

## **Report to Health and Adult Social Care Scrutiny Committee**

**21 January 2022**

### **Financial Assessments Improvement Programme**

#### **Report by Interim Deputy Director of Finance**

**Electoral division(s): All**

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#### **Summary**

This report provides an overview of the improvement programme put in place to develop the quality of customer service provided as part of the financial assessment for people in receipt of adult social care and support. The report details progress in responding to the issues and concerns arising from the financial assessment review process undertaken during 2021, as well as further details about the themes identified contributing to these issues, the actions taken to date and the plans for further development in the future.

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#### **1 Background and context**

- 1.1. In 2018/19 as part of the Adults' Services medium-term financial savings plan it was agreed to increase client contributions (income) by reviewing the level of Minimum Income Guarantee (MIG), used in the financial assessment of working age customers' contribution towards the cost of the social care and support package. At the time the Council provided a more generous MIG amount than the statutory minimum for this cohort of customers, as a discretionary local decision allowed under the national regulations. The proposal was to reduce to the MIG amount defined as the statutory minimum in the Local Authority Circular (LAC), bringing this group of customers into line with the pensioners who were already being assessed at this rate.
- 1.2. Following public consultation, Member scrutiny and a Cabinet Member decision, it was agreed that, as from April 2019, all new working age customers would be assessed using the statutory minimum MIG amount. A subsequent officer decision was taken in June 2019 to delay the implementation of the new rate until October 2019 to prevent steep increases in customer contributions and a transitional cap was applied for all current customers at their annual reassessment (£5 for a single person and £8 for couples). This cap was due for review in March 2020.
- 1.3. The reassessment of all customers and the review of the cap did not occur in March 2020 for two reasons, firstly the Covid19 national emergency restricted the opportunity to undertake financial assessments and secondly, as a

consequence of the decision to insource Service Finance; which was completed in August 2020.

- 1.4. A working group involving both Adult Social Care and Finance officers met in November 2020 to consider how to progress with completing the implementation of the decision made by Members. The group considered the risks posed to the service and it was agreed that the lifting of the cap and full rate charging of customers for 2020/2021 would commence with any change to the charge being with effect from January 2021.
- 1.5. As the reassessment programme took place the following issues were identified:
  - Not all non-residential customers had been fully financially reassessed for the period 2019/20.
  - Many had only had a percentage increase applied to their financial assessment, based on the national welfare benefit rates increase, for a number of years.
  - Many reassessments identified that there had been changes in the financial circumstances of individuals which had not been reflected within the financial assessment, for example increases in income arising from receiving additional benefits or pensions.
  - Between April and August 2020, the point that Service Finance was insourced, no customers had been financially reassessed.

The consequence of the change in the value of the MIG and the identified issues highlighted above in relation to the reassessed financial assessments led to a significant number of complaints being raised, including representations being made on behalf of individuals and families by councillors, Healthwatch, advocacy organisations and MPs.

## 2 Details

- 2.1. As a consequence of the findings from the officer working group, addressing the issues raised by individuals and/or their representatives and the initial review of business processes upon the insourcing of Service Finance, it was clear that there was a need for an improvement programme to be implemented.
- 2.2. A number of priorities were set to be addressed by the improvement plan, as follows: -
  - Addressing and resolving the complaints received as a consequence of the reassessment process.
  - Improving communications and documentation supporting the financial assessment process.
  - Contribute proactively to the review of the Charging Policy, led by Adult Social Care, with particular focus upon the practice and process of approving Disability Related Expenses and Housing Related Expenses.
  - Review and develop the processes underpinning the accessibility and attractiveness of Direct Payments with a pre-paid card, with a view to promoting independence, safeguarding the security of individuals, their care and support funds and payments, minimising bureaucracy and increasing transparency.
  - Review Debt Recovery processes to support more timely communication with individuals or their representatives, joining-up previously isolated services prior to the in-sourcing of Service Finance.
  - Review business processes underpinning financial assessments to deliver improved efficiency and release capacity for more effective communication and interaction with customers.
- 2.3. Addressing and Resolving Issues Arising from the Reassessment Process.
  - 2.3.1. The implications arising from the change to the value of the MIG were added to by the need to manually update financial assessments to reflect annual increases in welfare benefit rates. In recognition of the size of these tasks and the impact of the pandemic upon workloads, additional resource was procured from Civica to supplement the assessment team resources, with the aim of all customer re-assessments being completed by March 2021.
  - 2.3.2. A nominated Welfare Benefits Advisor (WBA) and the newly appointed WBA team manager worked alongside Civica to set up the project and manage communications both with customers who had queries, internal colleagues impacted by the reassessments and the Contact Centre who would initially be the recipients of any calls. A WBA duty telephone line was set up for customers to be referred to for more detailed enquiries about specific aspects of the financial assessment calculation, whilst a set of FAQs (Annex 1) was produced.
  - 2.3.3. Of the total non-residential working age cohort of approximately 3,750 people there were approximately 750 issues or appeals raised following the reassessment process, equating to 20%. The number of outstanding issues now stands at 174, which relate to either matters which are the subject of

on-going discussion between the Council and the individual or where the Council has been unable to make contact with, or get a response from, the individual or their representative.

2.3.4. To address this situation for the future, an additional six new team leader posts were recruited in July 2021 to increase the capacity available and to provide additional senior experience, knowledge and leadership. The insourced staff and teams were brought within a more joined-up Operational Finance function, including a new Operational Finance Manager being appointed in October 2021 to lead and deliver the transformational change required, who reports directly into the Deputy Chief Finance Officer to ensure strategic oversight.

2.4. Improving Communications & Documentation of the Financial Assessment Process.

2.4.1. It was clearly recognised that the communication of what is a highly complex financial assessment process, reflecting national Care Act (2014) guidance and policies, the national welfare benefit system which is still in transition to the universal credit system, the local charging policy and the individual financial circumstances of each individual, including disability related and housing related expenses needed to be improved significantly. This is not a project that will be completed overnight but will need to be a continuous process, working with individuals, their representatives and other interested stakeholders, including Healthwatch, Independent Lives and similar organisations.

2.4.2. This improvement journey has begun, with a series of regular, scheduled collaborative discussions underway with Healthwatch, whereby there will be the opportunity for the Council to benefit from the feedback and comments provided by Healthwatch during the production of communications and public information. This has already borne some initial progress, whereby the Council took part in a Healthwatch webinar and the subsequent collation of a published Question and Answer document about the Financial Assessment process. The webinar featured short presentations by the Council, the Equalities & Human Rights Commission and Citizens Advice on the subject of

- What to do if you have concerns over what you have been asked to pay.
- How to gain the confidence to discuss the process and disability costs you have.
- What resources and communication are needed to make sure your individual circumstances are understood.

2.4.3. The presentations were followed by an extensive Question and Answer session, with the questions raised by members of the public. The Council shared a summary diagram of the financial assessment process and details of who to contact at different stages within the process, which can be seen at Annex 2. The vast majority of questions were directed towards the Council and were answered comprehensively, with the full details subsequently shared with all attendees by Healthwatch.

2.5. Review of the Charging Policy

2.5.1. Adult Social Care is leading on a review of the current Charging Policy ahead of March 2022. Operational Finance has already provided input into this review and will continue to work collaboratively with Adult Social Care to support this piece of work, including in relation to decisions and communications relating to disability related and housing related expenses.

2.5.2. Clearly there are also significant changes on the horizon, arising from the Government's recent People at the Heart of Care White Paper. Operational Finance will be at the heart of the implementation of these reforms within West Sussex, recognising the clear links between different aspects of the proposed reforms including financial contributions, access to information and advice and workforce development.

## 2.6. Accessibility of Direct Payments via a Pre-Paid Card

2.6.1. Operational Finance has established a project to develop the information and awareness of the potential benefits arising from direct payments utilising a pre-paid card. A direct payment can be used by an individual to maximise their choice and control over the provision of the care and support procured to meet their assessed care needs. In addition, if the direct payment is funded via a pre-paid card there can be additional benefits, for example in safeguarding an individual's control and access to the funds whilst maximising the flexibility available to them in accessing those funds, whether in cash, cashless, online, over the telephone or face to face. This also supports an individual's ability to remain within their community without any possibility of stigmatising them as a consequence of receiving funding from the local authority. This approach also reduces the administrative burden on individuals, since the need for receipts and statements to underpin the use of direct payments is largely, if not completely, possible from within the pre-paid card system.

2.6.2. The Council will also benefit from more people utilising pre-paid cards, uploading payments online is a more efficient, timely and secure means of making payments to individuals, whilst simultaneously providing a potential additional safeguard against individuals experiencing difficulties with care and support, i.e. it would be possible to identify where activity was significantly different from the care plan, which could potentially indicate the need for further contact from social work teams.

## 2.7. Review of Debt Recovery Processes

2.7.1. The objective with this aspect of the improvement plan is to introduce more joined-up working across the Finance functions and with Adult Social Care, ensuring that there is a more proactive approach to managing the debt arising from Adult Social Care financial contributions, both in the interests of the Council but also the individual, recognising that it is in nobody's interest for debts to accumulate in an uncontrolled manner. This will ensure that there is more effective and coordinated communication and action when there is a challenge raised against a financial assessment and/or the need to investigate the specific circumstances impacting upon the affordability of an assessed financial contribution.

## 2.8. Review Business Processes to Improve Communication & Interaction

- 2.8.1. The Operational Finance Manager is working collaboratively with colleagues within Adult Social Care to deliver improvements designed to:
- Create a standard operating model governed by a set of standard procedures
  - Review the councils charging policy and practice
  - Update business processes and client information recording
  - Initiate clear monitoring and reporting practices
  - Improve customer letters and communications.
- 2.8.2. Financial assessments need to be updated annually to reflect changes in welfare benefit rates, currently this is a manual process which takes considerable resource, both in terms of staff capacity and time. Automation of this system will remove the issue of customers receiving backdated charges (a long-standing complaint) and consequently improve the transparency, communication and relationship with individuals whilst supporting better financial planning and cashflow.
- 2.8.3. Subject to further upgrading and development of the Adult Social Care database, it is anticipated that a customer portal can be implemented that will facilitate further improvements in communication channels.
- 2.8.4. All of the improvements identified above will support the releasing of capacity within the existing staff group to support workforce development, thus underpinning a more sophisticated customer service relationship, ensuring that signposting individuals towards good quality information and advice in a timely manner based upon an informed and up to date understanding of the individual's financial circumstances is at the heart of the service delivered.
- 2.8.5. In time, it is also an aspiration to introduce more engagement with service users and advocacy organisations to gain more timely feedback and reviews of customer service, including via mystery shopping, reflecting the need for improvement to become a continuous process.

### **3 Other options considered (and reasons for not proposing)**

- 3.1. It was clear that there was a need for improvement in the services delivered, therefore the focus was upon what could be improved and where priorities should be relative to one another, as opposed to whether there should be an improvement programme or not.
- 3.2. The prioritisation reflected above seeks to achieve an appropriate balance between short-term and longer-term improvements. The programme also needs to dovetail with related development projects within Adult Social Care and Finance, for example developments of the MOSAIC database, the replacement of the Council's financial management system and the Government's White Paper Reforms.

### **4 Consultation, engagement and advice**

- 4.1. Consultation, engagement and advice will be sought on an on-going basis across Finance and Adult Social Care internally and Healthwatch and Independent Lives externally. As the improvement plan develops and capacity

permits, this engagement and consultation will be expanded to engage directly with individuals and their representatives with the aspiration to introduce mystery shopping to support on-going improvement and feedback.

## 5 Finance

5.1. The improvement programme is being delivered from within existing budgets and resources, therefore there are no financial implications arising from this proposal.

5.2. The effect of the programme:

### (a) How the cost represents good value

The improvements will deliver an enhanced quality of service to the public, whilst also improving the efficiency and effectiveness of business processes within the Council. This will release staff capacity to continue the improvement and provide better engagement, information and signposting to appropriate advice and support.

### (b) Future savings/efficiencies being delivered

There will be efficiencies gained in terms of improved business processes and effectiveness in delivery of the service, but these are likely to be non-cashable efficiencies which will not produce savings against the existing budget.

### (c) Human Resources, IT and Assets Impact

Workforce development will be part of the improvement journey, capacity for which will be, in part, released by more effective use of IT in automating some of the existing business processes.

## 6 Risk implications and mitigations

Risk	Mitigating Action (in place or planned)
The on-going pandemic could impact upon the staff capacity to support the improvement journey.	The Operational Finance Manager is a member of the Finance Senior Management Team and also has scheduled, regular improvement meetings in place with Adult Social Care and Healthwatch to monitor progress.
Staffing vacancies within Operational Finance could impact upon the capacity to deliver improvements as quickly as desired.	The Operational Finance Manager is engaged in a number of recruitment campaigns currently to address the vacancy situation with the support of the HR Recruitment Team. The potential use of interim resources to address specific skill gaps is being kept under review.
Some of the improvements are dependent upon other developments within Finance or Adult Social Care.	The Operational Finance Manager is a member of the Finance Senior Management Team and meets regularly with Adult Social Care colleagues to ensure that the projects are effectively coordinated.

## **7 Policy alignment and compliance**

- 7.1. The improvement programme will complement and support the development of a revised charging policy by Adult Social Care and the implementation of the Government's planned Adult Social Care reforms. In the meantime, the improvements will support the delivery of services in line with the existing statutory duties set out within the Care Act 2014.

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### **Appendices**

Annex 1 – Frequently Asked Questions

Annex 2 – Financial Assessment Customer Journey

**Background papers** - None