

Equalities Impact Assessment

Directorate: Adult Culture and Community Services
Date: 26 September 2008
Business Unit: Commissioning and Strategy
Title: **Eligibility Criteria Policy for Adult Services**

Introduction

The **Eligibility Criteria Policy (ECP)** updates and replaces the ECP of January 2002. It sets out the approach taken within Adult Services¹ to determine whether an individual is eligible for community care services by establishing the circumstances which make individuals eligible for help. The ECP is a revision of the previous policy and contains no new policy initiatives.

1. The aims of the policy/procedure/practice/strategy (PPPS).

Purpose of the policy

The primary aims of the eligibility criteria policy from an equalities perspective are to ensure that:

- The assessment will focus on the factors which will help maintain an individual's independence over time and consider associated risks.
- Criteria meet equalities principles and are written in a non-discriminatory way.
- Immediate needs and possible future needs to be taken into account.

The ECP sets out the guidance of how to achieve fair access to care services through reviewing and revising eligibility criteria for adult social care.

CSCI's third annual State of Social Care report, published in January 2008, found that there is a sharp divide between people who do and do not qualify for social care. Local councils are increasingly only helping people with 'substantial' or 'critical' needs. All councils were asked to prioritise the needs that have immediate and longer-term critical consequences for independence ahead of needs with substantial or less serious consequences. Haringey has also taken in account resources, local expectations and local costs.

Through implementing the updated ECP, an improvement in the quality of providing and commissioning of services should be achieved.

Equalities monitoring is a key part of the implementation of the Council's Equal Opportunities Policy.

¹ Adult Services provides services which promote independence and well-being for vulnerable adults who meet Haringey's eligibility criteria for social care. Its services are provided for people with: addiction to drugs or other chemical substances, including alcohol; learning disabilities; life-limiting illnesses or HIV positive (or both); mental health problems; physical disabilities or a sensory impairment; physical or mental frailty

The existing Essential Criteria policy dates from 2002 and so pre-dates relevant equalities legislation such as:

- *Disability Discrimination Act 2005*
- *Equality Act 2006*

It also pre-dates the Council's Equalities Public Duties Scheme (2007-2010) and the Council's revised Equal Opportunities Policy of July 2007.

Who will benefit and how?

- All staff who have the responsibility for implementing eligibility criteria in service. Staff should be clearer about their roles and responsibilities and the expectations of them in relation to assessing an individual's need.
- Service users and carers should benefit from the policy through an assessment focusing on the factors which will help maintain an individual's independence over time and will consider associated risks.

List any other PPPS that are likely to have an impact or are relevant to this impact assessment.

- *The Framework-i User Manual v2.0* Haringey Council, Adult, Culture and Community Services, e-care June 2005
- *Framework-i 2.8.7 Guide* Haringey Council, Adult, Culture and Community Services, e-care June 2007
- *Putting People First*, launched by Government on 10 December 2007.

2. Consider relevant information and evidence

Equalities Monitoring Data

The Commission for Social Care Inspection (CSCI) requires and monitors data from Adult Services on age, ethnicity and gender. This data contributes to the performance indicators (PIs) for adult social care services. The nature of the service provided is support to people who are vulnerable or have a disability or a long term condition.

Equalities information for Quarter 1 of 08/09

There were 624 clients that were assessed and 506 were offered a service in Quarter 1 of 2008/09. The following tables reflect data available to ACCS and corporately.

| AGE | No. assessed | | No. offered service | | No. in Haringey |
|-------|---------------------|--------|---------------------|--------|-----------------------|
| 18-64 | 227 | 36.38% | 165 | 32.60% | 90.7 % |
| 65+ | 397 | 63.62% | 339 | 67% | 9.4 % |
| 80+ | 173 | 27.72% | 147 | 29.05% | 2.2 % |
| | Source: Framework-i | | Source: Framework-i | | Source: MYE, 2006 ONS |

| GENDER | No. assessed | | No. offered service | | No. in Haringey |
|--------|---------------------|-------|---------------------|--------|-----------------------|
| Male | 228 | 36.5% | 179 | 35.38% | 50.09% |
| Female | 396 | 63.5% | 327 | 64.62% | 49.91% |
| | Source: Framework-i | | Source: Framework-i | | Source: MYE, 2006 ONS |

| DISABILITY 18-64 | No. assessed | | No. offered service | | No. in Haringey |
|-------------------------|---------------------|--------|---------------------|--------|------------------------|
| Learning Disability | 12 | 1.92% | 10 | 1.98% | Not established |
| Mental Health | 57 | 9.13% | 22 | 4.35% | |
| Other Vulnerable People | 5 | 0.80 % | 3 | 0.59% | |
| Physical Disability | 145 | 23.23% | 123 | 24.31% | |
| Substance Misuse | 8 | 1.28% | 8 | 1.58% | |
| | Source: Framework-i | | Source: Framework-i | | |

| DISABILITY 65+ | No. assessed | | No. offered service | | No. in Haringey |
|---------------------|---------------------|--------|---------------------|--------|------------------------|
| Mental Health | 8 | 1.28% | 5 | 0.99% | Not established |
| Physical Disability | 389 | 62.34% | 335 | 66.21% | |
| | Source: Framework-i | | Source: Framework-i | | |

| ETHNICITY | No. assessed | | No. offered service | | No. in Haringey |
|------------------------|---------------------|--------|---------------------|--------|------------------------|
| Asian or Asian British | 39 | 6.25% | 34 | 6.72% | 7.6% |
| Black or Black British | 140 | 22.4% | 112 | 22.13% | 18.7% |
| Mixed | 12 | 1.92% | 10 | 1.98% | 3.4% |
| Not Stated | 3 | 0.48% | 2 | 0.40% | Not established |
| Other Ethnic Group | 23 | 3.69% | 17 | 3.36% | |
| Unknown | 2 | 0.32% | 0 | 0.00% | |
| White | 405 | 64.90% | 331 | 65.41% | 69.2% |
| | Source: Framework-i | | Source: Framework-i | | Source: MYE, 2005 ONS |

| RELIGION/BELIEF | No. assessed | | No. offered service | | No. in Haringey |
|-----------------|---------------------|--------|---------------------|--------|-------------------------------------|
| Buddhist | 2 | 0.32% | 2 | 0.39% | 1.1% |
| Catholic | 28 | 4.49% | 26 | 5.14% | Data included with Christian |
| Christian | 193 | 30.93% | 162 | 32.02% | 50.1% |
| Greek Orthodox | 22 | 3.53% | 17 | 3.35% | Data included with Christian |
| Hindu | 9 | 1.44% | 8 | 1.58% | 2.1% |
| Jewish | 12 | 1.92% | 12 | 2.37% | 2.6% |
| Muslim | 40 | 6.41% | 31 | 6.13% | 11.3% |
| No Religion | 20 | 3.21% | 15 | 2.96% | 20.0% |
| Not Stated | 176 | 28.21% | 148 | 29.25% | 12.1% |
| Other Religion | 14 | 2.24% | 11 | 2.17% | 0.5% |
| Sikh | 3 | 0.48% | 3 | 0.59% | 0.3% |
| Unknown | 105 | 16.83% | 71 | 14.03% | Not established |
| | Source: Framework-i | | Source: Framework-i | | Source: Census 2001 |

There are no obvious discrepancies in the data between individuals who were assessed for a service and those who were offered a service. Data entered in the above tables for the number of people in Haringey is the latest available and can only provide an indication for the percentage of population for each category. All these figures need to be viewed with some caution as some are historical cases which need to be closed. They will be subject to data cleansing and may not give a complete and accurate picture. However, they do tend to indicate that the recording of equalities data could be improved.

Sexuality is not yet recorded on Framework-i. Haringey Council decided in July 2007, when the revised Equal Opportunities Policy was adopted, to introduce and roll out monitoring of sexuality in service provision. We are now in the process of incorporating this as a field in Fwi, but at present we do not record this information. Guidance will be given when Framework-i has been updated to record this information in Adult Services.

In terms of the other equalities strands which form part of the Council's Equal Opportunities Policy, religion is recorded on Framework-i but it does not form part of the performance indicators which are reported to CSCI.

CSCI annual report ²

Freedom from discrimination or harassment.

The judgment was that outcomes in this area are good. The report states that:

recording of ethnicity at assessment and service provision improved but more work is required to capture this information at assessment

This is relevant to the implementation of the updated ECP.

Data from complaints³

Equalities data is collected to assess how Adult Social Care can better meet the needs of the community. However a number of people did not provide ethnic monitoring data as the table below shows. Complainants are being encouraged to provide this data.

| Record of ethnicity of complainants 2007-08 | |
|--|-----------------------|
| Ethnicity | No. of records |
| Black or Black British | 3 |
| Asian or Asian British | 0 |
| White British | 23 |
| White Other | 0 |
| Mixed | 0 |
| Other ethnic group | 1 |
| Not recorded | 84 |
| Total | 111 |

² Summary report of 2006-07 annual performance assessment of social care services for Adults Services for haringey (CSCI November 2007)

³ Adult Social Care Complaints Annual Report 2007-08

Evidence of consultation with staff, community groups or stakeholders

Since the updating of the Eligibility Criteria Policy does not involve any new policy initiatives a *widespread* consultation will not be undertaken. The following steps will be taken:

- A draft of the policy will be circulated for consultation and agreement to the Directorate Management Meetings of Commissioning and Strategy and Adult Services.

3. Assessment of likely positive or negative impact on:

a) The equality groups by age, disability, gender, race, religion or belief and sexuality.

Positive impact

There should be a positive benefit to all of the equalities groups from the implementation of the updated policy. The existing policy dates from 2002. This revised policy incorporates national, legal and good practice developments since 2002. It also takes account of the implementation of Framework-I, the Directorate's social care application.

All work with service users is now expected to be carried out with regard to the seven outcomes of the Government White Paper, *Our Health, Our Care, Our Say*⁴. Outcome 5 is *Freedom from discrimination or harassment*. Assessments should provide evidence of the outcomes, including Outcome 5 which is particularly relevant to equalities.

Putting People First, launched by Government on 10 December 2007, presents a system-wide transformation of adult social care and supports the Government's commitment to independent living for all adults. This will positively benefit the implementation of the revised policy through the creation of a high quality care system which is fair, accessible and responsive to the individual needs of those who use services and their carers.

Negative impact

Haringey will take into account resources, local expectations and local costs.

If a person is assessed as having moderate or low needs, they will not be provided with a service to support that need. The person may feel entitled to services.

- Haringey will provide advice and information on other possible sources of help and assist as much as time and resources will allow.

b) The PPS listed in number 1.

Negative impact:

None

4. Can the negative impact be justified, if yes please detail.

Not applicable

5. Consideration of alternative measures to reduce any adverse impact.

Not applicable

⁴ *Our Health, Our Care, Our Say* Department of Health 2006

6. Identify any further action that needs to be taken and ensure that the key elements are incorporated into your Business Plans.

The revised policy is being presented to the Directorate Management Team in Autumn 2008 for adoption.

7. Monitoring and reviewing arrangements.

The policy will be reviewed every year and an EIA will be part of that review.

8. Publishing the Impact assessment.

The review will be published on the council website.

This Equalities Impact Assessment was carried out by:

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