

## REPORT TO ABERDEENSHIRE INTEGRATION JOINT BOARD – 30 AUGUST 2017

### IMPLEMENTATION OF PAYMENT CARDS FOR DIRECT PAYMENTS

#### 1 Purpose of report

The purpose of this report is to:-

- 1.1 Provide the members of the Integration Joint Board with information in relation to the roll out of payment cards to recipients of Option 1 & 2 Self Directed Support payments.

#### 2 Risk

- 2.1 Systems currently in place are not sufficient to allow financial monitoring of the use of Direct Payment (Option 1 & 2) budgets at a level and frequency that we would seek. This results in the potential misuse of funds going undetected, unused funds not being recovered by the Local Authority and inaccurate forecasting of budgets. These are financial risks and have been highlighted as an area of concern by internal audit. The implementation of a payment cards system will reduce these financial risks.

#### 3 Background

- 3.1 Direct payments were first introduced in 1997 under the Community Care (Direct Payments) Act 1996. Further to this the Social Care (Self Directed Support) (Scotland) Act 2013 came in to effect in April 2014. These pieces of legislation place a duty on the Local Authority to offer Direct Payments as one of the alternatives to traditional models of care provision.
- 3.2 Since the implementation of the Self Directed Support (SDS) legislation, there has been a steady increase in the number of Direct Payments being provided. These figures are expected to continue to rise over the coming years as service users receiving traditional services decide to use different approaches, contained as the 4 options in the 2013 Act.
- 3.3 Under an Option 1, the service user will direct their own care and support. The Health and Social Care Partnership, through the Local Authority, will pay an agreed sum of money (a personal budget) to the service user (or representative) to allow them to purchase their own care and support.
- 3.3.1 Under current procedures, service users who have chosen to receive an Option 1 payment are required to open a bank account to receive the payments and to purchase their care and support. They may also choose to have an element of their personal budget paid to a payroll company who will manage any payroll duties on their behalf.
- 3.4 Under an Option 2, the service user will direct their own care and support. The Local Authority, under Direction from the Health and Social Care Partnership, will

pay their personal budget to an organisation who will purchase the care and support on behalf of the service user. This may include the booking of activities and trips as agreed in their support plan.

- 3.5 Under an Option 3, the service user will ask the Health and Social Care Partnership to choose and arrange their care and support on their behalf. The care and support can be provided from in-house services, or organisations that the H&SCP contracts with to provide care and support. The H&SCP will arrange payment for these services on behalf of the service user. An Option 3 cannot be used for employing staff or purchasing services from organisations that the Local Authority, on behalf of the H&SCP, does not hold a contract with.
- 3.6 Under an Option 4, the service user can choose to have a mix of Options 1-3 to suit their individual needs. For example they may choose to employ a Personal Assistant under Option 1 to provide care at home, and ask the H&SCP to arrange attendance at a day-care centre under an Option 3.
- 3.7 As specified in CIPFA (The Chartered Institute of Public Finance & Accounting) guidance, each Local Authority has a responsibility to monitor how Direct Payment money is being used and take action if not being used appropriately.
- 3.8 Under current procedures, recipients of Option 1 & 2 payments are required to complete regular financial monitoring returns detailing how their budget has been used, and submit to their practitioner. They are also required to submit copies of bank statements and retain all receipts.
  - 3.8.1 Feedback from service user representatives has shown that service users find the completion of the returns to be very time consuming. Some have found them to be daunting, and this can put some people off choosing to receive a direct payment. This goes against the spirit of Self Directed Support, which should allow the service user greater choice and flexibility on how their care and support is managed.
  - 3.8.2 Some service users experience difficulty opening a bank account due to them having a poor credit rating or lack of acceptable identification. Some also experience problems where a representative (e.g. a family member) has been nominated to manage the budget on behalf of the service user. In some cases the bank will not open a bank account for the service user for the purposes required.
  - 3.8.3 There are other areas of weaknesses associated with the above process. It is very time consuming for practitioners and finance staff. Research has shown that financial monitoring is rarely submitted on time, if at all, which results in finance staff and practitioners spending a great deal of time chasing up overdue returns.
  - 3.8.4 In addition, finance staff have significant backlogs in received returns waiting to be actioned, which means that it may be some time later before any areas of concern are addressed, in some cases months. These backlogs are due to the labour intensive nature of the paper based process. This also means that the Aberdeenshire Health & Social Care Partnership (AHSCP) staff are unable to monitor how personal budgets are being used, and are unable to identify and recover any surplus funds in bank accounts.
  - 3.8.5 All of these weaknesses in our procedures can cause distress for the service user. It can also contribute to strained relationships between the service user and their practitioner.

The time spent discussing overdue returns is valuable quality time that could be better used on the review of their support plan. In addition, it is not uncommon for a service user to contact members of staff asking how they can pay back surplus money as it is causing them concern that we have not yet asked for it to be repaid.

- 3.9 In addition, as Option 1 payments are paid to the service users (or representative) own bank account, this can cause complications. The Supported Persons Agreement signed by the Direct Payment recipient states that accrued or unspent funds can be recovered by the Local Authority. However, from a legal perspective, these funds become the property of the Direct Payment recipient as soon as they enter their own bank account. This means that adherence to this part of the Supported Persons Agreement is at the discretion of the recipient.
- 3.9.1 This also means that in cases where the recipient has passed away, the funds are automatically frozen and tied in with their estate. It can take some time for the funds to be recovered, if at all.

## 4 Payment Cards

- 4.1 Members of the Aberdeenshire Self Directed Support team have been exploring alternative financial monitoring methods for some time, as part of the SDS project.
- 4.2 Investigations have shown that other Local Authorities (both in England and Scotland) have experienced similar difficulties with financial monitoring. Many of them have implemented a payment card system for Option 1 & 2 payments which has proven to be successful in solving the problem areas highlighted.
- 4.3 Investigations have also shown that the implementation of a payment card system has removed some of the barriers which may have prevented service users from choosing to receive a Direct Payment. Removing these barriers ensures that people who wish to manage their own care and support are given the opportunity to do so. It is anticipated that introducing a payment cards system could help to increase the uptake of Option 1 and 2 payments. This will support the 10 year strategy for Self-Directed Support which is driven by the Scottish Government and COSLA (The Convention of Scottish Local Authorities).
- 4.4 A “*Self-Directed Support Whole System Improvement*” Kaizen review was carried out in March 2016. The final Kaizen report supported exploring the use of payments cards as an opportunity to improve financial monitoring procedures.
- 4.5 A payment card account is a debit card based account which can be pre-loaded with funds and used to make purchases. As many other Local Authorities have proven, these cards can also be used by the Local Authority to make payment to Direct Payment recipients. The recipient is issued with a card and the Local Authority can make payment(s) to the account as and when required. The recipient can purchase their care and support from the account as they would with their own bank account. This may be done via Standing Order/Direct Debit, online purchases, store purchases using the debit card etc. The recipient also has access to online and telephone banking facilities.
- 4.5.1 Accounts can also be issued to organisations who manage budgets on behalf of the service user such as managed payroll companies (under Option 1) or Independent Service Fund providers (under Option 2). The organisations would be able to purchase care and support

on behalf of the service user as they do at the moment.

- 4.5.2 Some examples showing a comparison of the implications for the service user under current procedures and under a payment card system are noted in Appendix 1.
- 4.5.3 Under a payment card system the AHSCP has ownership of the card accounts and funds held within them.
- 4.5.4 The AHSCP will have live online access to view the account transactions. They will also have the facility to run reports on areas of concern such as high balances, dormant accounts etc. and take appropriate action. This means that the service user will no longer be expected to complete financial monitoring returns.
- 4.5.5 As the AHSCP owns the funds, they will have the authority to recover surplus balances from the accounts if required. This action would only be taken after appropriate consultation with the practitioner and service user, as is normal practice at the moment.
- 4.6 An AHSCP Finance Officer and SDS Strategic Development Officer joined the National Prepaid Card Network in 2016. This is an independent network which was established to allow Local Authorities, Payment Card providers and associated organisations to share information and best practice for mutual benefit.
  - 4.6.1 Research carried out by the network has shown that Local Authorities who have implemented a payment card system for Direct Payments have made savings of approximately 5-10% to their annual Direct Payment budgets. These savings have been achieved from having a more efficient financial monitoring system and timeous recovery of unused funds. The system has also provided practitioners with more meaningful information to support them at service user case reviews, which in turn help prevent budgets being overpaid.
- 4.7 AHSCP Senior Management Team approved a business case for the implementation of a payment card system for Option 1 & 2 recipients in January 2017.
  - 4.7.1 The business case included the employment of a temporary Finance Officer to oversee the project implementation. This post is funded from a budget the Local Authority receives from the Scottish Government to support the implementation of SDS in line with the National 10 year strategy.
  - 4.7.2 Also included in the business case was the employment of a temporary Assistant Finance Officer – also from the SDS funding from the Scottish Government. This member of staff has been employed to support service users in the transition to the new system. This approach has been taken based on learnings from other Local Authorities who have implemented a payment card system.
- 4.8 Education and Children’s Services management have given approval for children’s services to proceed with implementation of the payment card system for Option 1 & 2 payments. Representatives have been involved in the implementation planning and a joint roll out has been agreed.
- 4.9 A payment card working group was established in January 2016. This is a cross service group which has been established to support the implementation of the payment card. Membership includes representatives from Strategic Development, Health & Social Care

Practitioners, Finance, Legal, ICT, Accountancy and procurement. Internal Audit have also been consulted.

- 4.10 The AHSCP Finance Officer has consulted with many other Scottish Local Authorities who have implemented the system. This includes site visits to Council Offices to view their systems in a live setting and meeting the staff operating them. The advice gained from the cross Authority network has been invaluable. The AHSCP Finance Officer will continue to consult with this network both pre and post implementation for advice and to share best practice.
- 4.11 Service user representatives attended a product demonstration provided by payment card providers. Their feedback from viewing the systems was positive.

## **5 Implementation Plan**

- 5.1 A payment card provider will be procured via a mini-competition process.
- 5.2 The AHSCP Finance Officer will continue work with service user representatives when developing procedures to gain feedback on areas which will affect the service user experience.
- 5.3 Following the procurement of the preferred provider, an implementation date will be agreed. This date is expected to be towards the end of 2017. From this date all new service users taking an Option 1 or 2 payment will be provided with a payment card to receive their personal budget payments.
- 5.4 Thereafter, there will be a planned approach to migrate existing service users over to the new system. These service users will be offered a face to face meeting with the Assistant Finance Officer, who will support them to make the changes and ensure they understand how to use the payment card.
- 5.5 A communication Strategy has been developed to ensure that stakeholders are kept informed of developments from an early stage. This will be especially important for service users to ensure they fully understand why we are making the changes, how it will affect them and more importantly how it will benefit them.
- 5.6 Cornerstone SDS Aberdeenshire will also provide advice and support to service users as part of their contract which is currently in place.
- 5.7 Training will be provided to all staff who will be required to carry out financial monitoring under the new payments card system. Once the preferred provider has been selected and the system requirements are confirmed, the new financial monitoring process will be drafted and agreed. This will allow the training plan to be finalised and put in place prior to implementation.

## **6 Equalities, Staffing and Financial Implications**

- 6.1 An equality impact assessment has been carried out as part of the development of the proposals set out above. It is included as Appendix 2 and no impact has been identified.

- 6.1.1 Care has been taken to ensure that the payment card provider can provide facilities suitable for our service user requirements. For example service users who do not wish to use the online banking facility can use telephone banking facilities and will be able to request bank statements if they prefer. It is also important that the card provider's call centre staff are trained to meet the needs of our service users and this will be stipulated in the mini-competition.
- 6.2 Savings to budgets have been identified as a result of the implementation of the payment card system and have been included in the members' savings plan. The savings are estimated to be £200,000 this financial year.
- 6.3 There are no staffing implications identified from the implementation of the project.
- 6.4 The Chief Officer, along with the Chief Finance Officer and the Legal Monitoring Officer within Business Services of the Council have been consulted in the preparation of this report and their comments have been incorporated within the report.

**Mike Ogg**  
**Partnership Manager (Strategy & Business)**  
**Aberdeenshire Health and Social Care Partnership**

Report prepared by Sheryl Donaldson, Finance Officer  
11 July 2017

**APPENDIX 1                      EXAMPLES – IMPACT ON SERVICE USER**

Example 1

Mrs Smith receives an Option 1 payment which she manages herself. She uses the funds to employ a Personal Assistant to provide her with care at home. She also uses the funds to book a creative respite break at a caravan park.

	<b>Current Process</b>	<b>Payment card process</b>
<b>What are the bank account requirements?</b>	Mrs Smith is required to open a bank account for the purpose of receiving Direct Payments and purchasing her care and support. She will be required to provide the bank with official identification and may be subject to a credit check.	There will be no requirement for Mrs Smith to open a bank account. The Local Authority will open a payment card account on behalf of Mrs Smith. It is not anticipated that identification is required, however it is, then a wide range of identification will be acceptable. Mrs Smith will not be subject to a credit check.
<b>How will Mrs Smith receive her payments?</b>	The Local Authority makes payment every 4 weeks to Mrs Smith's bank account.	The Local Authority makes payment every 4 weeks to Mrs Smith's payment card account.
<b>How does Mrs Smith pay her contribution?</b>	Mrs Smith pays her contribution in to her bank account every 4 weeks. This can be done by cash payment, bank transfer, standing order, or direct debit.	Mrs Smith pays her contribution in to her payment card account every 4 weeks. This can be done by bank transfer, standing order, or direct debit. This can also be done by making cash payment at selected retail outlets (via Post Office and/or Paypoint).
<b>How does Mrs Smith pay for her care and support?</b>	Mrs Smith can pay her Personal Assistant from her bank account by either using her online banking faster payments system (same day) or can set up a standing order to make the payments in advance. A telephone banking service may also be available if provided by her bank.	Mrs Smith can pay her Personal Assistant from her payment card account by either using her online banking faster payments system (same day) or can set up a standing order to make the payments in advance. She can also use the payment card telephone banking service to request that the payment be made.
	Mrs Smith can pay for her caravan respite break by using her bank debit card if her bank permits the use of a debit card. Otherwise Mrs Smith would be required to withdraw cash to pay for the break.	Mrs Smith can pay for her caravan respite break by using her payment card debit card.
<b>What financial monitoring will Mrs Smith be required to complete?</b>	Mrs Smith will be required to complete regular financial monitoring returns showing how money has been used. She will also be required to submit copy bank statements.	Mrs Smith will no longer be required to complete and submit financial monitoring and bank statements. Mrs Smith does not need to do anything.

<p><b>If there are is a balance of unused funds in the account how is this recovered?</b></p>	<p>The practitioner will contact Mrs Smith to discuss if it is appropriate for funds to be repaid and if so how much. Mrs Smith will be required to either write a cheque or make a BACS transfer to the Local Authority.</p>	<p>The practitioner will contact Mrs Smith to discuss if it is appropriate for funds to be repaid and if so how much. The Local Authority will reclaim the money direct from the payment card account on an agreed date. There will be no requirement for Mrs Smith to write a cheque or make a BACS transfer.</p>
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Example 2

Mr Smith receives an Option 1 payment. He uses the funds to employ a Personal Assistant to provide him with care at home. Mr Smith uses a managed account service to manage the payroll arrangements.

	<b>Current Process</b>	<b>Payment card process</b>
<b>What are the bank account requirements?</b>	The managed account provider will open a bank account on behalf of Mr Smith. He may be required to provide official identification.	There will be no requirement for the managed account provider to open a bank account. The Local Authority will open a payment card account on behalf of Mr Smith to be operated by the managed account provider. It is not anticipated that identification is required, however it is, then a wide range of identification will be acceptable. Mr Smith will not be subject to a credit check.
<b>How will Mr Smith receive his payments?</b>	The Local Authority makes payment every 4 weeks to the managed account providers' bank account.	The Local Authority makes payment every 4 weeks to the payment card account issued to the managed account provider.
<b>How does Mr Smith pay his contribution?</b>	The Local Authority will invoice Mr Smith for his contribution every 4 weeks.	The Local Authority will invoice Mr Smith for his contribution every 4 weeks.
<b>How does Mr Smith pay for his care and support?</b>	The managed account provider will pay for the care and support on behalf of Mr Smith using the payments received from the Local Authority. Mr Smith does not need to do anything.	The managed account provider will pay for the care and support on behalf of Mr Smith using the payments received from the Local Authority to the payment card account. Mr Smith does not need to do anything.
<b>What financial monitoring will Mr Smith be required to complete?</b>	The managed account provider will complete and submit financial monitoring returns on behalf of Mr Smith detailing how the money is being used. However, if the managed account provider does not submit the financial monitoring in the required timescales, the Local Authority may contact Mr Smith and ask him to pursue this, as he is ultimately responsible for managing the budget.	The managed account provider will no longer be required to complete and submit financial monitoring. Mr Smith does not need to do anything.
<b>If there are is a balance of unused funds in the account how is this recovered?</b>	The practitioner will contact Mr Smith and the managed account provider to discuss if it is appropriate for funds to be repaid and if so how much. The managed account provider will be required to either write a cheque or make a BACS transfer to the Local Authority. Mr Smith does not need to do anything.	The practitioner will contact Mr Smith and the managed account provider to discuss if it is appropriate for funds to be repaid and if so how much. The Local Authority will reclaim the money direct from the payment card account on an agreed date. There will be no requirement for the provider to write a cheque or make a BACS transfer. Mr Smith does not need to do anything.

Example 3

Ms Smith receives an Option 2 payment via an Independent Service Fund (ISF). She uses the funds to purchase care at home via an agency and purchase short creative respite breaks throughout the year.

	<b>Current Process</b>	<b>Payment card process</b>
<b>What are the bank account requirements?</b>	The ISF provider will open a bank account on behalf of Ms Smith. She may be required to provide official identification.	There will be no requirement for the ISF provider to open a bank account. The Local Authority will open a payment card account on behalf of Ms Smith to be operated by the ISF provider. It is not anticipated that identification is required, however it is, then a wide range of identification will be acceptable. Ms Smith will not be subject to a credit check.
<b>How will Ms Smith receive her payments?</b>	The Local Authority makes payment every 4 weeks to the ISF providers' bank account.	The Local Authority makes payment every 4 weeks to the payment card account issued to the ISF provider.
<b>How does Ms Smith pay her contribution?</b>	The Local Authority will invoice Ms Smith for his contribution every 4 weeks.	The Local Authority will invoice Ms Smith for his contribution every 4 weeks.
<b>How does Ms Smith pay for her care and support?</b>	The ISF provider will arrange and pay for the care and support on behalf of Ms Smith using the payments received from the Local Authority. Ms Smith does not need to do anything.	The ISF provider arrange and will pay for the care and support on behalf of Ms Smith using the payments received from the Local Authority to the payment card account. The provider will be able to make payments online, by card and by telephone banking. Ms Smith does not need to do anything.
<b>What financial monitoring will Ms Smith be required to complete?</b>	The ISF provider will complete and submit financial monitoring returns on behalf of Ms Smith detailing how the money is being used. Ms Smith does not need to do anything.	The ISF provider will no longer be required to complete and submit financial monitoring. Ms Smith does not need to do anything.
<b>If there are is a balance of unused funds in the account how is this recovered?</b>	The practitioner will contact Ms Smith and the ISF provider to discuss if it is appropriate for funds to be repaid and if so how much. The ISF provider will be required to either write a cheque or make a BACS transfer to the Local Authority. Ms Smith does not need to do anything.	The practitioner will contact Ms Smith and the ISF provider to discuss if it is appropriate for funds to be repaid and if so how much. The Local Authority will reclaim the money direct from the payment card account on an agreed date. There will be no requirement for the provider to write a cheque or make a BACS transfer. Ms Smith does not need to do anything.



EQUALITY IMPACT ASSESSMENT

Stage 1: Title and aims of the activity (“activity” is an umbrella term covering policies, procedures, guidance and decisions).	
Service	Aberdeenshire Health & Social Care Partnership and Education & Children’s Services
Section	Finance
Title of the activity etc.	Payment Card Project

<p>Aims of the activity</p>	<p>The aim is to implement a payment card system for use with clients receiving an Option 1 or 2 payment under Self Directed Support.</p> <p>Current processes rely on the recipient of the payment (service user, representative or organisation) having to open their own bank account to receive the payments and purchase their care and support. They are also required to complete and submit financial monitoring returns to confirm how they have used the Direct Payment money, as well as copy bank statements and in some cases receipts. Due to the labour intensive nature of the process, the difficulty receiving the financial information, and the ownership of funds once paid to an external bank account, we are not able meet our duty to carry out sufficient financial monitoring and actively recover unused or misused Direct Payment money. This has been highlighted as an audit risk on several occasions. Despite many improvements being made to financial monitoring processes, the risk still stands due to the above unresolved issues. In addition, the above risks result in us being unable to meet CIPFA (Chartered Institute of Public Finance &amp; Accountancy) guidelines in being able to account for how public money is being used.</p> <p>Many other Local Authorities who have faced similar problems have implemented a Payment Card system for Direct Payments. This has proven to have reduced the risks significantly and achieved substantial savings to care management budgets. Under this system, the recipient is issued with a payment card account (debit card), which the local authority makes regular payment to. The recipient can access the account to purchase their care and support as they would with a regular bank account. The recipient and the local authority will have 24 hour online access to the account, which removes the need for the recipient to complete financial monitoring returns. The local authority can run reports to alert to high/low balances, large transactions, and dormant accounts. We have access to this information at the moment, however it is a manual process of searching through bank statements and returns and therefore time consuming. As the local authority own the accounts, they are able to “claw back” funds without having to rely on the service user writing a cheque as they currently do. Again, we actively recover unused funds at the moment, but this will make the process more achievable and timeous. Of course this would only be following appropriate consultation with the recipient of the funds.</p> <p>The system should reduce the time spent by finance staff and practitioners chasing overdue financial monitoring returns from our service users, representatives, and organisations who manage the funds on behalf of our service users. This should improve relationships and allow better quality time between the practitioner and service user.</p> <p>New service users (reps or organisations) will be issued with the cards for the method of receiving Option 1 and 2 payments. There will be a plan to transfer existing service users over to the new system. These service users will be supported by a member of finance staff who will be employed (fixed term) for this purpose.</p>
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Author(s) & Title(s)	Sheryl Donaldson (Finance Officer)
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Stage 2: List the evidence that has been used in this assessment.	
Internal data (customer satisfaction surveys; equality monitoring data; customer complaints).	<ul style="list-style-type: none"> <li>• Internal Audit 1624 – Self Directed Support (Items 2.4.1 – 2.4.6 inclusive)</li> <li>• CareFirst Reports – overdue financial monitoring returns</li> <li>• Kaizen Report – Self Directed Support</li> <li>• In Control Pilot Evaluation report</li> <li>• Information provided by Accountancy team re budget forecasts and repayments made to care management budgets</li> </ul>
Internal consultation with staff and other services affected.	<ul style="list-style-type: none"> <li>• Options Appraisal carried out by the “Payment Card Working Group” (a cross service working group)</li> <li>• Aberdeenshire Cross service workshop to establish the needs and wants of the service, service users and other stakeholders</li> </ul>
External consultation (partner organisations, community groups, and councils).	<ul style="list-style-type: none"> <li>• Research presented by National Pre-Paid Card Network</li> <li>• Research via network of Local Authorities who have implemented a payment card system (which include site visits).</li> <li>• Face to face meetings and discussions with our service user focus group</li> </ul>
External data (census, available statistics).	N/A
Other (general information as appropriate).	N/A

Stage 3: Evidence Gaps.	
Are there any gaps in the information you currently hold?	N/A

Stage 4: Measures to fill the evidence gaps.		
What measures will be taken to fill the information gaps before the activity is implemented? These should be included in the action plan at the back of this form.	Measures:	Timescale:
	N/A	N/A

Stage 5: Are there potential impacts on protected groups? Please complete for each protected group by inserting "yes" in the applicable box/boxes below.				
	Positive	Negative	Neutral	Unknown
Age – Younger	Yes			
Age – Older	Yes			
Disability	Yes			
Race – (includes Gypsy Travellers)			Yes	
Religion or Belief			Yes	
Gender – male/female			Yes	
Pregnancy and maternity			Yes	
Sexual orientation – (includes Lesbian/ Gay/Bisexual)			Yes	
Gender reassignment – (includes Transgender)			Yes	
Marriage and Civil Partnership			Yes	

Stage 6: What are the positive and negative impacts?		
Impacts.	Positive (describe the impact for each of the protected characteristics affected)	Negative (describe the impact for each of the protected characteristics affected)
<p>Please detail the potential positive and/or negative impacts on those with protected characteristics you have highlighted above. Detail the impacts and describe those affected.</p>	<p>Service users will no longer be required to complete paper based financial monitoring returns and submit to the local authority – reduce time and anxiety relating to this task. This is the case for all service users regardless of category.</p>	
	<p>The payment card may make it more possible for Older People or People with Disabilities to receive a Direct Payment if there is less paperwork required and responsibilities</p>	
	<p>Better use of time at the service user and care manager reviews. Not wasted chasing overdue returns – improved relations and the time can be spent focussing on service user’s needs. This applies to all service users regardless of category.</p>	
	<p>Improved financial monitoring means that areas of risk to that individual can be identified by the practitioner in a timely manner, for example financial abuse. This applies to older, younger and people with disabilities who may have someone managing their support on their behalf.</p>	

Stage 7: Have any of the affected groups been consulted?	
If yes, please give details of how this was done and what the results were. If no, how have you ensured that you can make an informed decision about mitigating steps?	The service user focus group has been consulted on an informal basis for feedback. Representatives from the group have attended informal demonstrations by the potential payment card providers and were given the opportunity to ask questions during the event and after. Feedback from the events were positive. The group will continue to be consulted as the project progresses.

Stage 8: What mitigating steps will be taken to remove or reduce negative impacts?		
These should be included in any action plan at the back of this form.	Mitigating Steps	Timescale
	Ensure that the procurement process includes the requirement for the provider to offer alternative methods for making transactions. For example service users with no internet access can use telephone banking service and paper statements can be provided to them.	October 2017

Stage 9: What steps can be taken to promote good relations between various groups?	
These should be included in the action plan.	<ol style="list-style-type: none"> <li>1. Seek feedback from service user focus group on all aspects which may impact on the service user</li> <li>2. Attendance at service user focus group to report progress</li> <li>3. Develop communication strategy to ensure that service users are well informed of the changes and how it may affect them</li> <li>4. Develop leaflet or Frequently Asked Questions insert to be included with communication</li> <li>5. Ensure that practitioners are well informed of the changes and how they may affect their service users to allow them to support them</li> <li>6. Ensure that we offer support to service users to help them make the transition to the new system</li> </ol>

Stage 10: How does the policy/activity create opportunities for advancing equality of opportunity?

By implementing the payment card system, it could remove some barriers that may have prevented individuals from taking a Direct Payment. The nature of the current financial monitoring process may be off putting for older people, or people with a disability. By making the process less beurocratic, it may appear more manageable to these individuals. The purpose of Self Directed Support is to give individuals more flexibility and control over how they receive their care and support. Simplifying our requirements ensures that all who have the ability to manage their own care and support are given the opportunity to do so.

Stage 11: What equality monitoring arrangements will be put in place?

These should be included in any action plan (for example customer satisfaction questionnaires).

Customer satisfaction survey to be carried out 1 year following implementation – this is included in the payment card action plan

Stage 12: What is the outcome of the Assessment?

Please complete the appropriate box/boxes	1	No negative impacts have been identified –please explain.
	There have been no negative impacts identified.	
	2	Negative Impacts have been identified, these can be mitigated - please explain. * Please fill in Stage 13 if this option is chosen.
	N/A	
	3	The activity will have negative impacts which cannot be mitigated fully – please explain. * Please fill in Stage 13 if this option is chosen
	N/A	

\* Stage 13: Set out the justification that the activity can and should go ahead despite the negative impact.

No negative impacts have been identified.

Stage 14: Sign off and authorisation.

Sign off and authorisation.	1) Service and Team	Aberdeenshire Health and Social Care Partnership and Education & Children's Services - Finance	
	2) Title of Policy/Activity	Payment Card Project	
	3) <b>Authors:</b> I/We have completed the equality impact assessment for this policy/activity.	Name: Sheryl Donaldson Position: Finance Officer Date: 15/06/17 Signature:	Name: Position: Date: Signature:
		Name: Position: Date: Signature:	Name: Position: Date: Signature:
	4) Consultation with Service Manager	Name: Kathy Davidson Date: 24/07/17	
	5) Authorisation by Director or Head of Service	Name: Position: Date:	Name: Position: Date:
	6) If the EIA relates to a matter that has to go before a Committee, Committee report author sends the Committee Report and this form, and any supporting assessment documents, to the Officers responsible for monitoring and the Committee Officer of the relevant Committee. e.g. Social Work and Housing Committee.	Date:	
	7) EIA author sends a copy of the finalised form to: eia@abdnshire	Date:	
(Equalities team to complete) Has the completed form been published on the website? YES/NO			Date:

Action Plan						
Action	Start	Complete	Lead Officer	Expected Outcome	Resource Implications	
Attend service user focus group to consult on all aspects which may impact on the service user	Already started	31/12/18	Sheryl Donaldson	Gain feedback from service users group which can be taken in to account when drafting service user communication and processes	Resourced from the temporary Payment Card Finance Officer post.	
Ensure that the procurement process includes the requirement for the provider to offer alternative methods for making transactions. For example service users with no internet access can use telephone banking service and paper statements can be provided to them.	Already started	31/10/17	Sheryl Donaldson	Ensuring that our preferred provider meets the requirements of our service users	Resourced from the temporary Payment Card Finance Officer post.	
Develop communication strategy to ensure that service users are well informed of the changes and how it may affect them	Already started	30/06/17	Sheryl Donaldson	All stakeholders are kept well informed and consulted on the coming changes.	Resourced from the temporary Payment Card Finance Officer post.	

Develop leaflet or Frequently Asked Questions insert to be included with communication	01/08/17	20/08/17	Sheryl Donaldson	Ensuring that our service users fully understand the changes and how it may affect them, reducing anxiety.	Resourced from the temporary Payment Card Finance Officer post.
Develop training programme – to include practitioner training	01/08/17	31/10/17	Sheryl Donaldson	Ensure that practitioners are well informed of the changes and how they may affect their service users to allow them to support them	Resourced from the temporary Payment Card Finance Officer post and temporary Payment card Assistant Finance Officer Post.
Offer 1:1 service user support to help them transition between services	01/08/17	31/07/18	Sheryl Donaldson	Ensure that we offer support to service users to help them make the transition to the new system	Resourced from the temporary Payment Card Assistant Finance Officer Post.