



**An independent report on the views of and experiences
with Gloucestershire County Council's Adult Social
Care Charging Policy**

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1- Background information

Evolving Communities is a Community Interest Company (CIC). We specialise in stakeholder engagement and insight to drive improvements in health and social care. Gloucestershire County Council (GCC) commissioned us to carry out a piece of work around the views people have towards GCC's current [adult social care charging policy](#).

In their preliminary research, GCC produced an [issues paper](#) and came up with some initial areas for discussion. We were asked to engage with a) individuals, b) sole-traders, charities, external organisations, and c) GCC employees about these issues.

Initial discussion points included:

- Consideration of the level of the Minimum Income Guarantee (MIG), taking account of how independent living can be promoted if someone is left with only the lowest MIG.
- Consideration to whether it is appropriate to set a maximum percentage of disposable income (over and above the MIG) which may be considered in charges.
- Consideration of whether it is appropriate to set a maximum charge.
- Consideration of the sustainability of a service being provided based on different levels of financial contribution.
- Consideration of the discretion on disregarding such income a person receives as considered appropriate. Consideration of discretion regarding Disability Related Expenses and MIG for individual cases.
- Whether the current policy promotes employment, training, and education to enable people in receipt of social care to achieve disregarded income by being supported into employment. As well as the promotion of wellbeing, social inclusion, and supporting the vision of personalisation, independence, choice, and control.
- Whether the current policy is clear and transparent, and whether its application means that people are not charged more than it is reasonably practicable for them to pay.
- Consideration on how the current policy supports carers to look after their own health and wellbeing and to care effectively and safely.
- If it is felt that the charging rules are being applied equally so those with similar needs or services are treated the same and minimise anomalies between different care settings.
- Consideration of the rights of those who lack capacity or are losing capacity.

The following key areas were identified for GCC to prioritise within the wider review of the charging policy:

- The Minimum Income Guarantee (MIG)
- Disability Related Expenditures (DRE)
- The financial assessment process
- The appeal processes

GCC aim to act on the information we provide them as part of their wider review into the current charging policy.

2-Key findings

The current level of the Minimum Income Guarantee (MIG)

- **Individuals:** in two out of the three focus groups, individuals raised concerns around the current level of the MIG, and said it is not enough to allow a good standard of living.
- **External organisations:** In five out of the 10 focus groups, organisations shared their opinion on the current MIG. All opinions were of negative sentiment and concerned rising living costs and the MIG not taking account of this.
- **GCC staff:** eight comments in the survey concerned the MIG, three of these comments concerns were raised around the impact of the MIG for young people, older people and those on low incomes/not working. Staff mentioned the MIG in four out of the seven focus groups and all opinions had a negative sentiment.

Disability-related expenditures

- **Individuals:** of those who had experienced the DRE process, 82% (14) said they did not find the process clear, fair, and accessible. Individuals expressed negative sentiment in two out the three focus groups.
- **External organisations:** In four out of the ten focus groups, external organisations mentioned DREs. Six groups did not because they hadn't experienced the DRE process. In all four focus groups, the sentiment regarding DREs was negative.
- **GCC staff:** Within the survey, 38% (12) of GCC staff said they have supported an individual in relation to DRE's. All twelve of these staff members said they do not find the process of supporting an individual in relation to their DREs clear, fair, and accessible.

Information related to financial assessments:

- **Individuals:** Individuals rated 'charities or partner organisations' as the most accessible out of the list of resources. No individual in the three focus groups referred to GCC's 'paying for your care' booklet.
- **External organisations:** In seven out of the eight focus groups, external organisations advised GCC's resources aimed at aiding the financial assessment process could be improved.
- **GCC staff:** staff rated 'line managers or peers' and the 'paying for your care booklet' as their most accessible resources.

The charging appeal process:

- **Individuals:** out of the seven individuals that have been involved in an appeal, six advised they did not find GCC's appeal process clear, fair, and accessible.
- **External organisations:** nine out of the 10 focus groups said they haven't supported individuals with an appeals procedure
- **GCC staff:** out of 32 staff, 11 said they have supported an individual with the appeal process. Three said they believe this process is clear, fair, and accessible.

3-What we did

We conducted a variety of focus groups and one-to-one interviews with individuals, GCC staff and sole-traders, charities, and external organisations.

We asked a series of questions to understand people's views on the current policy and how they thought it could improve. GCC also created three surveys (one aimed at each of the three groups) which they promoted through their website and analysed.

This report reflects on both the engagement we carried out, and the survey results provided to us by GCC.

4- Who we spoke to

- We spoke to 23 GCC employees in person and reviewed 32 survey responses from GCC employees.

- We spoke to 11 individuals in person and reviewed 74 survey responses from individuals.
- We spoke to 13 people from 11 external organisations in person and reviewed 5 survey responses from external organisations.

Demographic data was collected through GCC's three surveys* and can be summarised below:

	Individual survey	Sole-Traders, Charities, and External Organisations	Internal employees
Gender	69% female 23% male 5% prefer not to say	60% Female 40% Male	81% Female 13% prefer not to say 3% Male
Gender identity	95% same as sex registered at birth 5% prefer not to say	100% same as sex registered at birth	90% same as sex registered at birth 10% prefer not to say
Age	10% 18 to 44 42% 45 to 64 41% 65 or older	20% 35 to 44 40% 55 to 64 20% 65 to 74 20% 75 or older	23% 25 to 34 7% 35 to 44 23% 45 to 54 33% 55 to 64
Race or ethnicity	82% White: British 7% White: European 7% Prefer not to say	60% White: British 20% Black/British 20% Black: Caribbean 20% prefer not to say	80% White: British 13% prefer not to say
Disability, long-term illness, or health condition	47% Yes 38% No 12% prefer not to say	0% Yes 80% No 20% prefer not to say	23% Yes 65% No 13% prefer not to say
Sexual orientation	76% Heterosexual or straight	80% Heterosexual or straight	77% Heterosexual or straight

	18% prefer not to say 3% Bisexual	20% prefer not to say	17% prefer not to say
Religion	45% Christian 34% no religion 19% prefer not to say	60% no religion 40% Christian	41% no religion 38% Christian 21% prefer not to say

*Demographic data is not available for the in-person interviews and focus groups.

5- What people told us

5.1 The Minimum Income Guarantee (MIG)

5.1.1 Individuals

Within the survey, four individuals expressed negative thoughts about the MIG, either directly or indirectly. Comments include that the MIG does not ensure a basic standard of living, the cost-of-living crisis is making the MIG less effective due to rising costs, people can't do 'normal' things under the current MIG, which is the statutory minimum set out by the Government. This may discriminate against those who are out of work due to their disability.

Individuals highlighted concerns with the GCC's adoption of the Government set MIG, and wanted review of the local authority discretion to allow people to keep more income if they wish.

In two out of the three focus groups, concerns around the current level of the MIG were raised either directly or indirectly.

We were told that the current MIG is not enough to maintain a certain standard of living:

“By [the] time [you’ve] gone through [the] assessment, you then get [a] MIG - around £160 odd a week, [which] goes on utilities, clothes, hygiene, activities. This MIG can be wiped out with one activity a week. What does this person do with the other six days?”

5.1.2 External organisations

Within the survey, no organisations mentioned the MIG.

In five out of the 10 focus groups, representatives from organisations gave an opinion on the MIG. In all five groups, people shared negative opinions on it.

These organisations raised concerns that the current MIG is not enough to pay for someone's basic living costs. Three of these groups made direct reference to the cost-of-living crisis, and that this has made the MIG less effective.

In one focus group, an organisation raised concerns that the MIG discriminates against younger people because they are denied social opportunities that are important for their wellbeing. Another organisation told us that younger and working age disabled people are more adversely affected than others because a) they pay more in contributions over their lifetime and b) if they try to save for things like a house deposit or starting a family the contributions are affected by the amount they have in their savings.

Of relevant context, in two of the groups, organisations said more people are relying on them in the current climate, requesting support with household costs.

Organisations in three of these focus groups said people have to make trade-offs between needs such as heating or eating, food or social care and food or the TV license. Organisations told us this is making people lonely, because they have to sacrifice things like socialising and going to activities.

5.1.3 GCC staff

Within the survey, GCC staff referred to the MIG despite not being prompted by a survey question. This is likely due to the knowledge they have on the care assessment process. GCC staff made eight comments about the MIG, three of these comments insinuated that the current policy adversely affects young people, older people, and those on low incomes/those not working.

We were told the current MIG leaves little money for young people, meaning they are not able to socialise. Another staff member said older people often have greater financial commitments in addition to their care costs, and that there is no money for parents or grandparents to fund Christmas or birthday presents which they describe as 'shocking' and 'indefensible'. We were also told that people who can't work/are on low income are discriminated against because they don't have the opportunity to boost their earnings over and above the current level of MIG.

Staff mentioned the MIG in four out of the seven focus groups. Staff in all four groups shared negative opinions about it. Similar to external organisations and individuals, the general consensus among the GCC staff we spoke to is that there isn't enough money left over for people to live the lives they want to. For instance, one staff member said these people "don't have much money spare for anything extra" and that they can be "very limited with what they can do with their own money".

In one focus group, GCC staff referred to the cost-of-living crisis and said there have been a lot of complaints regarding an increase in both care and household costs while benefits amounts stay the same.

In two of the focus groups, GCC staff said that the current policy and its stance on the MIG adversely affects young people. These staff said that younger people receive a lower MIG than older people. We were told this increases from the age of 25 but it means that those who are younger and can't work (e.g., due to learning difficulties or complex needs) are likely to struggle with their level of income. We were also told that GCC only funds 'social care needs' and not 'nice social care needs' like holidays, and this means that young people really miss out on life experiences.

Recommendation:

From the feedback we received, it is clear that individuals, external organisations and GCC staff feel there is opportunity to review the current MIG, to see if the local authority could allow people to keep more of their income if they wish.

5.2 Disability Related Expenditures (DRE)

5.2.1 Individuals

Individuals were asked in the survey whether they had ever been involved with DREs in relation to financial assessments.

19 people said, 'yes' and 55 said 'no'.

Of the 19 people who said 'yes', 17 people answered the follow-up question 'did you find the Gloucestershire County Council processes and information related to DRE's clear, fair and accessible?'

The majority, (14 people) said they did not.

The greatest concern individuals shared with us is that certain things are not classed as DREs when they believe they should be. Nine comments shared this view.

Examples include:

- **“Limited things [expenses] are taken into consideration when often more is required.”**
- **“They don't consider your extra expenses as a disabled person.”**
- **“Does not account for individual needs and choices.”**
- **“Disgraceful in ignoring disability-related health costs.”**
- **“The bills [to live] are huge compared to other peoples.”**

Individuals shared eight comments around the lack of personalisation offered by the current case-by-case approach to DREs. Example comments include:

- **“Disability-related expenses allowance are arbitrary, without explanation and should be person-centred.”**
- **“The concept of individualisation, [the] local government [are] directed to apply. The council is saying 'how much can we get away with not paying'.”**
- **“The fact she needs these activities for her mental health. It must be factual and accurately represent what my daughter needs to maintain a healthy level of living 365 days a year.”**
- **“Most people have a bath once a week. My daughter has two a day, maintaining skin integrity, her behaviour... washing machine goes on six times a day for bedding, clothing, everything.”**

Individuals shared four comments related to the DRE process being complicated and long. Examples include:

- **“It is so hard to get DRE approved, you need to get the doctor to write or social worker. It should be standard with some conditions that certain expenses are automatic.”**
- **“If you fight you are more likely to have your voice heard. if you're silent you are more likely to be ignored. You have to go through an assault course.”**
- **“A lot of work was required before GCC would consider some DRE's.”**

The fourth most common theme concerns the expense allowance not covering the cost, mentioned in two of the comments. These comments are:

- **“I don’t consider £8 per month clothing allowance acceptable.”**
- **“£5 allowance a week for a cleaner. The average cleaner charges £20 per hour and will only come for a minimum of two hours. £5 a week pays for 15 minutes cleaning, what of use can be achieved in that time and when you can only have the cleaner once every 2 weeks.”**

Individuals in two out of the three focus groups gave their opinions on DREs.

Within one focus group, the topic centred around confusion and frustration that certain expenses are not considered a DRE. This included discussions around transport after a child leaves education, incontinence pads, and that £3 a week towards washing clothes was not enough. People felt that there is a need for an improved conversation about DRE’s at the start of the assessment process.

5.2.2 External organisations

Within the survey, three out of the five external organisations said, ‘yes’ to the question ‘have you ever supported an individual in relation to DRE’s with Gloucestershire County Council?’. Out of those three, two said they did not find the process and information related to DRE’s clear, fair, and accessible.

One organisation provided an additional comment:

“I am not sure what is or isn't on the list. My colleague has recently been supporting a client who has pets. She considers these to be her family and cannot understand why the local authority can't acknowledge the necessity of having them for her mental health.”

In four out of the ten focus groups, external organisations mentioned DREs. Six organisations did not because they said they don’t have experience with DREs or feel they have enough knowledge about DREs to talk about them. In all four focus groups, the sentiment regarding DREs was negative.

In all four groups organisations raised concerns about certain expenses not being considered a DRE. One example is transport costs. We were told while PIP can be used to pay for transport costs, GCC does not consider transport a DRE:

“A lady getting PIP benefit for transport costs. She has a mobility vehicle that takes up all cost of PIP for the car just to sit on the drive. This lady has multiple health appointments for her condition at the hospital and has asked for her petrol to be considered for DRE. However, GCC wouldn’t consider this as they don’t cover transport. They did however consider it when it was challenged!”

Similarly, we were told of an individual who has a mobility vehicle but can’t afford to fuel it. An external organisation said they were told by GCC ‘we don’t consider transport as a DRE’.

External organisations said if transport is accessible to people with disabilities it can allow them to live a more enjoyable, independent life. We were told that currently, the charging policy is not fair because it only helps to address basic needs rather than enrich lives.

We were also told there is a lack of information and communication from GCC about DREs. One organisation said people are often being asked for six months of receipts before they can put in their request but since they didn’t know this beforehand, they don’t have the evidence required to claim their money back/pay less contributions. Another organisation said there is a lack of awareness around DREs, and they believe a lot of people aren’t even aware heating bills can be a DRE.

In one focus group, concerns were raised around GCC’s online calculator. We were told that it doesn’t include DREs, so the calculator produces a figure higher than the individual is likely to pay.

5.2.3 GCC staff

Within the survey, twelve people said they have supported an individual in relation to DRE’s. All twelve of these staff members said they do not find the process of supporting an individual in relation to their DREs clear, fair, and accessible.

Within the comments that followed, the majority centred around concern that the case-by-case DRE process is subjective, and that this means DRE guidance is interpreted differently. There was mention that the guidance on DREs is not an exhaustive list, meaning some expenses are not considered a DRE when they should be. Comments include:

- **“Saying expenses are not essential is minimising and demeaning.”**
- **“[The] FAB team tries to deny DRE claims.”**

- **“Many people with learning disabilities cannot work, cannot read or write, and cannot go out on their own, they need activities to have a decent quality of life.”**
- **“Approval of disability-related expenses seems arbitrary and depends on the assessor.”**
- **“There is no communication explaining why a disability-related expense claim is not allowed.”**
- **“The insurance for an assistance dog was not allowed even though pet insurance is allowed.”**
- **“There is no clarity about what can or cannot be taken into account. It is too subjective and depends on the person.”**
- **“[DRE] guidance is open to interpretation.”**

Within the comments from GCC staff there was also reference to a lack of awareness of DREs from the public. We were told that some people do not know they can ask for DREs. Further, we were told there is a lack of awareness/knowledge within the FAB team as to what extra expenses occur as a consequence of having a learning disability.

Staff within two out of the seven focus groups said they are unsure about DRES/are not familiar with the DRE process. Three out of the remaining five groups expressed negative sentiment about DREs while the other two expressed mixed sentiment.

GCC staff shared that they think there is a lack of personalised assessment of DREs despite it being a case-by-case assessment process. For example, we were told about an individual who has a support dog on DRE, yet the insurance for the dog (£80) is not accepted as a DRE.

Within the focus groups, staff raised concerns on the subjective, and sometimes inconsistent nature of the DRE process. The following was noted as the current process:

“There is a list of DREs. Others can be taken into account on a case-by-case basis.”

Of the two groups that expressed mixed sentiment towards the DRE process, we were told it is difficult to judge peoples’ situations on a case-by-case basis.

Recommendation:

From the feedback we received, there is reason to believe that people with a disability who receive benefits in relation to that disability (which are not determined by GCC) do not always have enough money to cover their all of their additional expenses incurred due to the disability. This may be because their expenses have not been considered as DREs, however this requires further consideration. We can infer there is a lack of understanding among external organisations as to what DREs are and how the process works, and that it is complicated for GCC staff to support individuals in this process.

5.3 The financial assessment process

5.3.1 Individuals

Within the survey, individuals were asked what sources of information they have accessed for support or advice in relation to financial assessments.

Each individual could select more than one answer.

'GCC internal services' e.g., the FAB team and adult social care operations received the highest number of counts (34) followed by 'the GCC website and associated policies' (26), 'charities or partner organisations' (20), GCC's 'paying for your care booklet' (15), 'the Department for Work and Pensions' (11) and 'the Care Advice Line' (8). There were also 20 counts on 'other', which included things like searching on Google and using experience gained from working in health and social care.

Individuals rated 'charities or partner organisations' as the most accessible out of the list of resources. Sixty-eight per cent (13) said these resources are 'easily accessible' and 32% (6) said they are 'somewhat accessible'. 'GCC internal services' and 'GCC website and associated policies' were seen as relatively inaccessible. Twenty-four per cent (8) rated 'GCC internal services' as 'not accessible' and 58% (19) rated it as 'somewhat accessible'. Twenty-four per cent (6) rated 'GCC website and associated policies' as 'not accessible' and 64% (16) rated it as 'somewhat accessible'. When asked whether the listed resources provided the advice and support required, the numbers of people saying 'yes', 'no' and 'unsure' were fairly evenly spread across all resources listed, suggesting different resources are useful for different people.

In two out of the three focus groups, individuals referred to information/communication around the finance assessment/finances. In both these two groups the sentiment was negative. No individual in the three focus groups referred to GCC's 'paying for your care' booklet.

In one of the groups, individuals said that the accessibility of resources around the finance assessment needs to improve to help people from ethnic minority groups. We were told **“there is not enough consideration given to different formats for sharing information... often there is no one on the phone who speaks their language.”** We were also told there is a need to produce guidance in easy read formats and translate words that are **“too professional”** into words that a ‘typical’ member of the public would understand.

In another group, we were told that adult help desk and associated internal departments e.g., finance need to improve the quality of their information and communicate with individuals in a timelier manner. Individuals in this group said they feel their concerns are not being acknowledged by GCC internal services:

“The finance people don’t answer the email.”

“I feel my phone calls to them [the adult help desk] are going down a black hole.”

Individuals also shared their concerns about being priced differently from others in their bills e.g., one person may be priced for one day, another billed for five, which they find confusing. We were told that their social care bill is rarely correct and often arrives a long time after the service has been made, making it difficult to know what to pay. Not only are the bills often incorrect, but we were told by individuals in two groups that if bills aren’t paid on time, they receive **‘a very threatening letter of legal action’**. We were told there is a need for GCC to handle these situations in a softer and more empathetic way.

5.3.2 External organisations

Within the survey, external organisations were asked what sources of information the external organisations use to base their support and advice for finances on. The responses the five organisations gave were fairly evenly spread between ‘Gloucestershire County Council’s website and associated policies’, GCC’s ‘paying for your care’ booklet, ‘charities and partner organisations’, ‘the Care Advice Line’, ‘the Department for Work and Pensions’ and ‘GCC internal services’. Two organisations voted ‘the Care Advice Line’ as ‘easily accessible’, one organisation voted ‘the GCC website and associated policies’ as ‘easily accessible’ and one organisation voted the ‘paying for your care booklet’ as ‘easily accessible’. ‘Charities or partner organisations’ and ‘the Department for Work and Pensions’ received two ratings each, one for ‘easily accessible’ and another for ‘somewhat accessible.’

In seven out of the eight focus groups, external organisations expressed negative opinions towards GCC's resources aimed at aiding the financial assessment process. The remaining two focus groups did not discuss the topic of information for the financial assessment. Six of the eight focus groups did not make reference to or acknowledge GCC's 'paying for your care' booklet. Six out of the eight groups said there needs to be an improvement in the accessibility of finance assessment resources, such as making them available in braille, multiple languages, easy-read and large print and using simpler language. Comments include:

- **“An advocate could speak through it [the paying for your care booklet] but couldn't give it to a person.”**
- **“The information for the finance assessment is clear to people in the know but there is a lot of information that the average person wouldn't understand.”**
- **“The policy as it is and how it's interpreted is not written in layperson's terms.”**
- There is **“a need for more easy reads and visual guides, and more face-to-face conversations.”**

In two of the focus groups, organisations said there needs to be better communication around what people's contributions are likely to be. One organisation told us that an individual thought the more care they received, the greater the contribution they would have to pay. We were told this information needs to be provided to people before, during and after a visit by the FAB team so they have time to properly digest the information.

Five of the eight groups said they rely quite heavily or solely on their own knowledge, experience and resources rather than information produced by GCC. If they do use resources by GCC, they use it in conjunction with their own. Comments include:

- **“I haven't found any GCC resources useful that I have used, we have our own Care Act training with examples to share with people.”**
- **“We tend to use our own website and internal advisers.”**
- **“We use our in-house knowledge. We use local authority website but they are difficult to navigate.”**

One organisation spoke positively about GCC's resources and said they rely heavily on the 'Gloucestershire Care Guide' from the council website to help support those who use their service.

5.3.3 GCC staff

Within the survey, GCC staff were asked what sources of information they have accessed for support or advice in relation to financial assessments. Each individual could select more than one answer. 'GCC internal services' e.g. the FAB team and adult social care operations received the highest number of counts (27) followed by 'line managers or peers' (24), GCC's 'paying for your care booklet' (21), 'GCC's website and associated policies' (19), the 'Care Advice Line' (10), 'the Department for Work and Pensions' (6), 'charities or partner organisations' (5), 'Adults community care information' (5) and 'other' (3).

GCC staff said information from 'line managers or peers' was 'easily accessible' (96%, 22). The majority (67%, 14) voted the 'paying for your care booklet' as 'easily accessible'. 'GCC website and associated policies' were voted as 'somewhat accessible' (74%, 14) and the 'GCC internal services' were split between 'easily accessible' (33%, 9), 'somewhat accessible' (44%, 12) and 'not accessible' (22%, 6).

When asked in the survey 'how far do you feel the resources you have selected support people with preparing for their financial assessment', the majority said that each of all of the resources partially support people. This percentage and number of GCC who voted the resource as 'partially supportive' can be seen below:

- GCC internal services: 85%(23)
- Line managers or peers: 79%(19)
- GCC 'paying for your care booklet': 90%(19)
- GCC website and associated policies: 95%(18)
- The Care Advice Line: 90%(9)
- Department for Work and Pensions: 67%(4)
- Charities or partner organisations: 80%(4)
- Adults Community Care Information: 80%(4)

Ten GCC staff said it's difficult to understand information and the finance process and nine said it's difficult to get information from the FAB team.

While individuals and organisations don't seem to reference the 'pay for your care booklet' much, it is interesting that GCC staff rated the booklet as the most effective source of information for them in the survey.

Within the focus groups for GCC staff, four out of the seven refer to the 'paying for your care booklet'. One out of seven groups express negative sentiment over information and communications provided by GCC, four show mixed sentiment, one positive and one neutral.

In the focus group that expressed negative sentiment, we were told that information produced by GCC is not as accessible as it should be, and that the online financial calculator tool is not very accurate and currently unavailable. Those that expressed mixed sentiment felt positive about the 'paying for your care' booklet and the 'adult help desk' but felt GCC's resources could be more accessible and disseminated at key points more effectively. One member of staff told us that while senior colleagues in commissioning are very knowledgeable, the general public and external organisations don't have access to these people.

We recommend that the 'paying for your care booklet' should be promoted more widely among both individuals and external organisations, as it doesn't seem to be well known among these groups. We also recommend that GCC produce resources in more accessible formats, working alongside external organisations, because currently not enough people are receiving the information, they need in a way that works for them.

5.4 The appeal process

5.4.1 Individuals

Within the survey, seven individuals (10%) said they have been involved in an appeal against a Gloucestershire County Council charging decision, 60 (90%) said they have not. Out of the seven individuals that have been involved in an appeal, six answered a follow-up question and said they did not find the GCC appeals process clear, fair, and accessible. Five of these individuals went on provide further comment. Three of the individuals expressed concern that the process was not explained to them in advance – "It felt like no one was helping me."- and two individuals said they felt the council were being obstructive in the process:

"The local authority has been slow to respond all the way through the appeal process. The LA said they would reimburse me for funds I have had to pay out. This was said on the 19th of January and I still have not been contacted to arrange reimbursement. A delay of seven months is untenable."

Within the focus groups, two out of the three groups didn't mention the appeals process/waivers. One out of the three said they haven't been through the appeal process but plan to if GCC come back and say they won't include certain expenses as a DRE.

5.4.2 External organisations

One out of the five organisations that filled out the survey said they have previously supported an individual appeal a GCC charging decision. This one organisation said they found the processes and information related to appealing a charging decision clear, fair, and accessible.

Organisations within nine out of the 10 focus groups told us they haven't supported individuals with appeals process before. Out of the one that did, they think it is a robust procedure but say that many often give up because they [the organisation] have a waiting list to provide support for people.

This one organisation said they haven't seen information related to waivers in GCC materials, only in national guidance. This organisation told us that their experience is that there is often no talk of a waiver 'unless a threat of legal action is raised'.

We recommend that GCC collaborate with external organisations to help train them about the appeals process and waivers. This should make people feel more supported and reduce the pressure on GCC.

5.4.3 GCC employees

Out of 32 staff who filled out the survey, 11 said they have supported an individual with the appeal process. Three said they believe this process is clear, fair, and accessible. Seven said they don't, and one did not answer

All comments that staff submitted to the online survey relating to the appeals process were negative. These include:

- **“One person had a support dog due to her disabilities. She could prove it was provided to her by a charity and that they insisted on a specific insurance being paid for when she signed the contract to have the support dog, (which was higher than the basic pet insurance). She was told the DRE would only use the basic pet insurance amount so she found the weekly charge a struggle to pay.”**
- **“It took several months of going back to FAB with additional information before the issue was resolved.”**

- **“Made to feel as though the decision was already set in stone prior to appeal.”**
- **“Feels like the FAB team apply the same requirements to each person rather than considering individual circumstances further.”**

Three out of the seven focus groups said they have supported an individual appeal a charging decision directly, while four out of seven groups said that hadn't.

Positive comments mentioned by those in the focus group included:

“The new panel structure is much better, better thinking, rational, it's more robust and consistent.”

“People are quite well informed how to do the appeal. The VO has a section about DREs and [an] individual can appeal but [they] need written evidence and documents to support this.”

Negative comments mentioned by those in the focus group include the lack of a process:

“[I] don't know of any who have gone down formal appeal route. Sometimes the VO hasn't taken their individual circumstances into account.”

“Don't think anyone knows we have this. It's currently being looked into. FAB often don't tell people about looking into this in a re-assessment.”

6- Recommendations

We recommend the following as a result of this engagement:

- 1) Review the current MIG to see if the local authority could allow people to keep more of their income if they wish.
- 2) DREs require further consideration. We can infer there is a lack of understanding among external organisations as to what DREs are and how the process works, and that it is complicated for GCC staff to support individuals in this process.

- 3) Promote the 'paying for your care booklet' more widely among both individuals and external organisations, as it doesn't seem to be well known among these groups. Review resources for accessibility, working alongside external organisations.

- 4) Review the current appeals process, considering the feedback that it is not simple and takes too long. Improve people's awareness of the ability to appeal and waive charging costs.

7- Acknowledgements

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