



Annual Review of Swansea Council's Charging Policy (Social Services)

2023/24

**Summary report on work carried out on behalf of the Council,
by the Social Services Finance and Charging Policy Working Group**

December 2023 v5

1. Introduction

1.1 **Annual Review report-** sets out the finding and recommendation arising from Swansea Council's seventh annual review of social services charges to inform council policy and a revised list of charges, **due to come into effect from 1st April 2024**. This report builds on work undertaken in previous years to keep Swansea's charging fair and equal, and in line with the rest of Wales.

1.2 **Purpose and Scope of review** - the annual review is part of a programme of work undertaken during the year by the Social Services Finance and Charging group.

The annual review considers the following:

- how current arrangements are working
- whether there have been any changes in the policy context,
- operational issues in applying council policy,
- whether charges impacting on demand for social care
- what people are telling us,
- whether there are equalities impacts linked to the proposals.

The scope for the review is:

- To consider the level of inflationary uplift and minimum charging levels that should be applied to non- residential care charges in the 2024/25
- To consider whether any changes are needed to Council Policy
- To identify any next steps for year ahead

1.3 Social Services Finance & Charging Group

The Social Services Finance and Charging group is chaired by the Director of Social Services to oversee how the Council's social services manages financial process and income generation, in our work with partners and citizens. This leadership group ensures effective implementation of the Council's charging (social services) policy, taking any decisions on changes to policy and through implementing the list of charges, agreed by Cabinet. This group also monitors the

impact of the Council's charging (Social Services) policy on citizens and carers, as well as on managing the resources available to the Council.

1.4 **Swansea's approach to the Annual Review of Social Services Charges** is based on Audit Wales best practice for reviewing charging (2016), to help ensure that Swansea's charging policy continues to be based on strong principles of fairness and equality. [Charging for services and generating income by local authorities | Audit Wales](#)

The approach taken continues to embed Council's approach to achieve full cost recovery and transparency in how charges are applied and evaluated. Also, in support of the "Five Ways of working" as set out by the Wellbeing of Future Generations (Wales) Act 2016:

- Long Term
- Collaborative
- Preventative
- Integrated
- Involvement

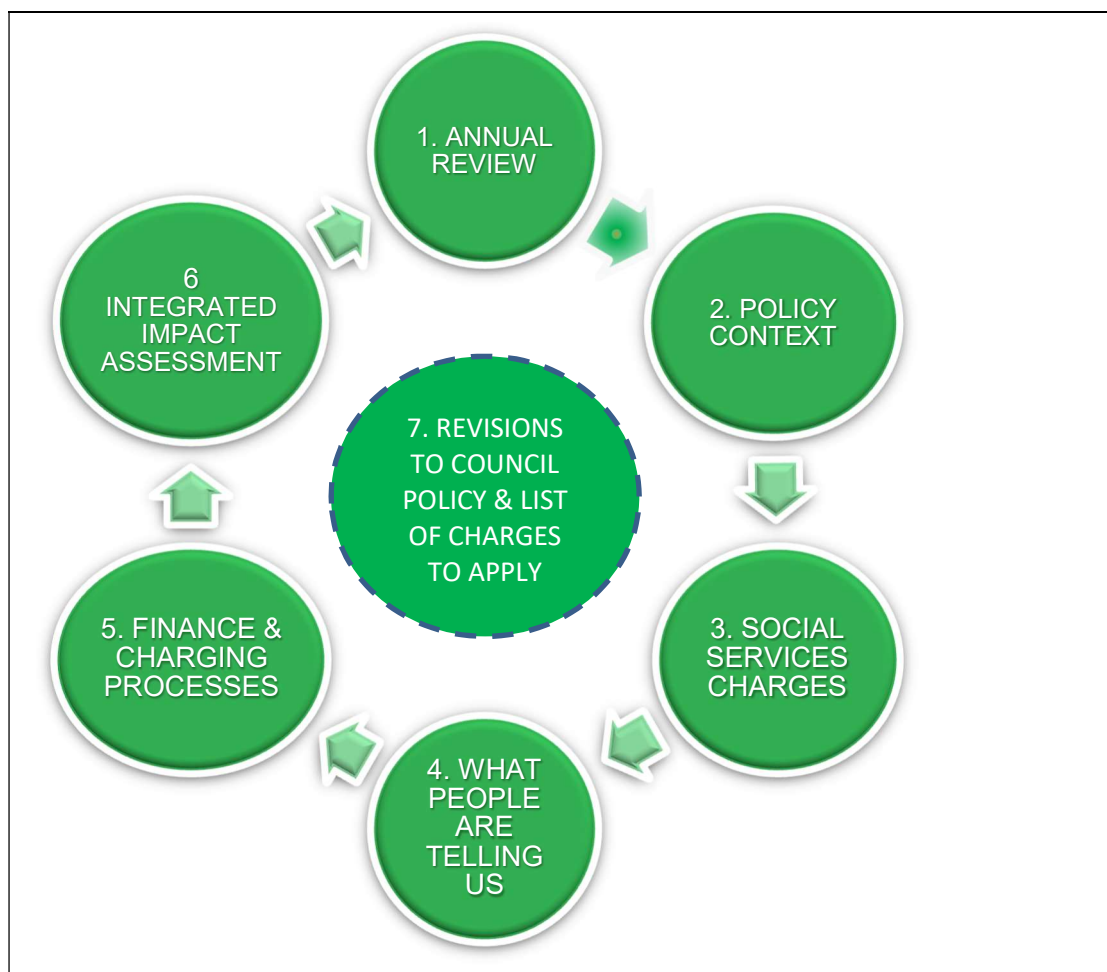


Figure 1 Swansea's approach to annual review of social services charging

1.5 **Integrated Impact Assessment** -this review applies an integrated impact assessment to consider whether the list of social services charges as proposed by the Social Services Finance and Charging group are fully taking into account the broader range of impacts on the people we serve, our communities in particular those groups with protected characteristics.

1.6 **Proposed List of Charges** - This annual review carried out on behalf of the Social Services Finance and Charging Group proposes a revised List of Charges to come into effect in 2024/25 and which are then appended to the Swansea Council's Charging Policy (Social Services) on the public website.

2. Policy Context

2.1 Social Services and Well-being (Wales) Act 2014 (Part Five)

Local authorities are empowered to charge for the care and support they provide / arrange to be provided (under sections 35 – 45 of the 2014 Act) to meet a person's needs. The charge can only relate to the 'cost that the local authority incurs in meeting the needs to which the charge applies' (s59(2)).

('the Act'), determines that a local authority can only charge individuals:

- Up to the cost of providing the service
- What the person can afford to pay for an assessed for service

These conditions are designed to ensure that local authorities do not charge for the actual assessment process – even if the person in need is a 'self-funder'.

2.2 **Statutory requirements.** Under section 59 of the Act, there are recently (amended) Care and Support (Charging) (Wales) Regulations 2015 [2], version 5 of the Part 4 and 5 Code of Practice (Charging and Financial Assessment, updated April 2020). These all determine that Welsh Local Authorities must publish their own interpretation of the relevant Social Services and Well-being (Wales) Act Code of Practice, how any discretionary powers conferred by the Welsh Government will be exercised in the year ahead and a list of charges to apply.

2.3 **Discretionary powers-** Where a council decides to charge for the care a person receives, it must do so in accordance with the regulations and codes of practice, as above. Welsh Councils retain considerable discretion on which social services are charged for, and the level of charge. The Welsh Government's social services charging policy framework requires Councils to show citizens how they intend to apply discretionary powers on charges for social services, within a charging policy.

2.4 **Statutory limits and thresholds.** The Act also states that any charges for social care cannot be set at a level higher than the cost of providing the service. That charges can only relate to the 'cost that the local authority incurs in meeting the assessed, eligible needs for managed care and support, to which the charges may apply (section 59-2).

Any changes to allowances that may apply in 2024/25, are not yet confirmed by Welsh Government, here is link to current guidance:

[Charging for social care | GOV.WALES](#)

2.5 Policy Changes within Wales

Social Care is devolved to the Welsh Government, and yet dependent on the UK Government for any additional funding to sustain the current charging and funding model.

2.5a Senedd Committee report: “Paying for care and support services (adult social care) - a guide for constituents” was published in January 2022.

[paying-for-care-a-guide-for-constituents-english.pdf \(senedd.wales\)](#)

2.5b Rebalancing Care and Support- consultation

Welsh Government’s recent public consultation on ‘Rebalancing care and support’, followed the publication of a White Paper (2021) which set out a number of proposals to “reduce complexity, increase sustainability, and strengthen integration”.

It proposed focussing on three areas for improvement:

- refocussing the fundamentals of the care market,
- reorientation of commissioning practices; and
- evolution of integration mechanisms.

2.6 Policy changes in UK

In some ways the England direction of travel is mirroring that which is already in place in Wales. Anyone who requests public funded social care must undergo a needs assessment and a means test, and only those with highest needs and the lowest financial assets are likely to receive support. Anyone with assets or capital of more than £23,250 must pay for all social care themselves.

2.7 Legal Challenges

If a person believes that the charge is ‘more than reasonably practicable’ for them to pay, they have the right to complain to the Council or to the Public Ombudsman and they are entitled to ask the Council for charges to be reconsidered. In Wales the charges for non-residential, community-based care and support are part of the national charging framework as outlined above and a person’s contribution is capped nationally at £100 per week. There have not been any successful legal challenges of social care charging policy reported in Wales this year.

[Challenging adult social care decisions in England and Wales \(equalityhumanrights.com\)](#)

3. Social Services Charges

3.1 Swansea Council's Charging (social services) policy. All charges relating to social care are covered by Swansea Council's Charging Policy (Social Services) – version 5. [Charging Policy \(Social Services\) - Swansea](#)

3.2 **Key Principles** Swansea Council aims to be clear, fair and transparent in what we charge for, and we do this by publishing an annual schedule/ list of charges, as set out in a Swansea Council Charging Policy. There are some 'fairness' issues in applying this national charging policy, which in effect imposes a charging ceiling, which can mean everyone may be charged the same regardless of wealth or amount of service received, over a certain amount. The financial assessment is carried out, to means test this approach, though still this will clearly have greatest impact on those people with less income.

3.3 **Swansea Council's financial rules** expect that paid officers work within the principle of full cost recovery, and we are continually working to improve our understanding of the costs of delivering services to the public, and the factors which cause variations in costs over a period of time, such as occupancy rates, staffing costs and inflationary pressures.

3.4 **Opportunities for Potential/ New Charges** - Welsh Government's current charging framework allows for certain discretion in charging adults for Care and Support services. In exercising this discretion, the Council must consider carefully whether any additional care and support services should to be added to the list of charges; whether within the community-based category, or by applying a flat rate, and the cost/ benefits of doing so.

3.5 List of Social Care Services not subject to charges

The following table sets out a list of Council's social care services not subject to charge, i.e. social care services not referred to in Appendix 1 List of Social Services Charges to apply in 2024/25. Many of these services have been actively considered during the past few years, and the current position of the Social Services Finance & Charging group is shown but subject to review.

Council service subject to discretion	Latest position:
Commissioning support – partners including administration cost	Via recharging
Carers support services	Not currently applied
Community Alarm Service Charges	see paragraph 3.6
Deferred Payments- administration	see paragraph 3.7
Self-funders - administration	Not currently applied
Local Area Coordination	Not currently applied
Occupational Therapy –assessment for provision of equipment & assistance	Not currently applied
Employment related services	Not currently applied
Other- Preventative	Not currently applied
Social Development Services	Not a calculated fee
Care and Housing Support	Not a calculated fee

Services to Children, Young People & Families, including Supervised Contact Foster Care, Family Support, Special Guardianship	Not currently applied
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3.6 Deferred Payments

The Council offers a deferred payment agreement to offset the bill of charges for social care, with a timetable for resolution, which may be achieved through the sale of property. The timetable is often complicated by factors such as probate, housing and the housing market. It has been the view that charging additional administration or interest costs adds more financial cost, more work for the Council and additional complications in a relatively small number of cases, for what would be a limited revenue source. The Council is considering a set-up fee to administer the deferred payment agreement, and feasibility work, including consultation will take place this year.

3.7 Community Alarms

There are **2538** Swansea Lifeline community customers (October 2023). Approximately 300 of these are connections linked to an assessed service i.e. Telecare

3.7.1 The inflationary uplift proposed for all social services changes to be applied to the Lifeline annual rental cost – to all lifeline customers (see Appendix 1 Swansea Council List of Charges (to apply in 2024/25)).

3.7.2 As part of a comprehensive service review, the proposal is to undertake consultation on the following new charges for Community Alarms (Lifeline):

- **One-off charge for installation of new alarms** for new customers
- **Replacement charging** - changes in Terms & Conditions of service to apply a charge for any replacement pendants as a result of damage or loss by the customer.

3.7.3 One-off charge for installation of new alarms for new customers

Currently no charge for installation of equipment. Actual cost of installation for all new lifeline clients is **£46** (inclusive of on-costs). A charge for installation of an alarm is standard practice for Lifeline services. There are approximately **600** new installations per year in Swansea.

3.7.4 **Replacement charging**- all customers to whom terms and conditions apply. Currently there is no charge to clients for supply of replacement pendants where existing equipment has been lost or damaged. The number of pendant replacements for loss or damage has risen year on year – in 2023 up to and including the month of October these totalled **280**.

3.7.5 Integrated Impact Assessment- Lifelines

As part of the service review, a separate Integrated Impact Assessment has been undertaken, and if consultation on these proposals is approved (see recommendations), Adult Services will report on the outcome.

3.8 **Benchmarking** - this annual review of charges has also looked at the 2023/24 charging schedules of other Welsh Local Authorities (where published) and there are several examples of Welsh Council's discretionary approaches to social services charging summarised at the end of the table in **Appendix 2**.

4. What people are telling us

4.1 Public consultation- there has been no formal public consultation undertaken this year in relation to charges, as the Council's charging (social services) policy has not changed.

4.2 Complaints/ Compliments

Social Services and Adult Services received more complaints in 2022/23, only a small proportion relate to the statement of charges, charging policy and financial assessments.

Some complaints from individuals, their carers or relatives, are directly in relation to the costs of the cared for person's care and support. Annual Reports summarising the Complaints and Compliments received relating to Adult and Child and Family Services, are reported to Governance & Audit Committee. Work is currently underway on the latest reports.

Complaints received by Corporate Complaints Team relating specifically to social services charging (e.g. unhappy with charges levied) in year			
Outcome/ Year	2020/21	2021/22	2022/23
Stage One - Justified	7	4	TBC
Stage One -Partially Justified	2	1	TBC
Stage One - Not Justified/	1	-	TBC
Stage One - Local Resolution /Other	1	-	TBC
Stage One - Not Pursued/ Informal	-	-	TBC
Stage Two - Partially Justified	1	-	TBC
Stage Two - Not Pursued/ On-going	1	2	TBC
Totals (relevant to charges)	Stage 1 = 11 Stage 2 = 2	Stage 1 = 4 Stage 2 = 3	TBC

There are also a high number of compliments praising the professional support provided, and the skills of the help given to people in accessing a range of social services.

4.3 Public Ombudsman

The Public Ombudsman cannot assess an individual's ability to pay for the cost of their care and support services, they sometimes receive complaints about related matters, which are summarised in a casebook (most recent case book 2021).

<https://www.ombudsman.wales/case-books/>

5. Finance & Charging Processes

5.1 Financial Assessment

It is important that the financial assessment is offered to the person being charged for the care and support they actually receive, and that this assessment is carried out fairly, and accurately, based on the information provided. The financial assessment takes full account of a person's income and personal expenses, and it is also important that this assessment is reviewed as the person's circumstances change, and annually.

5.2 Social Care Income and Finance Team

The Social Care Finance Team is part of the Revenues and Benefits Service within the Financial Services Department and is responsible for:

- Undertaking financial assessments of clients' contributions towards the cost of their care
- Collection of those client contributions
- Scrutiny of claims for re-imbursment from care providers
- Payments to care providers for residential and non-residential care
- Payments of Fostering and Adoption allowances including the means test that determines the allowance paid to an adopting parent
- Payment of Special Guardianship Allowances
- Payment of Direct Payments

In 2022/23, the SCIF Team completed a total of **4,865** financial assessments for both new assessments and changes in circumstances (5,011 financial assessments were undertaken in 2021/22).

Below are some highlights of the Team's activities, which are central to a sustainable adult social care model in Swansea.

- a) Community based care
 - **837** care packages were amended due to changes in the care and support plan or a change of provider.
 - **832** care packages have ended for a variety of reasons. These include changes residential care placement by service user choice, where a person, is admitted to hospital or deceased.
 - The team processed **199** respite stays in the year.
 - The team actioned **175** new Direct Payments in 22/23, **218** changes in Direct Payment P packages have been actioned and **180** Direct payments have been ended for a variety of reasons.

- b) Residential / nursing care:
 - **351** placements were terminated for a variety of reasons (for example deceased, admitted to hospital, discharged to the community or assessed as self-funding)
 - **90** placements were reassessed due to a change in circumstances (for example, upgraded to nursing or moved to an alternative home)

5.3 Income Generation

A significant amount of income is generated on behalf of Swansea Council by applying national social services charging framework within Adult Services. The following table shows trends in Income Generated over the past five years. The table does not include ‘technical income’ attributable to changes in the Direct Payment provider in both 21/22 and 22/23. This is not client income so should be excluded. Also excluded in this version of the income table is recovery of excess Direct Payment balances, as relates to a recovery of excess expenditure.

Service Category	2018/19	2019/20	2020/21	2021/22	2022/23
Community Alarms	487,686	450,380	395,850	494,843	483,117
Day Services	433,814	559,804	241,030	272,057	337,442
Direct Payments	310,536	726,901	762,551	770,769	759,874
Domiciliary Care	2,790,267	2,803,476	2,823,830	2,738,092	2,380,097
Other/Admin.	392,490	545,833	378,394	300,569	441,193
Residential Care	11,579,594	12,845,876	11,628,620	11,007,404	12,663,394
Grand Total	15,994,386	17,932,271	16,230,274	15,583,734	17,065,117

Table 3. Adult Services Yearly Analysis of income/ income related to charging by type - figures based on information within the Council’s financial ledger

Main Points from previous table:

- Significant amount of income is generated by applying national social services charging framework within Adult Services
- Actual income has increased by approx. **9.5%**, when compared with the previous year.
- This is the first increase in actual income since 2019/20.
- There is likely some residual impact on income levels arising from the pandemic, as income remains **4.8%** below that achieved in the last pre-covid year.
- There is a small reduction in income from community alarms.
- Day service income has increased as would have been expected.
- Slight reduction in Direct Payments client contributions.
- 13% reduction in domiciliary care-related income.
- Other income has increased following a drop in the previous year.
- Significant increase (£1,656k) in residential care- related income

5.4 Any projection of income expected within 2023/24 is not an exact science due to the number of variables involved, for example demand for service, changes in household incomes, and the impact on thresholds. The Social Service Performance and Financial Monitoring meeting continue monitor internal and external income as part of the budget reporting, and action taken is accordingly.

5.5 Debt Recovery / Invoicing

Considerable work has been undertaken through the year to reduce outstanding debt in social services. We are continually working with citizens, partner organisations, representatives and social services colleagues to recover these debts and make appropriate resolutions.

Effective joint working between SCIFT, Corporate Commercial and Procurement teams and the Social Services Finance officers continues to ensure that all our invoicing and debt recovery processes are working effectively.

5.6 Personal Debt / recovery

5.61 The Council recognises that a significant proportion of Council services are funded through service charges. If income is not collected effectively, then the authority will be unable to properly fund the vital services it provides for the citizens of Swansea or it will simply mean costs fall to others to pay more to make up the shortfall.

5.62 Swansea Council also recognises that early engagement from those at risk of debt or in debt, can prevent debts from escalating, reduce indebtedness and increase the ability of citizens to meet their financial responsibilities. We know that anyone can experience financial difficulties at any time and that money problems do not just affect the person in debt. Families and communities thrive when people can afford healthy lives and avoid the stress of money worries.

5.63 Swansea Councils aims to take a consistent approach to the collection of debt and supporting those who are in debt, to help reduce outstanding debts to the Council and provide the revenue to deliver services.

6. Integrated Impact Assessment

6.1 The current economic situation, as the world continues to respond to the pandemic, remains one of uncertainty, stories of personal and family struggle and public facing agencies responding quickly to each set of circumstances as they arise. This period, with the additional challenges of changes to welfare benefits, universal credit, inflation rises, specifically food, energy and fuel prices, and the costs of Brexit are having a devastating impact on some individuals, families, communities and businesses. Government support to ease these impacts during the pandemic has largely tailed off for businesses, and the fiscal priority again seems to be on reducing the public sector borrowing requirement. Additional investment in Health and Social Care was due to be funded by increases in

national insurance, and these changes have been put back. Overall, the financial outlook for all public services in Wales is likely to be extremely challenging over the next decade.

A more detailed analysis is set out in the Council's Medium Term Financial Plan.

6.2 Deprivation is an important consideration when looking at imposing charges on the care and support of our most vulnerable citizens and in support of their carers. The Wales Index of Multiple Deprivation (WIMD) is updated every 4 to 5 years. The most recent index was published in 2019, **17 (11.5%)** of Swansea's 148 LSOAs are in the most deprived 10 per cent in Wales (similar to the overall proportion in 2014). Swansea also has 8 Lower-layer Super Output Areas (LSOAs) in what is termed Deep-Rooted Deprivation; those that have remained within the top 50 most deprived – roughly equal to the top 2.6% – small areas in Wales for the last five publications of WIMD ranks. The current economic situation is likely to have greatest impact in these areas.

6.3 Overall the financial outlook coupled with high demand for social care and population changes mean that the Council continues to apply the Welsh Government's framework for local authority social services charging to ensuring the continued sustainability of our services. Swansea's corporate financial policy on setting charges still sets out an expectation on all services to aim for Full Cost recovery where possible, and to operate within the key principles set out in the Council's Transformation programme, and through objectives in the Corporate Plan 2023-28.

Actions to be taken:

- Full Integrated Impact Assessment to be completed, only if required, following a public consultation on the Council's budget 2024/25, due to commence in January.

7. Revisions to Council Charging Policy and the List of Charges to apply in 2024/25

7.1 Swansea Council Charging Policy (Social Services)

The Council's policy and this annual review process, as reflected in this report, aims to ensure that charging, where it occurs, is consistent, fair and clearly understood. Individuals when asked to pay a charge will only be required to pay what they can afford.

The current policy considers the principles set out in the charging and financial assessment framework introduced by the Act, and the relevant codes of practice.

Public Information and advice about charging is available on the council website, and leaflet, taking account of individual communication needs, on request. Swansea Council are committed to giving people a stronger voice and real control over the care and support they need, to achieve their own well-being outcomes.

Actions to be taken:

- Social Services Finance and Charging group ensures that up to date public information is available on the Council's website.
- The Charging (social services) policy is reviewed and updated regularly by the Social Services Finance and Charging group to reflect national policy and local guidance.

7.2 Changes within the List of Charges as published prior to the start of the financial year should reflect the many inflationary pressures impacting on the social care sector. The costs of providing social care services are subject to inflationary pressures. Significant changes have been made in previous years to ensure that Swansea's charging policy is consistent with most other local authorities in Wales, and that this policy is applied with fairness and equity. Unless Swansea keeps pace with inflationary increase put into place by other Welsh Local Authorities, then the gaps will reappear. Inflation (CPI) currently stands at 4.6% (to October 2023), down from 6.7% in September 2023, and having previously been as high as 10% in 2022. Whilst the Office for Budget Responsibility is forecasting a fall to 2% later this year, the impact of in year and past inflation is still being felt. Many of the household impact items, and costs associated with delivering social care, will have already increased in price.

The current inflation pressures will remain with their impact on households, providers and services through energy costs, food costs, travel cost, interest rates and higher taxation/ national insurance.

These higher costs of providing care coupled with higher social care wages to meet the real living wage, will continue to impact on the delivery of social services in 2023/24, and beyond, with a disproportionate impact on Adult Services.

Swansea Council Link: [Medium Term Financial Planning 2024/25 – 2026/27](#)

Office for Budget Responsibility: Economic and fiscal outlook – November 2023: [EFOs - Office for Budget Responsibility \(obr.uk\)](#)

Actions to be taken:

- Proposal to Cabinet, on behalf of the Social Services Finance & Charging group, is to increase all charges by **6%** to apply to all set out in the List of Charges to apply in 2024/25.
- An Integrated Impact Assessment screening has been undertaken, and this proposal is still considered to be low impact on the basis that everyone who is the subject of social services charges is offered a fair financial assessment, and then can expect to be charged within the protection of the thresholds set under the Welsh Government national charging framework.

8. Conclusions

In summary Swansea Council's annual review of social services has taken into account the following:

- Policy Annual review approach
- Social Services charging framework.
- What people are telling us.
- Continuous process improvements
- Integrated Impact.
- Comparisons with some other Welsh LAs.
- Any revisions needed.

Within the current context, it is not deemed necessary or appropriate to consult upon making any changes to the current charging policy.

9. Recommendations

Cabinet is asked to accept the findings of the annual review of changes, and that there are no new service charges **to apply in 2024/25**:

- To approve an inflationary increase of **6%** to be applied to all social services charges to come into effect on 1st April 2024.
- Cabinet to approve the list of social services charges to apply from 1st April 2024, for the year 2024/25.
- Grant permission to Adult Services for further work to be undertaken in 2024/25 on additional lifeline charging, to covering installation and replacement costs.
- The revised List of social services charges 2024/25 (Appendix 1), once agreed, is appended to the Council's Charging (social services) policy.

Appendix 1 Swansea Council List of Charges (to apply in 2024/25) v1

These are the amount clients will be charged for social care services, subject to any limits on the maximum charge specified by Welsh Government.

1. Residential Care and Support Services (Local Authority)

Council's in-house residential care service delivers a high-quality service for individuals with complex needs, and also offer placements for residential reablement and respite care.

The charges shown below are for the council-run care homes only and are only indicative of the average weekly costs of care and support, as some individuals may have additional needs to be identified and charged accordingly.

All charges for residential care are means tested. Residents may only be required to pay a contribution towards the total weekly cost. In certain circumstances, residents may be required to pay the full cost of residential care.

a) Long Term Residential Care (Local Authority)			
Charges for Services by category of care	Weekly charges in 2023/24	Weekly charges in 2024/25	% Increase/ Comment
Residential Care / Council-run only			
Elderly Care	£708.02	£750.50	6%
Dementia Care	£708.02	£750.50	6%
Mental Health	£1,855.24	£1,966.55	6%
Learning Disabilities	£1,855.24	£1,966.55	6%
Younger Adults	£1,855.24	£1,966.55	6%

b) Short Term Residential Care: respite care (Local Authority)

Charges for Services by category of care	Weekly charges in 2023/24	Weekly charges in 2024/25	% Increase/ Comment
All adults short term residential care: respite care	£100	TBC by Welsh Government	Continue to reflect Max. weekly charge set by Welsh Government

2. Non-residential, community-based care and support Services

- Domiciliary Care – is care in the client’s home provided by a private sector provider
 - Home Care – is care in the client’s home provided by the Local Authority
- All charges are means tested up to the maximum standard charge as outlined below

Charges for Services per category of care	Charges in 2023/24	Charges in 2024/25	% Increase/ Comment
All adults Non-residential, community-based care and support Services			
Domiciliary Care or Home Care, including respite at home, supported living	£21.87 per hour	£23.18 per hour	6%
Older Persons Day Services	£50.82 per day	£53.87 per day	6%
Day Services Younger Adults /Special Needs Day Services	£63.56 /day	£67.37 per day	6%

3. Flat rate charges for other services provided by Swansea Council

These social care charges for Council run services are discretionary, and are **not** subject to a means test, or a maximum weekly charge.

Charges for Services per category of care	Charges in 2023/24	Charges in 2024/25	% Increase/ Comment
Adult social care charges for Council run services			
Community Alarms (Lifelines)	£165.88 exclusive of VAT £199.00 inclusive VAT (Annual)	£175.83 exclusive of VAT £210.94 inclusive VAT (Annual)	6% https://www.swansea.gov.uk/communityalarms
Meals (within community-based, day services)	£4.46/ day	£4.73/ day	6%
Court of Protection Deputyship	Court of Protection Deputyship charges as set in law by the Ministry of Justice	Court of Protection Deputyship charges as set in law by the Ministry of Justice	
Pre-Deputy support charge	£5 per week	TBC	6%

APPENDIX 2: COMPARISON WITH OTHER WELSH LOCAL AUTHORITIES

- a) Table showing latest available information about how Swansea's social services charges compare to selected other Welsh Local Authorities. This year due to Covid, information has been collated and updated following a web search for the following service areas:

Local Authority Social Services Charges to 2023/24	Home Care (subject to weekly charge)	Day Care (subject to weekly charge)	Direct Payments	Residential Care Long Term /Temp Elderly/ week	Residential Care Short Term/ Respite (Telecare/ Lifeline (per week)	Other (per day)
Swansea (2023/24) <u>Updated</u>	£21.87 per hour	£50.82/ day- older people £63.56/ day- adults	Variable	£708.02- older people £1,855.24 - learning disability £739.85- Nursing	£100 (Max weekly charge applies to respite only)	Lifelines: flat rate annual charge £165.88 exclusive of VAT or £199.00 inclusive of VAT	Meal £4.46 Pre-Deputy Support = £5 per week
NPT <u>Updated but no figures available</u>	£20 per hour	£36 per attendance	Value of direct payment	£459 Adult Family Placement £882.76 (Pobl charges to new residents)	£100 (Max weekly charge applies)	£5.70 (LL- Extra)	
Bridgend CC <u>Updated- published list of charges is for 2022/23: CPI may have applied to these rates</u>	£20.92	£37.29 / day £70.26/ day	Variable	Remodelling	£100 (Max weekly charge applies)	£6.55/ week (one person in household)	Meal - £5.66 Tea/snacks £1.69

Local Authority Social Services Charges to 2023/24	Home Care (subject to weekly charge)	Day Care (subject to weekly charge)	Direct Payments	Residential Care Long Term /Temp Elderly/ week	Residential Care Short Term/ Respite (Telecare/ Lifeline (per week)	Other (per day)
Carmarthenshire CC <u>Updated</u>	£20.00 per hour (community support)	£19.55 per session	PA rates £14.50 per hour/£110.80 per night	N/a	£100 (Max weekly charge applies)	Telecare £4.20 per week £18.77 per quarter (lifeline only) £53.70 per quarter (monitor & pendant)	Meals/ snacks £8.50 in day service Community Meals £6.00 Laundry £3.10 per load
Powys CC <u>Updated</u>	£23.50 per hour	£15.00 per day Attendance at day and employment services: £15.00 per day	£12.85 per hour PA rate £17.26 per hour Micro enterprise £19.70 per Hour agency rate	N/a	£100 (Max weekly charge applies)	Careline Programming & Installation = £48	Meal £7.50 24-hour support (supported tenancy): £100 per week
Pembrokeshire CC <u>Updated</u>	£21.12	£32.49 (PPC- run)	Home and Community Services rate = £15.71 Day Opportunities= £53.55/day	In house residential = TBC (£722.11) In house residential EMI = TBC (£786.21)	£100 (Max weekly charge applies)	£2.24- with Disablement Exemption Certificate £2.69 -without Disablement	Meal- TBC Appointeeship Administration Charges = £10 Deferred Payment

Local Authority Social Services Charges to 2023/24	Home Care (subject to weekly charge)	Day Care (subject to weekly charge)	Direct Payments	Residential Care Long Term /Temp Elderly/ week	Residential Care Short Term/ Respite (Telecare/ Lifeline (per week)	Other (per day)
						Exemption Certificate	Administration Set-up Cost (One-off charge)= £500
<u>RCT</u> <u>Updated- public information still showing 2022/23 rates</u>	£17.00/ hour	£17 per day	£10.00 per hour	Determined on individual basis	£100 (Max weekly charge applies)	£143.98 p.a	Minimum weekly charge = £4.05 per week

APPENDIX 3. INTEGRATED IMPACT ASSESSMENT SCREENING FORM

Please ensure that you refer to the Screening Form Guidance while completing this form.

Which service area and directorate are you from?

Service Area: Swansea Council

Directorate: Social Services

Q1 (a) What are you screening for relevance?

- New and revised policies, practices or procedures
- Service review, re-organisation or service changes/reductions, which affect the wider community, service users and/or staff
- Efficiency or saving proposals
- Setting budget allocations for new financial year and strategic financial planning
- New project proposals affecting staff, communities or accessibility to the built environment, e.g., new construction work or adaptations to existing buildings, moving to on-line services, changing location
- Large Scale Public Events
- Local implementation of National Strategy/Plans/Legislation
- Strategic directive and intent, including those developed at Regional Partnership Boards and Public Services Board, which impact on a public bodies functions
- Medium to long term plans (for example, corporate plans, development plans, service delivery and improvement plans)
- Setting objectives (for example, well-being objectives, equality objectives, Welsh language strategy)
- Major procurement and commissioning decisions
- Decisions that affect the ability (including external partners) to offer Welsh language opportunities and services
- Other

(b) Please name and fully describe initiative here:

Annual Review of Swansea Council's charging (social services) policy 2023/24, and list of charges to apply in 2024/25.

This the seventh annual review of social services charging was carried out on behalf of the Social Services Finance and Charging group, chaired by the Director of Social Services.

This IIA screening covers both the Annual Review of Charges (Social Services) report which sets out any changes within Swansea Council's Charging Policy (Social Services), and the proposed List Of Charges to be applied in 2024/25.

The main change to take effect from 1st April 2024 is that all social services charges are to be increased in line with current inflation and forecasts; this represents an uplift of 6% There are no new charges proposed by this annual review.

Clearly there are some impacts arising from applying an inflationary uplift within the Council's charges (on social care) However all social service non -residential charges are set within a national legislative framework, and in compliance to regulations and code of practice as set by Welsh Governments, namely within Parts 4 and 5 of the Social Services and Well-being (Wales) Act 2014, henceforth 'the Act'.

Under the Act, citizens to whom the charges apply are protected by some important policy entitlements:

- right to be offered a financial assessment to consider whether they have the means to pay a contribution to the costs of their social care and support
- there are clear principles that a person's ability to pay should not precluding access to care and support or that the charges for care and support should not exceed the costs of provision
- there are personal thresholds set by the Welsh Government: namely a maximum weekly charge to be set at £100 per week,
- Capital and Personal income allowances are also set for people who are subject to charges in relation to residential care.

Q2 What is the potential impact on the following: the impacts below could be positive (+) or negative (-)

	High Impact		Medium Impact		Low Impact		Needs further Investigation	No Impact
	+	-	+	-	+	-		
Children/young people (0-18)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Older people (50+)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Any other age group	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Future Generations (yet to be born)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Disability	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Race (including refugees)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Asylum seekers	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Gypsies & travellers	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Religion or (non-)belief	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Sex	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Sexual Orientation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Gender reassignment	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Welsh Language	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Poverty/social exclusion	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Carers (inc. young carers)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Community cohesion	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Marriage & civil partnership	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Pregnancy and maternity	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Human Rights	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The evidence for a low impact would be the local implementation of a national statutory framework which was equalities impact assessed prior to implementation in 2026. Swansea Council in carrying out an annual review of its own social services charging policy is demonstrating best practice. The policy is implemented within a clear set of principles, and the offer of a financial assessment to all social services clients. The annual review process considers any feedback including any relevant social services complaints received within the past year. Swansea Council implements a fair and compassionate approach to debt recovery in relation to charges.

Q3 What involvement has taken place/will you undertake e.g. engagement/consultation/co-productive approaches?

Please provide details below – either of your activities or your reasons for not undertaking involvement

Swansea Council is complying with its duties under the Social Services & Wellbeing (Wales) Act 2014 which allows local authorities to exercise discretion and to work within the principles of fairness, transparency and equality. It is a

statutory requirement under Parts 4 & 5 of the Social Services & Well-being (Wales) Act 2014 for local authorities to reflect and update these charges in a clear and transparent way, demonstrating fairness and equity to Swansea citizens.

All charging thresholds/ limits to the Councils charges are set by the Welsh Government, and these are in place to protect citizens against poverty and social exclusion. Welsh Government undertook a full EIA of the Charging framework (December 2016):

[equality-impact-assessment-part-5-the-social-services-and-well-being-wales-act-2014.pdf \(gov.wales\)](#)

There have been no significant changes to the national charging framework or local social services policy since the implementation of the Act. However due to the unprecedented national rate of inflation, and its impact on social care, there are wider questions about the funding of social care in Wales to be considered nationally,

Q4 Have you considered the Well-being of Future Generations Act (Wales) 2015 in the development of this initiative:

- a) Overall does the initiative support our Corporate Plan's Well-being Objectives when considered together?
Yes No
- b) Does the initiative consider maximising contribution to each of the seven national well-being goals?
Yes No
- c) Does the initiative apply each of the five ways of working?
Yes No
- d) Does the initiative meet the needs of the present without compromising the ability of future generations to meet their own needs?
Yes No

Q5 What is the potential risk of the initiative? (Consider the following impacts – equality, socio-economic, environmental, cultural, legal, financial, political, media, public perception etc...)

High risk

Medium risk

Low risk

Q6 Will this initiative have an impact (however minor) on any other Council service?

Yes

No

If yes, please provide details below

Q7 What is the cumulative impact of this proposal on people and/or communities when considering all the impacts identified within the screening and any other key decisions affecting similar groups/ service users made by the organisation?

(You may need to discuss this with your Service Head or Cabinet Member to consider more widely if this proposal will affect certain groups/ communities more adversely because of other decisions the organisation is making. For example, financial impact/poverty, withdrawal of multiple services and whether this is disadvantaging the same groups, e.g., disabled people, older people, single parents (who are mainly women), etc.)

The Council's Charging policy (social services) was agreed by Council in March 2016, following a full Equalities Impact Assessment, which was carried out to consider and consult on how the policy is applied to all client groups that are able to access residential and non-residential community care services.

A full EIA was completed in 2016/17 to support the introduction of new charges to Day Services and Respite Care in Swansea Council, to bring the Council in line with other Welsh Local Authorities. Also last year (2022/23), a full EIA was completed to reflect the high inflationary impact (10%) on all citizens and populations groups.

Any impact on individual or population groups with protected characteristics is mitigated by the Welsh Government's national charging framework which sets out the minimum income allowances, capital thresholds and weekly charging caps.

No new charges for social services to existing clients have been introduced in 2023/24, or proposed charges for 2024/25. The new charges proposals relate to installation of community alarms to new clients, reflecting the Council's financial principle of full cost recovery. Also, to impose a replacement cost to all clients for lost/ damaged equipment. These proposed changes will be under consideration in 2024/25 following a full-service review and consultation in approved, to be reported on separately.

This year the annual review of charges carried out this year is proposing a 6% inflationary increase to charges, to reflect increasing costs of social care, to come into effect on 1st April 2024, in line with other Council charges.

Swansea Council's Charging (Social Services) policy has only been updated to reflect the current national policy/ links, with no changes proposed to the local approach or discretionary areas.

Outcome of Screening

Q8 Please describe the outcome of your screening below:

- **Summary of impacts identified and mitigation needed (Q2)**
- **Summary of involvement (Q3)**
- **WFG considerations (Q4)**
- **Any risks identified (Q5)**
- **Cumulative impact (Q7)**

• **Summary of Impacts (Q2)** Impacts are low on specific groups, due to the nature and purpose of the annual review of charging report, in that there are no new or additional charges. No specific direct negative impact has been identified, during this annual review of Charging policy.

The mitigation of the burden of charges is controlled by Welsh Government who set thresholds for personal allowances and caps on the maximum weekly charge. If service users are charged too much for their services, there is always the risk that they or their carers may decide they can no longer attend. There is little evidence that there has been a significant number of people leaving community-based support services due to charges being applied. Swansea Council has a complaints process which allows citizens to communicate their views about the service and any unhappiness they may have about their experiences, and recourse to this channel has been considered in this report. If citizens are charged too little, then this could impact on the service offer and the availability of social care in future years.

• **Summary of involvement (Q3)** Involvement with citizens takes place on an individual basis, through their social worker, their care and support assessment, and their individual financial assessment processes. Each of these activities are person-centred, and delivered through collaborative communication. Council managed activities such as financial assessment help to reduce any lack of fairness in how charging is being applied or between different forms of care and support which a charge may apply.

Social Services also work closely with other departments (Finance, Legal and complaints) in the Council with our Health partners and with social care providers.

The Council's Charging policy aims to promote fairness, consistency, and transparency in how a person is made aware, via a statement of a charge, how they are financially assessed for the charges, and how a request for payment is made. This clear policy has helped to promote a more informed and clearer relationship between local authority and people who are charged for their care and support.

The Annual Review of Charges considers whether any further improvements are needed to the management of the care and support assessment and financial assessment process to support the implementation of the Council's Charging policy. This work is overseen by the Social Services Finance & Charging group, which meets monthly.

• **WFG considerations (Q4)** Well-being of Future Generation support a sustainable approach to the planning and delivery of adult social care. By applying the Welsh Government's national charging framework, and threshold with fairness and transparency, the Council is ensuring resources are available for care and support services to promote the wellbeing of individuals, carers and families in the present, and for the future.

• **Any risks identified (Q5)**

The risk to the Council would be a through legal challenge or complaints, though this risk is reduced by minimising changes to the current social services charging policy. Social Services Finance and Charging group continually monitors and improves current arrangements in applying Charging policy, and the risks to the Council, taking action to apply any changes needed to current policy or processes, through its work programme.

We aim to ensure that sufficient, up to date public information is made available on charging for social care in a suitable format, and in the Welsh Language, that service users can access. This information, and the List of Charges to apply, is updated following consideration of the annual review of charging report by Cabinet.

• **Cumulative impact (Q7).**

Charging for social care may add to the financial burden of individuals, families and un-paid carers. We apply a set of core principles within the Councils Charging – social services policy to ensure that individual circumstances are fully taken into account.

Tackling Poverty service is part of the Council’s Social Services directorate and their vital work in areas such as Welfare rights, Benefits training, Poverty and Prevention strategies and targeting financial advice is having a positive impact. A report on the Tackling Poverty team’s activity and performance is considered by the monthly Social Services Performance & Financial Monitoring meeting.


(NB: This summary paragraph should be used in the relevant section of corporate report)

Full IIA to be completed

Do not complete IIA – please ensure you have provided the relevant information above to support this outcome

NB: Please email this completed form to the Access to Services Team for agreement before obtaining approval from your Head of Service. Head of Service approval is only required via email.

Screening completed by:
Name: Simon Jones
Job title: Social Service Strategic Performance & Improvement Officer
Date: 4th January 2024

Approval by Head of Service:

Name: David Howes
Position: Director of Social Services
Date: 4th January 2024

Please return the completed form to accesstoservices@swansea.gov.uk