

Interim Scrutiny Report:

Transforming Our Community Equipment Services and Fair Access to Care Eligibility Criteria for Equipment

1. Executive Summary

The purpose of this scrutiny review is to gain an understanding of the proposed plans to change Cumbria County Council's community equipment services and the introduction of Fair Access to Care eligibility criteria for occupational therapy assessments.

The Scrutiny task and finish group met for a single session in which they met a range of witnesses including officers involved in designing and implementing the proposed schemes, representatives from service users' organisations and the Acting Corporate Director of Adult and Cultural Services.

Members considered the following aspects of the proposals:

- Fair Access to Care and the County's Anti-Poverty Strategy;
- The use of Trusted Assessors to assist in the Self Assessment process;
- The planned consultation on Fair Access to Care;
- The likely effect of the implementation of Fair Access to Care on those with low income;
- The danger of abuse of vulnerable adults;
- How the Retail Model will function including its relation to Fair Access to Care.

Due to time pressures this task and finish group could only meet for a single session as the directorate requested that the results of the review should be made available for the first week in September. However the task and finish group feel that there are some areas of work that need further scrutiny and have requested further time to undertake additional research. They submit this report as an interim report and would like to carry out further scrutiny before submitting a final report to Cabinet for December 2009.

2. Interim Recommendations:

Fair Access to Care

- 2.1 To use Cumbria County Council Consultation Strategy and Toolkit to ensure the public consultation exercise is conducted in an open, transparent and equitable manner.
- 2.2 To map current service users against areas of deprivation and poor health. When Fair Access to Care is implemented, the service users' level of need should be incorporated into this mapping exercise.
- 2.3 To produce a long term / 5 year plan for the training of Trusted Assessors to support the long term effectiveness of this scheme.

Transforming Community Equipment Services

- 2.4 To respond to the concerns relating to the Retail Model– (see page 12, paragraph 7.16).
- 2.5 That the directorate undertakes a mapping exercise which shows the distances that service users will have to travel to their nearest Trusted Assessor and accredited retailer. This should include intelligence on the availability of public transport in each area, thereby ensuring no service user is left disadvantaged by the new service arrangements
- 2.6 The Acting Corporate Director of Adults and Cultural Services to report to Scrutiny on the details of the proposed Hardship Fund including how much will be in it, who will be eligible for it and how long it will be in place.

Further Research:

We recommend that scrutiny is given time to investigate further into the following issues with a view to producing a Final Report by December 2009 which will accompany the consultation report to Cabinet.

- 2.7 The effect of the introduction of eligibility criteria on those with low incomes taking into consideration Cumbria County Council's Anti-Poverty Strategy.
- 2.8 The role of the Hardship Fund.
- 2.9 What can be learned from other local authorities who have already implemented Fair Access to Care especially in the area of managing negative media coverage.

3. Introduction

- 3.1 This interim report is a result of a scrutiny review on the proposed transformation of Cumbria County Council's community equipment services and the proposed introduction of Fair Access to Care eligibility criteria.
- 3.2 This piece of work is being considered by Scrutiny at the request of Cabinet. Cabinet have requested that Scrutiny look at this proposal before they consider it since it is seen as a sensitive issue which has the potential to result in negative press coverage and public dissatisfaction with the authority.
- 3.3 Whilst welcoming the opportunity to consider this important topic, Scrutiny Members feel that the time made available by the ACS directorate has not been sufficient to give the task the thorough examination it merited. However they are sensitive to the fact that a delay in implementing the scheme would result in considerable added cost for the authority. In view of this dilemma, Scrutiny have produced an interim report at this stage which sets out scrutiny's initial findings on the issue which will go to Cabinet on the 13th October 2009.
- 3.4 The task group have requested that they be allowed to investigate further issues during the time period allotted for the consultation and to feed into a final report in January 2010. This final report will go to Cabinet at the same time as the results of the Consultation and would thereby provide Cabinet with an additional body of evidence to consider.

4. Background

- 4.1 This review focuses on two separate but interlinked developments. The first addresses the way that the authority provides community equipment to older adults and adults with physical disabilities. The second addresses the way in which the authority provides Occupational Therapy assessments for this equipment.
- 4.2 The authority is under pressure to change its current arrangements due to demographic changes which have seen an increase in the numbers of older people and subsequent demand on the existing service. Current demand has resulted in significant waiting times for OT assessment particularly for those with lower level needs. Demand is forecast to grow by 30% by 2020.
- 4.3 Transforming our Community Equipment Services will entail the authority downsizing their community equipment service to provide only large specialist items. It has been proposed that in the future low cost items of less than £100 will be provided instead on prescription via a newly developed network of accredited retailers.

- 4.4 Fair Access to Care will entail moving away from OT assessments for all towards a system where the efforts of OTs will be concentrated on those with high level/complex needs. Those with lower levels of need will be offered a self assessment tool, support and signposting to places where they can obtain the support they need.
- 4.5 Scrutiny members, ACS and Health Agencies recognise the increasing financial burden which the authority is faced with particularly in the light of a growing aging population. However, before implementing the new arrangements for the Community Equipment Service and changes to eligibility criteria, Scrutiny members want to be reassured that future service users will not be significantly disadvantaged by the proposals.
- 4.6 Task and Finish members also need to be reassured that the preparations for a full public consultation exercise are sufficiently open and inclusive and is not regarded simply as a 'done deal' and thereby attracting bad press and further public dissatisfaction with the authority.
- 4.7 In the recent Cumbria Place Survey 2008, the level of confidence the general public have in being able to influence the County Council's decision-making process has fallen to 36%. This is well below the national average and the need to improve public perceptions of the local authority is regarded as a key objective for the County Council.
- 4.8 It is therefore crucial that any major consultation exercise (particularly relating to a reconfiguration of service), is seen to be open, transparent and equitable.

5. Methodology:

Witness Interviews – 20th August 2009:

Nick Waterfield -	County Manager Physical Disability – Cumbria County Council
Catherine Morley -	Project /Service Development Manager (TCES) – Cumbria County Council
Mark Tennant -	Development Manager – Cumbria Disability Network
Sally Bloomer -	Business & Retail Development Manager at Age Concern South Lakeland and involved in the Retail Workstream
Gordon Barwick -	Service Manager PDSI West (Retailer Workstream Representative)

Documentation:

Transforming Our Community Equipment Service and Fair Access to Care Eligibility Criteria for Equipment – Draft paper to Cumbria County Council, Cabinet Briefing 7th July 2009,

PACE – OT Service Delivery Review – Adult and Cultural Services DMT 22nd December 2008, Cumbria County Council.

Transforming Community Equipment – Retail Model Project Initiation Document – Cumbria County Council and NHS Cumbria

Cumbria County Council Consultation Strategy 2006

Cumbria County Council Public Consultation Scrutiny Review 2009

Cumbria County Council Anti-Poverty Strategy 2009

Cumbria Place Survey 2008

Findings and Conclusions

6.0 Fair Access to Care

- 6.1 Under the Fair Access to Care scheme, all service users would be assessed for their level of need. Those with high, complex or substantial needs would still be assessed by an Occupational Therapist and would receive their equipment free of charge.
- 6.2 Those with low to moderate needs would no longer automatically get an assessment by an OT. They would be able to assess their own need using an on-line self assessment tool preferably with the help of a Trusted Assessor and signposted to purchase any equipment needed through an accredited retailer.
- 6.3 Trusted Assessors are trained individuals, often from the voluntary sector, who can help people through the self assessment process. Trusted Assessors can direct them to sources of support including retailers that stock the equipment they need to support their independent living.
- 6.4 The Adult and Cultural Services Directorate feel that the current assessment system is unsustainable. Long waiting lists for assessment indicate that the system is over stretched at present and staff feel that they are not able to spend sufficient time with clients with complex needs.
- 6.5 This demand is forecast to increase by at least 30% by 2020 due to demographic growth in the older people's population and changed patterns of service that aim to support people in their own homes. The introduction of FACs will affect approximately 30-40% of cases currently seen.
- 6.6 There are no predicted job losses as a result of the FACs being implemented as the existing staffing level will be needed to keep waiting lists down (the target is 28 days maximum) and for OT staff to have time to thoroughly assess those with complex needs.
- 6.7 The alternative to introducing FACs is that there will have to be an increase in staffing levels to meet the present and future needs. This is not possible within the resources currently available.
- 6.8 The directorate see the introduction of FACs as a way of 'normalising' the equipment needed to support independent living in older people. They would like to move away from a model where this equipment is seen as specialist and towards a situation where it is seen as readily available on the high street. The need to purchase this equipment should be seen as a natural part of aging and not as a specialist intervention.

6.9 Fair Access to Care and the Anti-Poverty Strategy

- 6.10 Scrutiny members were concerned about the effect that the introduction of FACs might have on people with low incomes. Members wanted to know whether there was any correlation between areas with high numbers of people in need of OT equipment and areas with areas of high deprivation.
- 6.11 Members were concerned that the introduction of this scheme did not go against the intentions of the County's Anti-Poverty Strategy.

Adult and Cultural Services Anti-Poverty Strategy

"The County Council has both an obligation and an opportunity to protect the interests of those in greatest need and to champion the cause of those who are most at risk".

Amongst other things the Anti Poverty Strategy aims to:

- Prevent families and individuals getting into poverty in the first place
- Minimise the harm caused by poverty for people living on low incomes

- 6.12 There was concern that the additional expense of having to purchase and pay for delivery and fitting of OT equipment, even when the cost of the equipment is relatively low, might potentially be too much to pay for those on low income.
- 6.13 The scrutiny report 'Debt in Cumbria' identifies that many older people are already being pushed into debt as a result of higher costs of living. Older people and those on low incomes often suffer from financial exclusion and can be forced to borrow from commercial loan organisations with high rates of interest.
- 6.14 The directorate feels that, since many of the people who are identified as having low – moderate level needs are 'new' to the system, they haven't needed help before, they will not have experienced the current system and therefore will not be expecting to get an automatic assessment and free equipment.
- 6.15 One of the advantages of using Trusted Assessors based within organisations that support older adults or those with disabilities is that people are offered other services including benefits checks to ensure they are taking up all the benefits they are entitled to, advice on debt and healthy living.
- 6.16 There are also plans to set up a 'Hardship Fund' which may be managed by Cumbria's Credit Unions and aimed at those without the means to pay for the equipment they need. No details are available yet

about this fund and the directorate only intends it to be a temporary measure.

- 6.17 There is also a plan to encourage third sector (voluntary) organisations to sell or otherwise make available items of second hand equipment through their premises or shops. Surplus stock held by CCC after the scheme is implemented could be donated to those in financial hardship though this is obviously a finite resource.

6.18 Access to Transport

- 6.19 Members are concerned that older adults and those with disabilities in rural areas will be disadvantaged by this new scheme as it will increase the amount of travelling they have to undertake. Under this new scheme, if they are not entitled to an assessment through social services, they will have to undertake one journey to see a Trusted Assessor and another to source the equipment they need.

- 6.20 Eden has been identified as the second most deprived district in the country in terms of 'geographical barriers'. According to the County's Anti -Poverty Strategy this means that local people without access to private transport will find it very difficult to get to important things they need.

- 6.21 There is a concern that lack of access to transport might put people off seeking help altogether. He also thought that if people relied on the self assessment alone, without the advice of the Trusted Assessors (for example if they decided to undertake the self-assessment at home) they may not be able to accurately assess their own needs or correctly identify the support they need.

6.22 Trusted Assessors

- 6.23 It is very important that the assessors receive the right level of training and be able to recognise situations where the service user's requires an assessment by an occupational therapist. At present, those currently trained as Trusted Assessors (who, for example, deal with Direct Payments) tend to err on the side of caution with assessments. However it is important to maintain the quality of service as the scheme is rolled out and assessors potentially get less cautious. It is important to ensure that those with higher or complex needs do not 'fall through the gaps'.

- 6.24 Third sector organisations provide good Trusted Assessors, it may not be advisable to look at members of commercial organisations (such as commercial partners in the Retail Model) becoming Trusted Assessors as there may be a danger that their primary motivation will be commercial gain.

6.25 Using Trusted Assessors for those with low to moderate needs provides a lighter touch than a full OT Assessment. There are also many service users who do not feel comfortable with having contact with social services. Trusted Assessors from the voluntary sector often appear less 'official' and threatening.

6.26 Consultation

6.27 The ACS directorate are going to undertake a three month consultation on transforming community equipment services and Fair Access to Care eligibility criteria for equipment between September and December 2009.

6.28 Previous experience has shown that when changes such as this are implemented by the County Council that involve the implementation of charges where the service was once free can result in negative media coverage and public outcry.

6.29 Scrutiny undertook a public consultation review in January 2009 which includes lessons from the County's public consultation exercises of recent times. This should be of interest to anyone embarking on a consultation exercise within the authority.

6.30 Abuse of Vulnerable Adults

6.31 Members raised concerns during this review that there was a danger, with less direct contact with experts from social services, that instances of abuse of vulnerable adults will not be picked up.

6.32 The directorate feel that Age Concern and other agencies acting as Trusted Assessors have enough experience to police this issue themselves

Conclusions:

Scrutiny members understood the need for the introduction of Fair Access to Care eligibility criteria and supported it in principle, however they feel that more time is needed to explore both the introduction of Fair Access to Care thoroughly and request that they be allowed to explore a number of issue raised by the current scrutiny review in more depth.

Scrutiny recognised that the introduction of FACs was likely to be a controversial issue. Members questioned whether the three month consultation period proposed was long enough.

Members feel strongly that the Cumbria County Council's Consultation Strategy and Toolkit should be used as a basis for the consultation since it was important that there is a consistency of approach and standard across the authority. The directorate should also pay attention

to the findings of the Public Consultation scrutiny review from January 2009.

Scrutiny members wanted to see more information about the spread of service users affected by this change who live in areas of high deprivation. Members felt that there may be a correlation between areas of high deprivation, poor health (and correspondingly high level of people with low level disability) and low income. They were concerned that certain areas of the county could be disadvantaged by the introduction of FACs.

Members would like to be reassured that service users will not be put off seeking help because they do not have access to transport to take them to the locations where they can see Trusted Assessors or to accredited equipment retailers. Members noted that this scheme does require the service user to go through more processes than the previous scheme where service users would be assessed in their own home and the equipment delivered to them.

Members felt that the success of this scheme depended on the quality and availability of Trusted Assessors. They would like to know more about the authority's plans to ensure enough sufficiently trained Trusted Assessors are in place to support this scheme now and in the future.

7 Transforming Our Community Equipment Services

- 7.1 Cumbria County Council currently supplies community equipment to anyone who needs it within the county without an assessment. These pieces of equipment help people to continue to live independently and in comfort in their own homes which would otherwise be difficult or impossible due to disability or the onset of old age.
- 7.2 This equipment can range from simple items to address low level needs such as waterproof mattress covers and grab rails through to equipment to address more complex needs such as hoists.
- 7.3 County Council is following national policy by promoting the normalisation of low level equipment in order to meet future demand. The aim is to encourage individuals to address the impact of low level disability without direct state intervention.
- 7.4 There are currently two community equipment stores in Ulverston and Maryport. The annual cost of running these stores is in the region of £900,000 which includes staffing and the costs of distribution but which doesn't include the cost of the equipment itself.
- 7.5 There will be some job losses for CCC staff as the in-house equipment supplies are scaled down.
- 7.6 Under the proposed new system, larger items will continue to be distributed from these stores while smaller items (i.e. those up to a value of £100) will be given out on prescription.
- 7.7 Service users will be signposted to accredited retailers where they will be able to obtain the equipment with the prescription. Under this system, the accredited retailer will also be able to deliver and fit equipment if required by the prescription. The cost of the fitting will be included in the prescription the cost of which will be fixed by national guidelines. All accredited retailers will be responsible for employing fitters and will also be liable for their conduct.
- 7.8 Individuals obtaining equipment without prescription from accredited retailers will have to make their own arrangements for fitting equipment. Age Concern runs a Handyman Scheme for older adults where volunteers can be brought in to do simple jobs round the house.
- 7.9 The Retail Model**
- 7.10 ACS is currently setting up a network of accredited retailers who will form the Retail Model.

- 7.11 Approximately 30 retailers and third sector organisations have shown a firm interest in becoming part of this scheme to date. Some of the retailers have more than one outlet in the county. Not all the organisations currently stock this type of equipment but are all are keen to expand their range of activities and see potential in this market.
- 7.12 A series of training and information events have been run since September 2008 which cover different aspects of the scheme and will include accreditation requirements. Items prescribed to service users will be priced at a fixed cost set by the National Catalogue of products. Retailers will receive in the region of £1.50 in fees for every item handled.
- 7.13 ACS is designing an accreditation process based on a national model introduced by CEDES for retailers taking part in the scheme. In addition to the criteria set out in the national model, ACS will also set further criteria ensuring reasonable opening hours and accessibility to stores for those with disabilities. There will also be a complaints procedure and a monitoring procedure in place.
- 7.14 All larger items of equipment (i.e. with a value greater than £100) will be supplied, delivered and fitted by CCC as before.
- 7.15 The Retail Model and Fair Access to Care**
- 7.16 There is some concern that the implementation of Fair Access to Care would mean that those with low level needs will not be entitled to get their equipment on prescription. This would lead to fewer prescriptions being issued and less custom for the accredited retailers. The witness was concerned that this might cause the Retail Model to fail as it could cause accredited retailers to pull out of the scheme.
- 7.17 There is are concern that the Retail Model needs to function effectively in order for FACs to work well. Customers who are advised through the self assessment tool and the Trusted Assessors to buy a piece of equipment need to be able to obtain it easily and locally.
- 7.18 The retail work stream has undergone a risk assessment workshop. Over 30 risks were identified. Not all issues have been addressed yet but members of the Retail Workstream are working towards this.

Conclusions:

While Scrutiny has no great concerns about the plans to transform the community equipment services, they recognise that securing 'buy in' from partners in the private and third sector to the Retail Model is essential to its success.

Scrutiny recognises that for Fair Access to Care to be implemented effectively it will be essential that the Retail Model is also working properly enabling service users to access the equipment they need. Scrutiny would like to hear the directorate's response to this concern and to find out if there are any steps that can be taken to mitigate the risk.

Scrutiny feels that more needs to be understood about the distances that people will have to travel as a result of this new scheme and if there is an equality of access across the county.