

BUDGET PROPOSAL EQUALITY ANALYSIS TEMPLATE

BUDGET PROPOSAL		Fairer Contributions Policy update			
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STRATEGIC DIRECTOR:		David Quirke-Thornton			
DEPARTMENT		Client Finance and Personal Budgets	DIVISION		Children and Adult Services
PERIOD ANALYSIS UNDERTAKEN		April 2019 to January 2020			
DATE OF REVIEW (IF APPLICABLE)					
SIGN-OFF		POSITION		DATE	

Guidance notes

Things to remember:

Under the Public Sector Equality Duty (PSED) within the Equality Act 2010, public authorities are required to have due regard to the aims of the general equality duty when making decisions, *including budget related decisions*.

We must have due regard to the need to:

- Eliminate unlawful discrimination, harassment and victimisation.
- Advance equality of opportunity between people who share a “protected characteristic” and those who do not.
- Foster good relations between people who share a protected characteristic and those who do not.

The “protected characteristics” under the Act are: Age, Sex, Disability, Race Religion/Belief, Sexual Orientation, Gender Reassignment, Pregnancy and Maternity Marriage and Civil Partnerships¹

The Council also has a specific duty to publish information showing how it has met its duties under the Act.

An equality analysis should be completed in respect of key budget proposals where it is identified via screening that there is a significant risk of the decision having an adverse impact on equality groups sharing a “protected characteristic”.

¹ Only the “eliminate unlawful discrimination” duty applies to marriage and civil partnerships

Understanding the effect of the council's decisions on people with different protected characteristics is an important part of complying with the general equality duty.

Under the PSED the council must ensure that:

- Decision-makers are aware of the general equality duty's requirements.
- The general equality duty is complied with before and at the time a proposal is under consideration and when a decision is taken.
- We consciously consider the need to do the things set out in the aims of the general equality duty as an integral part of the decision-making process.
- We have sufficient information to understand all the potential effects of the proposal.
- We consciously consider the need to do the things set out in the aims of the general equality duty not only when a proposal is developed and decided upon, but when the decision is being implemented.

When carrying out the analysis:

- Consider all the protected characteristics and all aims of the general equality duty (apart from in relation to marriage and civil partnership, where only the discrimination aim applies).
- Focus on understanding the effects of a proposal on equality and any actions needed as a result, not just the production of the document.
- Take a proportionate approach. In practice this means giving greater consideration to the Duty when a proposal has the potential to have a significant effect on discrimination or equality of opportunity, the public or employees, and less consideration when the effect on equality is slight.
- Use good evidence. Where it isn't available, take steps to gather it (where practical and proportionate).
- Using insights from engagement with employees, service users and others can help provide evidence for equality analysis.

The public will be able to view and scrutinise any equality analysis undertaken. Equality analysis should therefore be written in a clear and transparent way using plain English. Equality analysis may be published under the council's publishing of equality information.

Equality analysis should be reviewed after a sensible period of time to see if the effects that were expected have occurred. This does not mean repeating the equality analysis, but using the experience gained through implementation to check the findings and to make any necessary adjustments.

Engagement with the community is recommended as part of the development of an equality analysis.

Section 1: Description of budget proposal

Please provide full details of the budget proposal and the predicted saving

The following changes to our fairer contributions policy (FCP) are proposed –

- Simplify the FCP to make our approaches to residential and non-residential financial assessments clearer
- Increase the minimum contribution from £3 to £5
- Specify a charge of £200 for the council to arrange care for full cost clients assessed for non-residential care (excluding alarm only service users). The charge will apply to new service users and to all service users when there is a significant change to their care and support.
- Use light touch assessments for those receiving alarm services
- Promote deferred payment agreements and charges on property
- Introduce a review trigger for Disability Related Expenditure (DRE) claims over £20 per week from April 2021

Section 2: Overview of service users and key stakeholders consulted

Service users and stakeholders	
Key users of the department or service	<p>All adult service users who Adult Social Care (ASC) assesses as having eligible needs and whose needs we agree to meet through the provision of care and support.</p> <p>Carers are not charged for any services they receive and so are not directly affected by any proposed changes.</p> <p>The proposals will potentially impact on all ACS service users in receipt of a personal budget, in particular those:</p> <ul style="list-style-type: none"> • with sufficient weekly income to make a contribution following the financial assessment • Sufficient capital to make a contribution following financial assessment • Service users whose needs are being met outside of a care home
Key stakeholders who were/are involved in development of this budget proposal	<p>The proposals were promoted using a range of methods, including:</p> <ul style="list-style-type: none"> • An online consultation via the council's consultation hub • Invitations to 30 community organisations and advocacy groups to engage • Call to action via Communities Southwark and the Forum for Equalities and Human Rights • Paper questionnaires sent out to community organisations on request • An article in Southwark Life, posted to every household in the borough • An open invitation to engage in person or on the phone with any interested parties • A public meeting with the Southwark Pensioners Action Group • Letters to service users and financial representatives who would be most directly affected by the changes • Drop in sessions for service users and carers at local day centres

Section 3: Pre-implementation equality analysis

This section considers the potential impacts (positive and negative) on groups with 'protected characteristics', the equality information on which this analysis is based and any mitigating actions to be taken.

Age – Older people, young people etc

Potential impacts (positive and negative) of budget proposal

Increase the minimum contribution from £3 to £5

This change will take the following age groups out of charging.

Age Group	Number affected	Percentage of the total
18-64	13	33.3%
65-84	20	51.2%
85+	6	15.4%
Grand Total	39	

The total reduction in income will be c£7,800 per annum. Although there will be fewer adults charged for care resulting in lower income to the council, there will be a corresponding reduction of administrative tasks in means testing and managing debts.

Introducing an administrative charge of £200 for full cost non-residential care clients (excluding alarm only service users)

We are proposing introducing this administrative fee for the service users listed below:

- New service users responsible for the full cost of their care,
- Service users who stopped services in the past and then resume services, and who are responsible for the full cost of their care,
- Existing service users, who are responsible for the full cost of their care, but only when there is a significant change to their care and support (such as the set up of a new care package).

We are proposing to exempt the following service users from the administrative charge:

- Service users whose only service is the Telecare alarm service, and
- Service users where the change in care package results in a residential or nursing home placement.

Service users who are responsible for the full cost of their care and in receipt of the Telecare alarm service will be exempt from this charge only for as long as they are not in receipt of other social care services.

There are currently 242 service users (excluding alarm only service users) assessed as having to pay towards the full cost of their non-residential care, and they are broken down into the following age groups.

Age Group	Number affected	Percentage of the total
18-64	66	27.3%

65-84	94	38.8%
85+	82	33.9%
Grand Total	242	

There is no guarantee that all of the above service users will be affected by the introduction of this fee. Older adults will see the greatest impact, as 72.7% could potentially be affected, as compared with a total older adult base of 67.5%.

Use of light touch assessments

It is proposed to use light touch assessments for those with the Telecare alarm only services and for those who choose not engage with the financial assessment process. Based on current data, we estimate that there will be a reduction in the need for a full financial assessment in around 35% to 40% of cases.

Completing these light touch assessments will reduce the burden on service users of having to complete a full financial assessment.

The time that it takes to complete a light-touch financial assessment is roughly the same as it takes to complete a full financial assessment, so there will not be an efficiency saving for the Council. In terms of debts to the local authority, there is likely to be a small decrease in debt in cases where the council has managed to complete a light-touch financial assessment where otherwise a full charge assessment would apply.

The age breakdown of service users whose only service is the Telecare alarm is shown below.

Telecare only age breakdown	Number of service users	Percentage of the total
18-64	304	16.1%
65-84	978	51.8%
85+	606	32.1%
Grand Total	1,888	

The age breakdown of all service users (that have had a financial assessment) is shown below.

Age range	Percentage of client base
18-64	32.5%
65-84	39.9%
85+	27.6%
Grand Total	

The two tables above show that nearly 84% of Telecare only service users are older adults, compared with 67.5% for the whole of adult social care. This shows that older adults are more likely to benefit from this proposal than younger adults.

Promote deferred payment agreements and charges on property

According to NHS statistics, 98.9% of active Deferred Payment Agreements were for adults over 65, and 1.1% were for adults between 18 and 64 across England and Wales². Take up of Deferred Payment Agreements varies from council to council, with Southwark only having 2 deferred payments (both for service users over 65).

The aim of this proposal is to promote the use of deferred payment agreements as a mechanism for service users to pay towards residential care. It is expected that it will be older adults (those over 65) who would benefit the most from this proposal.

Introduce a review trigger for Disability Related Expenditure (DRE) claims over £20 per week

The table below shows the number of service users who currently have more than £20 DRE allowed in their financial assessment. Adults under 65 account for 34% of the total whereas older adults account for 66% of the total. This is roughly in proportion of the total adult social care service user base figures of 32.5% for younger adults and 67.5% for older adults.

Age band	Greater than £20	Percentage of total
18-64	66	34.0%
65-84	79	40.7%
85+	49	25.3%
Grand Total	194	

To lessen the impact, we are proposing to contact all affected service users in order to provide them with information about the changes in the policy and to provide us with evidence if required

In addition, we propose that this change is introduced in April 2021, which will provide service users with sufficient time to request higher allowances in their financial assessment.

Equality information on which above analysis is based

The Care Act 2014
The Equality Act 2010
Demographic analysis
NHS digital

Mitigating actions to be taken

- 1) Improvements in communications with service users, their representatives and the general public, particularly around the use of deferred payment agreements and financial assessment rules.
- 2) We will target those service users who are negatively affected by the proposals to lessen any impact they may have.
- 3) We will continue to apply the charging policy equally amongst all service users,

² Source: <https://digital.nhs.uk/data-and-information/publications/statistical/deferred-payment-agreements/2017-18>

irrespective of age.

Disability - A person has a disability if s/he has a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities.

Possible impacts (positive and negative) of budget proposal

Increase the minimum contribution from £3 to £5

This change will take service users from the following support groups out of charging.

Support group	Number affected
Learning Disability support : Learning disability support	3
Mental Health support : Mental Health support	2
Physical Support : Access and mobility only	7
Physical Support : Personal care and support	25
Sensory Support : Support for dual impairment	1
Social support : Support for social isolation/other	1
Grand Total	39

Over 64% of those affected require Personal Care and related support. There should not be any negative impact on any of the affected service users, as all of those affected will cease to be charged.

Depending on changes in individual circumstances, some of these service users may come back into charging in the future, particularly if they are just under the £5 charge limit.

Introducing an administrative charge of £200 for full cost non-residential care clients (excluding alarm only service users)

The introduction of the charge may affect some or all of the current service users responsible for the full cost of their care:

Support Group	Number / support group
Learning Disability support : Learning disability support	30
Mental Health support : Mental Health support	39
Physical Support : Access and mobility only	21
Physical Support : Personal care and support	133
Social support : Substance misuse support	1
Social support : Support for social isolation/other	5
Support with memory and cognition : Support with memory and cognition	13

The figures above is roughly in line with the core adult social care service base, but with fewer learning disabled service users and more mental health and personal care service users.

Support Group	Admin charge (below)	SALT	Difference
Learning Disability support : Learning disability support	12.4%	20.6%	-8.2%
Mental Health support : Mental Health support	16.1%	10.6%	5.5%
Physical Support : Access and mobility only	8.7%	10.0%	-1.3%
Physical Support : Personal care and support	55.0%	50.5%	4.4%
Sensory Support : Support for dual impairment	0.0%	0.1%	-0.1%
Sensory Support : Support for hearing impairment	0.0%	0.1%	-0.1%
Sensory Support : Support for visual impairment	0.0%	0.4%	-0.4%
Social support : Asylum seeker support	0.0%	0.0%	0.0%
Social support : Substance misuse support	0.4%	0.3%	0.1%
Social support : Support for social isolation/other	2.1%	1.9%	0.2%
Support with memory and cognition : Support with memory and cognition	5.4%	5.5%	-0.1%

Use of light touch assessments

The introduction of light touch financial assessments is expected to lessen the burden on service users to complete a full financial assessment, so this should be seen as having a positive impact on disabled service users.

There should not be any negative impact on disabled service users, apart from those service users who have memory and cognition needs or those with learning disabilities who have nobody to support them, as they might not know that they can request a full financial assessment.

Promote deferred payment agreements and charges on property

This proposal is not expected to have any negative impact on service users with a disability. The proposal to promote the scheme will have a positive impact on any service users who own property and who enter into residential or nursing accommodation, as it will increase the number of options available to them to settle care home charges.

Introduce a review trigger for Disability Related Expenditure (DRE) over £20 per week

This proposal is likely to have a negative impact on adults with disabilities, as generally, it is adults with the most need that have the most disability expenditure.

Equality information on which above analysis is based

The Care Act 2014
The Equality Act 2010
Demographic analysis

Mitigating actions to be taken

- 1) Service users who lack mental capacity to manage their affairs and do not have someone doing this on their behalf will be provided support or signposted to

organisations that are set up to help adults in these circumstances.

- 2) The council will work with those most negatively affected by the changes, particularly around the impact of the review trigger to DRE, in order to minimise any impact they may have.
- 3) Communication with service users and the general public will be improved.
- 4) Easy Read literature available to service users with a learning disability will be expanded further.

Gender reassignment - The process of transitioning from one gender to another.

Possible impacts (positive and negative) of budget proposal

These measures do not disproportionality effect those who have undergone gender reassignment.

The council will continue to promote independence, and help reduce inequality between those with protected characteristics and those without. We do not believe that these proposals give rise to discrimination, harassment, victimisation and/or fail to advance equality of opportunity between those who share a protected characteristic and those who do not.

Equality information on which above analysis is based.

The Care Act 2014
The Equality Act 2010

Mitigating actions to be taken

The council will continue to monitor the position and if any issues in respect of this protected characteristic are identified, action will be taken to ensure fairness and equality.

Marriage and civil partnership - (Only to be considered in respect to the need to eliminate discrimination).

Possible impacts (positive and negative) of budget proposal

These measures do not disproportionality effect those who are married or in a civil partnership.

The council will continue to promote independence, and help reduce inequality between those with protected characteristics and those without. We do not believe that these proposals give rise to discrimination, harassment, victimisation and/or fail to advance

<p>equality of opportunity between those who share a protected characteristic and those who do not.</p>
<p>Equality information on which above analysis is based.</p>
<p>The Care Act 2014 The Equality Act 2010</p>
<p>Mitigating actions to be taken</p>
<p>The council will continue to monitor the position and if any issues in respect of this protected characteristic are identified, action will be taken to ensure fairness and equality.</p>

<p>Pregnancy and maternity - Pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth, and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.</p>
<p>Possible impacts (positive and negative) of budget proposal</p>
<p>These measures do not disproportionality effect those who are pregnant or during maternity leave.</p> <p>The council will continue to promote independence, and help reduce inequality between those with protected characteristics and those without. We do not believe that these proposals give rise to discrimination, harassment, victimisation and/or fail to advance equality of opportunity between those who share a protected characteristic and those who do not.</p>
<p>Equality information on which above analysis is based.</p>
<p>The Care Act 2014 The Equality Act 2010</p>
<p>Mitigating actions to be taken</p>
<p>The council will continue to monitor the position and if any issues in respect of this protected characteristic are identified, action will be taken to ensure fairness and equality.</p>

Race - Refers to the protected characteristic of Race. It refers to a group of people defined by their race, colour, and nationality (including citizenship) ethnic or national origins.

Possible impacts (positive and negative) of budget proposal

Increase the minimum contribution from £3 to £5

This change will take service users from the following groups out of charging.

Ethnicity	Grand Total	Percentage of Total
Asian/Asian British	2	5.1%
White	20	51.3%
Black/Black British	14	35.9%
Other Ethnic Groups	2	5.1%
Not recorded	1	2.6%
Grand Total	39	

The table below represents all active service users, receiving long term care between September 2019 and December 2019³.

Ethnicity	Grand Total	Percentage of total
Asian/Asian British	164	4.7%
Black/Black British	1,268	36.0%
Mixed/Multiple ethnic groups	85	2.4%
White	1,842	52.3%
Other Ethnic Groups	124	3.5%
Not Stated	36	1.0%
Grand Total	3,519	

A comparison between the two groups shows that this proposal is broadly in line with the adult social care base, as the table below shows.

Ethnicity	£3 to £5	SALT	Difference
Asian/Asian British	5.1%	4.7%	0.5%
Black/Black British	35.9%	36.0%	-0.1%
Mixed/Multiple ethnic groups		2.4%	-2.4%
White	51.3%	52.3%	-1.1%
Other Ethnic Groups	5.1%	3.5%	1.6%
Not Stated	2.6%	1.0%	1.5%

Introducing an administrative charge of £200 for full cost non-residential care clients (excluding alarm only service users)

Ethnicity	Full cost service users	Percentage of Total
Asian/Asian British	7	2.9%

³ Source: SALT report, tables 3a and 3b in LTS001b

Black/Black British	58	24.0%
Mixed/Multiple ethnic groups	2	0.8%
White	164	67.8%
Other Ethnic Groups	7	2.9%
Not stated	4	1.7%
Grand Total	242	

The comparison between these figures and the core adult social care base is shown below. There are two groups of service users (Black/Black British and White) where the percentage of those affected by this proposal is different to a comparable percentage of the core social care base, this is largely a reflection of the ethnic make up of different age groups. i.e. our older population are more likely to be from a White background, and this is a larger proportion of ASC service users than the general population.

Ethnicity	Full cost service users	SALT	Difference
Asian/Asian British	2.9%	4.7%	-1.8%
Black/Black British	24.0%	36.0%	-12.1%
Mixed/Multiple ethnic groups	0.8%	2.4%	-1.6%
White	67.8%	52.3%	15.4%
Other Ethnic Groups	2.9%	3.5%	-0.6%
Not stated	1.7%	1.0%	0.6%

Use of light touch assessments

The use of light touch assessments is not expected to have any negative impact on any particular ethnic group. However, those service users whose first language is not English and who do not have a representative to help them may be impacted if they do not understand that a full financial assessment can be undertaken upon request.

Promote deferred payment agreements and charges on property

This proposal is not expected to have any negative impact on any service users. The proposal to promote the scheme will have a positive impact on any service users who own property and who enter into residential or nursing accommodation, as it will increase the number of options available to them to settle care home charges.

Place a review point of £20 per week on DRE (disability related expenditure) from April 2021

This proposal is not likely to have a major negative impact on adults based on race. The table below shows who may be affected.

Ethnicity	DRE of more than £20	Percentage of Total
Asian/Asian British	10	5.2%
Black/Black British	71	36.6%
Mixed/Multiple ethnic groups	4	2.1%
White	93	47.9%
Other Ethnic Groups	7	3.6%
Not Stated	9	4.6%
Grand Total	194	

The comparison between this group and the core adult social care base is shown below, this indicates that the impact will be broadly in line with our user profile.

Ethnicity	DRE of more than £20	SALT	Difference
Asian/Asian British	5.2%	4.7%	0.5%
Black/Black British	36.6%	36.0%	0.6%
Mixed/Multiple ethnic groups	2.1%	2.4%	-0.4%
White	47.9%	52.3%	-4.4%
Other Ethnic Groups	3.6%	3.5%	0.1%
Not Stated	4.6%	1.0%	3.6%

The proposal to review DRE exceeding £20 per week may affect some or all of these service users. This trigger point is not meant to represent an absolute maximum allowance for disability related expenditure, as every affected service user can still claim more than this amount. To lessen the impact, we are proposing to contact all affected service users in order to provide them with every opportunity to claim more than £20 in their assessment. In addition, we propose that this change is introduced in April 2021, which will provide service users with sufficient time to request higher allowances in their financial assessment.

Equality information on which above analysis is based

The Care Act 2014
The Equality Act 2010
Demographic analysis

Mitigating actions to be taken

- 1) The council will work with those most negatively affected by the changes, particularly around the impact of the review trigger for DRE claims over £20 per week, in order to minimise any impact they may have.
- 2) Communication with service users and the general public will be improved.
- 3) Easy Read literature available to service users with a learning disability will be expanded further.
- 4) We will expand the use of Translation and Interpreter services to assist those service users who need it.

Religion and belief - Religion has the meaning usually given to it but belief includes religious and philosophical beliefs including lack of belief (e.g. Atheism). Generally, a belief should affect your life choices or the way you live for it to be included in the definition.

Possible impacts (positive and negative) of budget proposal

These measures do not disproportionately affect those based on their religion and beliefs.

We did note the different approaches to borrowing and interest charges of some faiths, in relation to the proposed promotion of DPAs. However, these will not be compulsory, and therefore we did not consider there to be any negative impact and mitigation required.

The council will continue to promote independence, and help reduce inequality between those with protected characteristics and those without. We do not believe that these proposals give rise to discrimination, harassment, victimisation and/or fail to advance equality of opportunity between those who share a protected characteristic and those who do not.

Equality information on which above analysis is based.

The Care Act 2014
The Equality Act 2010

Mitigating actions to be taken

The council will continue to monitor the position and if any issues in respect of this protected characteristic are identified, action will be taken to ensure fairness and equality.

Sex - A man or a woman.

Possible impacts (positive and negative) of budget proposal

Increase the minimum contribution from £3 to £5

This change will take service users from the following groups out of charging.

Sex	Grand Total	Percentage of Total
Female	24	61.5%
Male	15	38.5%
Grand Total	39	

Comparing the percentages above with the total adult social care client base (below) shows that the figures are comparable.

Sex	£3 to £5	Client base	Difference
Female	61.5%	59.6%	2.0%
Male	38.5%	40.0%	-1.5%
Unknown	0.0%	0.4%	-0.4%

Introducing an administrative charge of £200 for full cost non-residential care clients (excluding alarm only service users)

Those service users who are responsible for the full cost of their care are broken down as follows.

Sex	Breakdown	Percentage of Total
Female	141	58.3%
Male	101	41.7%
Grand Total	242	

This is roughly representative of the adult social care client base, as shown below.

Sex	Full cost	SALT	Difference
Female	58.3%	59.6%	-1.3%
Male	41.7%	40.0%	1.7%
Unknown	0.0%	0.4%	-0.4%

Use of light touch assessments

The introduction of light touch financial assessments is expected to lessen the burden on service users to complete a full financial assessment, so this should be seen as having a positive impact on disabled service users.

There should not be any negative impact on service users based on their sex.

Promote deferred payment agreements and charges on property

This proposal is not expected to have any negative impact on service users, irrespective of their sex. The proposal to promote the scheme will have a positive impact on any service users who own property and who enter into residential or nursing accommodation, as it will increase the number of options available to them to settle care home charges.

Place a trigger review of allowances in excess £20 per week on DRE (disability related expenditure) from April 2021

This has the potential to affect the following service users based on their sex.

Sex	Greater than £20	Percentage of Total
Female	132	68.0%
Male	62	32.0%
Grand Total	194	

A comparison with the core adult social care base is shown below.

Sex	DRE	SALT	Difference
Female	68.0%	59.6%	8.4%
Male	32.0%	40.0%	-8.0%
Unknown	0.0%	0.4%	-0.4%

Proportionally, women could be affected by this proposal more than men. Further analysis will need to be undertaken to determine the reasons, so that the council can mitigate any risks to women as a result of this proposal.

Equality information on which above analysis is based

The Care Act 2014 The Equality Act 2010 Demographic analysis
Mitigating actions to be taken
<ol style="list-style-type: none"> 1) The council will work with those most negatively affected by the changes, particularly around the impact of the trigger review to DRE, in order to minimise any impact they may have. 2) Communication with service users and the general public will be improved. 3) Further analysis is required to determine the reason more women than men proportionally claim higher rates of DRE, in order to mitigate against any potential risk to women if the review trigger for DRE claims over £20 per week is introduced in April 2021.

Sexual orientation - Whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes
Possible impacts (positive and negative) of budget proposal
<p>These measures do not disproportionality effect those based on their sexual orientation.</p> <p>The council will continue to promote independence, and help reduce inequality between those with protected characteristics and those without. We do not believe that these proposals give rise to discrimination, harassment, victimisation and/or fail to advance equality of opportunity between those who share a protected characteristic and those who do not.</p>
Equality information on which above analysis is based.
The Care Act 2014 The Equality Act 2010
Mitigating actions to be taken
The council will continue to monitor the position and if any issues in respect of this protected characteristic are identified, action will be taken to ensure fairness and equality.

Section 5: Further actions

5. Further analysis and mitigating actions			
Based on the initial analysis above, please detail the key mitigating actions and desired outcomes, or the areas identified as requiring more data or detailed analysis.			
Number	Description of issue	Action and desired outcome	Timeframe
1	Communications	Communications with residents will be improved, with a particular focus on ensuring we use plain English. We will continue to ensure that other formats are available to adults, such as the use of easy read versions for adults with learning difficulties.	By April 2020 and then regularly reviewed.
2	Support provided to adults	Further support, guidance and signposting will be provided to adults who are likely to be affected the most by the proposals. Support may include ensuring the adult has an advocate working with them, ensuring the adult has someone with legal authority to manage their affairs, or simply signposting the adult to organisations that can help them.	By April 2020 for all proposals apart from the DRE review trigger. By April 2021 for those affected by the DRE review trigger.
3	Analysis	Further analysis of why some groups of service users may be affected more than others, particularly around a person's disability or gender, will be undertaken. This analysis will guide any further mitigation to put in place for those that may be the most affected by any of the proposals.	By April 2020 for all proposals apart from the DRE review trigger. By April 2021 for those affected by the DRE trigger.
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