

pinpoint Cambridgeshire is a Registered Charity, No: 1156920

Good Afternoon Chair, Members and officers.

Thank you for the opportunity to speak on this item (Fairer Contribution Policy).

I am Sarah Conboy and I am the Chief Executive Officer of Pinpoint. We are Cambridgeshire's Parent Carer Voice Forum: we represent parent carers whose children 0-25 years and have additional needs and disabilities. You will note Pinpoint is named in your papers as we helped to publicise your consultation.

We don't usually respond to consultations because we are usually involved with gathering parent carer voices for the County Council on issues relating to young people with special educational needs and disabilities. However, we have had parents coming back to us very concerned about this and felt we should, therefore make a representation. We also took the unusual step of writing to each of you and would thank those who acknowledged receipt of our email.

We believe that the proposed Fairer Contributions Policy will disproportionately impact on young people with additional needs and disabilities in Cambridgeshire and we note that is also the advice of your officers. Our specific interest is those who are aged 18 to 25 years with the most significant needs. The stage of moving from childhood to adulthood is one of the most challenging phases for individuals and their parent carers. If we ensure needs are met at this stage, then there is the potential to ensure that the transition is smooth and provides a strong foundation for adulthood. Those with the greatest needs receive the enhanced payments because they need to buy more services or specialist services. The policy would appear to take this additional financial contribution but not to provide the services it is intended to buy? This would put this group at risk and we would urge you to review this proposal in light of this disproportionate impact.

We do have some concerns about the other policy changes proposed.

We have not commented on the proposed changes to the temporary residential care element as this affects such a tiny proportion of our under 25s but the potentially disproportionate impact is still a concern.

We do ask you to be clear why additional charges for financial administration of bank accounts are needed and whether they are at an appropriate rate. Many of the under 25s may well have family members or carers who can act for them but for those who do not the impact could be significant.

The direct payments is not an issue in principal but we do ask how it sits alongside the County Council's emerging option of paying by pre-paid credit cards to combat the issue that not everyone has, or wants, a bank account.

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We look forward to hearing the debate and understanding more about how to have assessed the responses you have received from us and others and how you will consider those in making your decision.

Thank you.

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Dear Member,

We are taking the unusual step in writing to you as a member of the Adults Committee as we believe that the proposed Fairer Contributions Policy will disproportionately impact on young people with additional needs and disabilities in Cambridgeshire. As your Parent Voice Forum, for parent carers whose children have additional needs and disabilities, we are disappointed that we were not involved in the development of this proposed policy as we may have been able to advise at an earlier stage before you went out to consultation. We think that proposal will disproportionately impact on those with the most significant disabilities.

Our specific interest is those who are aged up to 25 years with the most significant needs. The stage of moving from childhood to adulthood is one of the most challenging phases for individuals and their parent carers. If we ensure needs are met at this stage, then there is the potential to ensure that the transition is smooth and provides a strong foundation for adulthood. Those with the greatest needs receive the enhanced payments because their needs are the greatest and they need to buy more services or specialist services. The policy would appear to take this additional financial contribution but not to provide the services it is intended to buy. This would put this group at risk and we would urge you to review this proposal in light of this disproportionate impact.

Yours Faithfully

Sarah Conboy

Chief Executive
Pinpoint

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Pinpoint's response to the Consultation: Fairer Contributions Policy

We are commenting with specific reference to those who are young adults, or who are soon to transition into adult services, with additional needs and disabilities in Cambridgeshire who could be affected by the proposed policy.

We cannot support this policy for the following reasons:

Consultation process

- We remain concerned that despite efforts to ensure the consultation was wide reaching, those most likely to be affected will be the least able to respond / participate. Some will not have the capacity to comment as individuals; some will not have an advocate or parent who can independently comment for them; some who do have a carer or advocate may have been too daunted by the consultation to participate. **We do not believe the consultation process has truly understood the issues and concerns of those most affected.**
- The consultation questionnaire is not clear – whilst the language is straight forward and there are worked examples, the principles behind it are not transparent enough to ensure full participation. **If we find it hard to understand, then we would suggest that most of those with learning disabilities (which includes many that we represent) will find it impossible to comprehend. Indeed, I suspect most people without those disabilities will not have understood what they are being asked.**
- Individuals are not easily able to contribute and are very concerned about their own circumstances – as they do not understand how it will apply to their personal circumstances – most fear it's a loss of money that they previously used to ensure they can live independently. **We would ask that you check how many individuals have had their personal circumstances checked as we suspect that the take up will be very low – which would indicate that the majority of those who will be affected do not understand the potential impact.**

Proposal 1:

Taking more to making savings

- This policy will improperly impact upon our young people with a severe disability – as noted in the report to the Adults Committee. **We cannot support a policy which specifically has a disproportionate impact on those with the greatest needs.**
- How does contributing more benefit those with a higher level of need? It would appear that they will not get more services, just the same but at a higher cost. This is not what the government policy states: "It's based on how a person's condition

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affects them, not the condition they have. It's designed to be a more sustainable benefit and make sure support continues to reach those who face the greatest challenges to taking part in everyday life." **This proposed policy appears to simply charge more for the same not more for more. We would not be able to support that this is in the interests of those we represent.**

- There is a real concern that those with enhanced needs, and therefore with enhanced payments, will now pay more without it meeting the additional needs for which the payments are paid. In other words, they are paid more to address their needs then it's taken from them without them getting the additional support the money is intended to provide. **This appears to take the enhanced payment away from the recipient without delivering any enhanced services.**
- We note that the advice to the Adults Committee advised that there was the ability to use discretionary powers, but this does not protect those most disproportionately affected. **The only way to ensure this does not disproportionately impact upon those with the greatest needs is not to introduce this policy.**
- There is no provision in the policy for a review as the policy may turn out to be perverse. At the very least, if policy makers are minded to adopt this policy (and we believe they should not) then policy makers should provide assurance that regular checks will be made to ensure the policy delivers as intended, should elected members pursue it. **This is not good policy making as there is no option for review to ensure the policy is not perverse.**
- The consultation implies that back payments could be required. There should be clarity about the start date for this – from the point at which the policy is approved and implemented rather than for previous years, for example. **There must be clarity over when the charges would apply from: this has not been clear during the consultation process.**
- Not all individuals have been transferred to PIP so there would be a differentiation between those impacted by this policy. If members are still intent on adopting this policy, then it should be delayed until all are under the new PiP system. **There is an inherent discrimination until all those who receive benefits are on the same system: any implementation should not take place until PIP is fully introduced, and DLA has ceased.**

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Direct Payments

- Direct payments are not a problem in principle but there is a direct conflict with the proposed new personal payments policy also being introduced by the County Council: **why are these policies not aligned?!**

Bank Account Management

- Payments for bank account management is not a problem in principle but there is no calculation to suggest whether this proposed cost matches the actual staff time required. It also seems that it may well be a relatively high percentage of available weekly income that would be taken to provide this service. We note the impact assessment suggests that it could impact most on those who already struggle to pay. Furthermore, if the majority of payments are set up as direct debits, then the work involved should be minimal on a weekly basis. **We could not support this policy without far more detail about the proportionality of what is proposed.**

We are aware that since this consultation process began the Country Council have agreed to take a 2% Council Precept increase for adult social care. We, therefore, hope that this policy will not now be pursued as we do believe it is in the interests of our young people with additional needs and disabilities in Cambridgeshire.