

IMPACT ASSESSMENT

On the impact assessment – We believe it is flawed because the questions asked have not been answered fully.

1. The first question asks how the project or service relates to a wider strategy?

The answer merely explains how charges are calculated... What we would like to know is how do these proposed changes relate to wider strategies such as anti poverty and economic development strategies.

2. Under beneficiaries the impact assessment states that this action has to be taken for financial reasons and will enable KCC to continue providing preventative services.

What it does not say is whether alternative policy options to increasing charges have been considered and why they have been rejected if they have been considered for example reducing numbers of staff (it always amazes us how many people you need to employ to say no), the savings that could be made by not having a charging policy at all.

3. On the question about data and consultation only data has been used.

KCC seem to have decided beforehand that the results of the consultation are of no consequence since KCC have not stated what they will do with the consultation and whether it will be used to review the impact assessment.

4. CiLK would like to point out that under the Health and Social Services and Social Security Adjudication Act which they quote as giving them powers to charge for services also states that charges should be reasonable and have due regard to people's ability to pay.

5. The worked examples in the questionnaire give insufficient information. We can understand why KCC want to keep things simple but we do want more explanation. Officers should not assume that we are all incapable of working things out. We need an explanation of government recommended minimums to make sure KCC are taking the relevant premiums into account.

6. On the disability related expenditure it does seem a little bizarre to suggest that such expenditure is actually going down. How have officers arrived at this conclusion? We need an explanation of how this has been worked out. It really isn't acceptable just to pluck figures from the air. Where is the evidence for what KCC are proposing? We would also like to ask how officers plan to take into account disability related housing costs since disabled people in the rented sector are likely to find that housing benefit will no longer meet all their rent costs.

OTHER OPTIONS

As indicated above, have KCC considered the savings that could be made by not having a charging policy at all?

Review and ensure that care agencies are actually providing value for money.

Top slicing of other budgets.

27th July 2011