waiting list of approximately 250 cases that currently sit within the Adult Residential Care Charging for Care Team that will be transferred to become managed by the Deputyship Service. A capital-based charge is currently levied to citizens where a Court of protection Deputyship Order is in place. It is proposed that a charge is introduced for the provision of money management by way of DWP appointeeship delivered by the Deputyship Service. This charge will enable cost recovery for Appointeeship Officer roles that will be created to manage this work.

Impact on Residents
 Citizens will benefit from a specialist money management service to manage all of their property and financial affairs. A Deputy or Appointee is required to act in a citizens best interests to ensure that their health and wellbeing are maximised and also to ensure their income is maximised, liabilities paid and debts managed or avoided. The charging policy will ensure that citizens whose capital is low are only charged what they can afford and are supported to maintain a minimum amount of capital to meet their needs.

Section 2 – Equality outcome


Please include summary of the actions identified to reduce disproportionate negative impact, advance equality of opportunity and foster good relations. Please pull out all of the mitigations you have identified and summarise them in this action plan

Equality Outcome	Adjustments to proposal and/or mitigating SMART actions	Lead Officer	Date for Review/ Completion	Update/ complete
Eliminate unlawful discrimination, harassment, victimisation and any other conduct prohibited by the Equality Act 2010.	The service will be delivered in a client focused way. Each citizen will have a named 'case manager'. They will get to know the clients and their circumstances to enable them to manage their financial affairs and act in their best interests. Quality Assurance and compliance with the Equality Act is monitored through supervision and file audits.	Kate Dixon	31/3/25	
Advance equality of opportunity between those who share a protected characteristic and those who don't	The service does not manage the financial affairs of citizens who have mental capacity. Those citizen are able to manage their own financial affairs. A Deputy or Appointee ensures that a citizen is able to meet their financial commitments and receive a personal spending allowance for their day to day needs i.e., food and travel, so they are not disadvantaged in comparison to citizens who do not require the service.	Kate Dixon	31/3/25	
Foster good relations between those who share a protected characteristic and those who don't	The Service is in place to ensure that citizens who lack mental capacity, where there are no family or friends able to support them, have their money managed. This will include ensuring that they have a personal spending	Kate Dixon	31/3/25	

	allowance to participate in public life and can access and utilise any savings to further their health and wellbeing.			
(Please add other equality outcomes as required – e.g. mitigate adverse impact identified for people with a disability)	NA			

Please note: All actions will need to be uploaded onto Pentana

Section 3 – Approval and publishing

<p>The assessment must be approved by the manager responsible for the service /proposal. Approving Manager details (name, role, contact details):</p> <p>Kate Dixon, Deputyship Programme and Change Lead</p>	<p>Date sent for advice:</p> <p>09/05/2024</p>
<p>Approving Manager Signature:</p> 	<p>Date of final approval:</p> <p>23/05/2024</p>

For further information and guidance, please visit the [Equality Impact Assessment Intranet Pages](#)
 Alternatively, you can contact the Equality and Employability Team by telephone on 0115 876 2747

Send document or link for advice and/ or publishing to: edi@nottinghamcity.gov.uk

PLEASE NOTE: FINAL VERSION MUST BE SENT TO EQUALITIES OTHERWISE RECORDS WILL REMAIN INCOMPLETE.