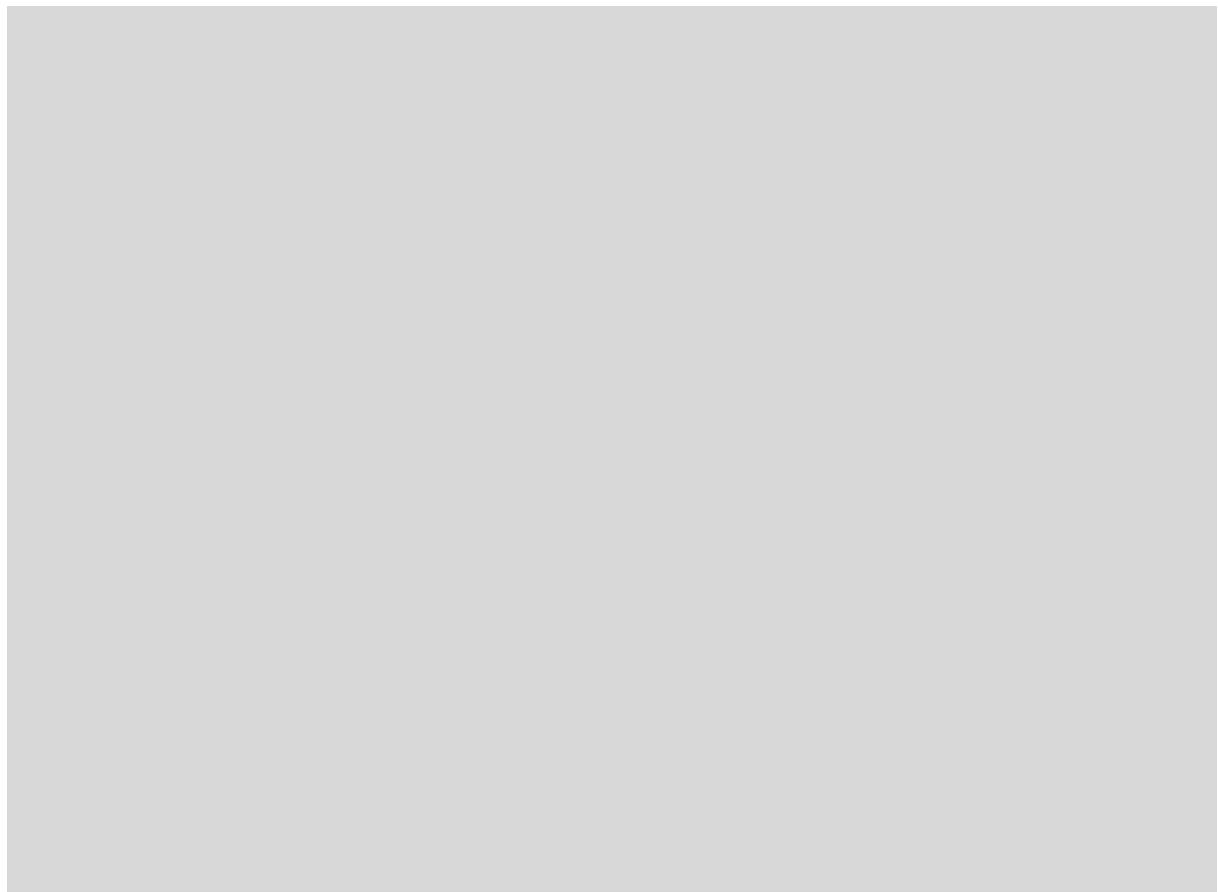


Direct Payment Individual Employer Rate: Consultation Feedback Document



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1. Introduction

1.1 This consultation was established to receive feedback relating to proposed changes to the Direct Payment Individual Employer Rate in North Tyneside. The consultation asked three questions:

- Please provide your views on the impact of the proposals
- What can the council do to minimise any potential negative impact of the proposals?
- Is there anything else you want to say?

2. The Original Proposals and Proposed Implementation

2.1 PA's can either be directly employed by customers or can be self-employed. There are very few self-employed PA's in North Tyneside. However we have put together some different proposals for employed and self-employed PA's which are detailed in the points below. We want to:

3. Employed PA's

3.1 Implement a new gross Direct Payment rate of £8.50 per hour for all customers – this would be the new rate of pay for the PA before any employee tax and NI contributions are made.

3.2 Ensure this new rate will align to the North Tyneside Living Wage (NTLW) in future.¹ The NTLW is currently £8.45 per hour.

3.3 Add the cost of Payroll and Employer Liability Insurance straight into Direct Payment accounts.

3.4 Add costs of agreed expenses, health and safety equipment and annual leave arrangements to Support Plans thereby ensuring these costs are personalised

3.5 Add any additional costs to the Direct Payment account when required and as identified by the Payroll Provider or the council. These costs are for things like additional Employer NI and Pension contributions, statutory sick pay and redundancy payments that may be required.

4. Self Employed PA's

4.1 Implement a new net DP rate of £10 per hour for all customers with self-employed PA's. This different rate is reflective of increased costs experienced by self-employed PA's i.e. pension, holidays, insurance cover etc

4.2 Ensure that this rate increases in line with percentage changes to the North Tyneside Living Wage

¹ The North Tyneside Living Wage is a supplement paid to council staff on certain pay grades based on Living Wage Foundation principles. The living wage foundation uses the 'Minimum Income Standard' as the method of calculating the suggested hourly rates.

5. Proposed Implementation

5.1 Once the consultation is concluded and the required changes have been made we will implement the new Direct Payment Rates for new customers straight away. For existing Direct Payment Customers the new rates will be implemented following the social care review to enable changes to the support plan to be made.

5.2 There will be a safety net for those customers who are employing a PA on a rate above £8.50 per hour currently. The council will continue to pay at the current PA rate whilst that specific PA is employed by the customer. Once that PA ceases to be employed the rate will drop to £8.50 per hour. Cases where PA's are currently being paid over £9.50 per hour will be looked at on a case by case basis at the social care review because the individual employer may not be able to fully meet their employer responsibilities to their PA.

6. Methodology

6.1 The consultation was live from 6th February 2018 until 23rd March 2018.

6.2 Customer and carer groups in the borough received a presentation on the consultation and every Direct Payment recipient received a letter explaining the changes that were proposed and seeking their feedback. In addition to this each Direct Payment Support Provider and Payroll company on the council approved list received a letter about the proposals and their feedback was sought.

6.3 Postal and email feedback was received and many people made contact for further clarification of the issues and with questions. It is acknowledged that the detail of the Direct Payment process and the impact of employment law made this a difficult consultation to communicate to customers. An easy read document was commissioned from Skills for People to support customers to engage with the process.

6.4 This document seeks to answer the questions raised by respondents and bring further clarification. It also details the amended proposals in light of the feedback received.

6.5 Responses were received from customers and groups some of whom were in favour of the proposals and some against. Some of the feedback received can be viewed in the appendices at the end of this document and has been redacted to preserve customer confidentiality.

7. What people liked in the proposals

7.1 Some people generally liked the attempt to simplify the Direct Payment process from a customer and a council perspective. Aspects are described as 'fair' and 'reasonable'. People provided positive comments on the proposals to implement a self employed PA rate. Others liked the idea of linking the PA rates to Living Wage rates via the North Tyneside Living Wage.

7.2 Although not many people specifically commented on the proposal to have a single rate for children and adults PA's, no-one has taken issue with it. Another

person who has experienced significant levels of PA maternity and sickness said that the new approach would take away much of the stress of managing the budget and could see how the proposals could improve their experience of employing PA's.

8. Questions and Concerns Raised

8.1 Throughout the consultation process a number of people raised questions and / or concerns around particular themes. These themes are listed below along with the council response:

8.2 Concern about rising costs and whether the Indicative Budget can meet these costs: We are not proposing any changes to the way indicative budgets are calculated. The process of Support Planning will continue to be the place where a person's final personal budget is agreed. Where the budget in the Support Plans is more than 10% above the Indicative Budget then these cases will continue be agreed via the Resource Allocation (RAS) Panel process.

8.3 Concern about reducing budgets and reducing services: No reductions in service should be experienced by any recipients. Agreed budgets should only be smaller due to the fact the council is, in the proposals, effectively underwriting the costs of statutory sick pay, statutory maternity pay, redundancy entitlements, pension contributions etc.

8.4 Who will calculate Support Plan costs? In the proposals the Support Plan costs and expenses will be calculated by the worker undertaking the assessment and plan. Costs and expenses on plans will be personalised to the individual in receipt of the support rather than the 'one size fits all' approach used in the current system. This will be agreed with the person as the worker develops the Support Plan.

8.5 How will the proposals affect agency rates? Agency rates are outside the scope of this consultation and its' proposals. If you use an agency to meet your social care needs then you should be receiving the commissioned agency rate in your Direct Payment account.

8.6 Pension costs where are they coming from? Employer pension contributions will be added to your Direct Payment account on a regular basis as informed by your payroll provider. We have not automatically built this into the hourly rate because not all PA's opt to have a private pension.

8.7 How much will be added for expenses, annual leave etc? See response to 8.4 above. The approach will be personalised rather than 'one size fits all'.

8.8 A number of people were concerned about the impact of the proposals on their current PA who is currently paid over £8.50 per hour. The council has agreed a safety net for those PA's paid above £8.50 per hour currently. This safety net will extend for as long as your current PA is employed with you. However if anyone is receiving the £10.54 rate currently and they are paying their PA over £9.50 per hour then the safety net may not extend to these cases. This is because you are

unlikely to be able to meet your existing employer responsibilities toward your PA at this rate of pay. However this would be discussed at your annual review.

8.9 How will support for people with fluctuating conditions be managed? It is recognised that some people have conditions which fluctuate and mean the levels of support they require can vary. This is by nature very difficult to predict and requires some level of contingency to be given to allow for these fluctuations. Some people are managing this through using their Direct Payment buffers to deal with fluctuations in their condition. Removing the buffers means they will be unable to deal with fluctuations in this way. However for people whose conditions fluctuate the support plan can be used to create a contingency amount up front and can be used to deal with these fluctuations.

8.10 "Additional costs will be added to the DP account as required". What does this mean? Who will approve these additional costs? The additional costs cover the costs of statutory sick pay, statutory maternity pay, redundancy entitlements, pension contributions etc. They will be approved by the service manager for the relevant social care team.

8.11 The proposals are not legal: The proposals in their current form were shared and discussed thoroughly with members of the council legal team. The amended proposals following this consultation will again be shared with the legal team and the lead councillors for Adult Social Care and Children's Social Care.

9. Amended Proposals: Issue and Council Response

9.1 One employed PA rate does not reflect the range of complexity of need a PA may be working with. A number of respondents considered that the proposals did not adequately account for the varying complexity in different peoples care. Direct Payments can be paid to cover a broad range of assessed needs and PA's can be supporting people who have complex needs and challenging behaviour. The assumption is that where a PA has a choice of potential employers they are more likely to choose the person with less complex needs, therefore making it harder for people with more complex needs to recruit PA's.

9.2 We are proposing to keep the single rate of pay previously outlined. However we recognise that as people's needs differ there may need to be a degree of flexibility in the Direct Payment rate. Therefore the RAS Panel (previously mentioned) will be empowered to make decisions about different rates of pay on a case by case basis, where evidence is provided that a different rate is required.

9.3 How to retain PA's when only a small number of hours support are required. A couple of respondents felt that £8.50 was a low rate of pay when the employer is not able to provide many hours work. For example it may be that a couple of hours support is required twice per week or maybe a couple of hours at the weekend. The PA is going to have to have other forms of employment which could easily conflict with the hours that are required.

9.4 We are proposing to keep the single rate of pay previously outlined. However we recognise that some people may struggle to recruit PA's where few hours of support are required. Therefore the RAS Panel will be empowered to make decisions about different rates of pay on a case by case basis, where evidence is provided that a different rate is required.

9.5 Some respondents have identified that the proposals as submitted would represent a loss of flexibility and would impact their ability to respond to situations as they arise. (This is not to be confused with people who have fluctuating conditions which is dealt with in point 8.9 above) This is a real risk within the current proposals and has not been adequately factored into them. One of the key elements of Direct Payments is the flexibility they bring in terms of being able to respond to unforeseen factors or situations. People need to be given sufficient autonomy to make decisions about appropriate contingencies without reference to council staff. A number of people have advised they would move away from Direct Payments if this flexibility was lost.

9.6 The council recognise that there is a potential loss of flexibility for recipients in the original proposals. We will amend the proposals to include the provision of a contingency level of funding, to be agreed with the worker who is completing the plan. This contingency needs to be agreed at a realistic level and should cover a calendar year. Where the contingency has been used and further contingency amounts are required a social care review will be triggered.

9.7 Concern was raised about the current Direct Payment team becoming increasingly stretched by the proposals.

9.8 The Direct Payment team will under these proposals be required to put through more adjusted payments and will, in all probability, have more requests for advice from customers and workers alike. The impact of the proposals will be kept under review and the impact on existing teams and resources monitored.

9.9 Concern was raised about how to deal with fluctuating holiday allocation due to varying PA hours. PA hours vary for lots of different reasons i.e. sickness of client, changes to client routine, changes to activities, PA's leaving, PA availability etc.

9.10 The support plan will contain a calculation for the number of PA hours needed per week. This figure would then be used to calculate the number of hours / days leave the total package would require. Decisions will have been made with the customer as to how they would want holiday to be covered i.e. using an agency, finding holiday cover from other PA's in the staff team or some other arrangement. The cost of this would then be added to the support plan and subsequently added to the Direct Payment account. Where it is identified that the current allocation of holiday is wrong and there is insufficient in the account to cover this, a review may be required or an agreement made to add money to the account to cover additional leave required.

9.11 Advice and Information related to Direct Payments. Many respondents have raised issues relating to a general lack of information surrounding Direct Payments. People have suggested it would be helpful to have regular updates about issues such as the North Tyneside Living Wage, Agency Rates and Payroll etc. People also feel that there is a general lack of support around the whole process of managing Direct Payments.

9.12 A range of factsheets about Adult Social Care can be found on the My Care website and can be accessed at:

<https://mycare.northtyneside.gov.uk/web/portal/pages/home>

This includes a number of factsheets about Direct Payments, their use and the Direct Payment Support Providers we use.

We will review our Direct Payment support provision to ensure it is adequate to meet the demands of the proposed changes.

9.13 Many respondents raised the issue of how administrative costs should be dealt with. Administrative costs cover a range of elements such as stationary; administrative time, management costs and computer hardware etc.

9.14 Administrative costs are seen as legitimate expenses and should be recorded on the support plan as such. This could lead to the final budget becoming inflated and may then need to be considered by RAS panel. A factsheet for reasonable expenses will be developed and will be circulated to staff and placed with the other factsheets on the My Care webpages.

9.15 Another respondent raised the issue of paying retainers for staff. This is particularly an issue where a person has respite as part of their support plan but could also apply where a person is going on holiday without their PA.

9.16 If the individual employer has specified times when the PA's annual leave has to take place in the employment contract (i.e. during employer respite or holidays) or the PA agrees to take annual leave whilst the individual employer is away, then the employee will receive their holiday pay at this time. However if no such agreement is in place then the employee will be entitled to their full pay whilst the employer is away and will still be entitled to take their own paid annual leave at a time of the PA's choosing. The Support Plan will contain sufficient funds to enable the individual employer to cover PA pay during periods of respite or employer holidays.

Appendix 1

These appendices have been grouped by theme. Not all respondents' views are listed here but each theme that was raised in the consultation has been listed. A separate document is available upon request which lists all feedback received.

Please provide your views on the impact of the proposals:

Theme	Feedback	Ref. No.
Sufficiency	“Because of my son’s specific medical and language needs – we pay £12 per hour – any less and we wouldn’t be able to get anyone – this is still low pay for level of need.”- redacted for confidentiality purposes	DPR5
	“I think increasing the wage in line with the living wage is great. I also think standardising the hourly rate for PA’s is a good idea. I do not think I can afford to pay the increased wage in addition to other costs. If I am able to it will be to just have enough.”	DPR7
Customer Complexity	The pay rates set for PA’s for adults do not acknowledge the complex needs of our daughter (needs specified but removed for confidentiality purposes). The current scheme accepts higher pay rates for PA’s for children. Acknowledging complex needs should set the pay scale for such adults at £9.00 per hour	DPR9
More complex to manage	“From the information I feel that this will be more complicated for me and instead of money coming in once per week and me having control over this it appears that this is now going to be more complicated. This is not going to make it any easier when completing audits.”	DPR18
	<p>“In my opinion the current system is a more cost effective way of administering the DP then complicating it and having more layers of administration processes and more involvement from my social worker, direct payments and payroll. I certainly do not think that this will make it more attractive in fact for me I do not think I would continue with this. I receive £10.54 per hour and this covers all my payroll, wages and expenses and holiday entitlement with minimal contact and administration and still pay the North Tyneside living wage The proposal that has been put forward will mean £2.14 per hour saving but the administration bill to the Local Authority will far exceed this. If I move from direct payment to a commissioned based system this will cost £14.00 therefore a much larger cost to the authority.</p> <p>I have always be extremely proud and happy with the way my life was transformed when I got my direct payment and it has worked really well for me. This has allowed me to continue to work and has given me the freedom to take</p>	DPR18

Theme	Feedback	Ref. No.
	part in everyday things that other just take for granted. I really think this will not be the case if the proposals go ahead.”	
	“Separating costs in the Support Plan makes them more complex and more difficult to manage.”	DPR10
Contingency	Removing all contingency funding would reduce flexibility and result in increased work for under pressure social workers who would need to be involved in minor changes in day to day working arrangements. The current system of monitoring via the prepaid financial services is adequate to ensure accountability. We would not like to rely on our payroll provider to identify additional costs as they have proved exceptionally inefficient in managing such changes as the introduction of personal pensions.	DPR9
PA Rate	Concern was expressed about the £8.50 rate when people only require a PA for a low number of hours – it is not very attractive.	GPMHSU FORUM
	“Thank you for asking for feedback regarding individual employment rates using direct payments. My son as I explained in our telephone conversation yesterday morning has very complex needs as set out in his care plan. When I took over managing his service I employed some members of his existing staff as PA'S. This was to give him continuity of care as his staff team had been with him for many years and were extremely unhappy with the previous care provider and I felt there was a grave possibility they would be forced to leave if I hadn't stepped in. The staff transferred to be PA's while retaining their same rate of pay, the senior carer gets £10.34 working 40 hours and the others earn £8.89 working 36 hours each. They all earn £7.50 per hour during the night at present and cover one another sickness and holiday breaks as my son cannot be cared for by others because of his needs. With this in mind it is imperative that the staff team are retained so my son feels safe and secure with a team of people who know him well.	DPR13
	“I think it would be useful for the NTC to give guidelines on an acceptable range to pay a PA but this should not be set in stone. Some individuals are more difficult to support, and a higher salary is required to attract and keep PA's in post as long as possible.”	DPR10
Living Wage	“The idea of making sure all PA's get a decent living wage is encouraging to avoid difficulty recruiting them or keeping them on the job.”	DPR17
Holidays	“My daughter receives an Individual Budget and within that we employ PAs. But these hours are not set in stone and vary for lots of reasons ie sickness of client, changes to client routine, changes to activities, PA's leaving, PA	DPR10

Theme	Feedback	Ref. No.
	<p>availability etc</p> <p>It is the law to pay holiday and NI contributions, so this amount has to be included in an individual's budget and it makes more sense to add it on the hourly rate.</p> <p>Annual leave is a legal requirement and has to be included in the terms and conditions of the PA's contract and in it will be more work to calculate this and put in the support plan as PA hours are not necessarily set in stone therefore holiday allocation changes."</p>	
Retainers	<p>I feel strongly that in order to recruit and retain staff you have to be able to offer a reasonable wage and to be able to pay them retainer wages when my husband goes into respite. But North Tyneside do not pay for this and I have always been deducted 4 weeks a year which is paid as an average over 52 weeks. I have had to fund this out of any contingency accrued because you cannot expect them to not be paid when X is away unless they use their annual leave, which most kindly do if they can. At our last review I was told that I would get 4 weeks of PA's hours for his morning and evening care i.e. 2 hrs x two PA's per day would be included for the respite weeks but not for his social or my relief time, some 10 hrs per week. Which is progress, but still falls short of me paying them a full weeks wage?</p>	DPR12
On costs	<p>I have had challenging times over the years with (a number of) maternity leaves. The main problem with maternity leave is HMRC who will not refund this benefit for two months after the start and then only two monthly there on. This means I have to fund this benefit and (with sickness and annual leave) this has resulted in me having to pay out over 500 pounds on average a month for four months without any carer support for my husband. Consequently I have had to cover this or employ an agency and having nothing left for to be able to afford to pay someone to give me relief time. I am abundantly conscious of the fact that I employ people and they need to be paid on time and that I have enough monies to do this.</p> <p>If anything comes out of this review then at least I know more now and the proposals for the add on costs will be on an individual basis can only be for the good. Also that I will be able to claim any costs of benefits and redundancy then I can see that this will be much better for me at least.</p>	DPR12
	<p>At this time can I also bring to your attention that there are other funding issues which haven't been covered by direct payments? No funding is made available for in house management costs e.g. provision of a computer and internet provider required for training and the smooth</p>	DPR13

Theme	Feedback	Ref. No.
	<p>running of the service and stationary and printing costs. My son has people working a rota system in his home, requiring furniture, bedding, towels and washing facilities to be provided, who is expected to fund these items? Pensions have recently been introduced but the funding to pay for pensions has again not been made available.</p>	
	<p>“It is difficult to respond in detail as there is insufficient information given both in the presentation and at the Care Forum. We accepted Direct Payments because they allowed us flexibility in how our son receives support (always ensuring this is in line with his Support Plan). The system proposed is much more prescriptive with the Council "taking back" more control. The impact would also depend on:</p> <ul style="list-style-type: none"> • When and how the new net DP rate is to be implemented • How the annual costs are to be assessed and by whom • There is no mention of PA pensions! • How much will be added for expenses, annual leave costs, equipment? • It was mentioned at the Care Forum that there would be a safety net for PA's paid above £8.50 an hour. Surely further information needs to be given about this in any consultation. • "Additional costs will be added to the DP account as required". What does this mean? 	GPCF2
Information	<p>Information about Direct Payment providers and recruitment costs is not great. We need to be more proactive about things which are in the pipeline e.g. pensions</p>	GPPC FORUM
Legality	<p>“The proposals are ill-thought through and in breach of employment and equality legislation and community care guidance. The reduction would be a de-facto cut in community care packages without a concomitant reduction in need, and therefore in breach of community care legal precedents and guidance. You do not make it clear that you are reducing the on-costs from 40% to 24%, again a severe cut. You state you will not be cutting agency and your own staff rates, therefore discriminating against direct payment users under the Equality Act 2010 and community care direct payment legislation. Your proposed staged implementation has a significant risk of putting different staff with the same responsibilities on different pay, in breach of employment law.”</p>	DPR14
Flexibility	<p>“My daughter has been supported to live independently</p>	GPCF1

Theme	Feedback	Ref. No.
	<p>with 24 hour support for the last 7 years and I have received a direct payment throughout this time.</p> <p>For the first 4 years I commissioned different providers specialising in supporting people with sensory loss. The cost of providers was approx £15-£16 per hour due to the skill set required. The LA was, quite understandably, looking to reduce this cost and rather than go through the stress of repeatedly looking to see what could be done differently I proposed that I give notice to the provider and directly employ staff myself at a much reduced rate of £12.50 which was agreed.</p> <p>I directly employ 7 staff, 4 on contract and 3 as bank workers to cover sickness etc. The nature of the package is such that 1 person is employed as a senior to organise rota's and deal with day to day issues. I manage the service at no cost to the authority which I am happy to do however it entails contact several times per week to discuss issues, supervision of the senior (who supervises the support staff), formal team meetings and all household tasks (bills, repairs etc). I require an interpreter for meetings as 4 of the staff are themselves profoundly deaf although I use free venues to minimise costs.</p> <p>Since becoming an employer I have managed the change in the overnight rate, introduction of pensions, staff maternity & sickness, all without any additional input, financially or otherwise from the LA.</p> <p>I am very happy with the current care package which meets my daughters needs well. She has regular reviews by her social work team and all decisions made by myself in capacity of court of protection deputy for property, financial affairs, health & welfare are subject to an annual report to the court.</p> <p>I hope this gives an overview of my daughters situation and my own position which may be slightly unusual.</p> <p>Having seen the proposals for the changes to direct payments I am concerned that the flexibility to carry out all of the functions outlined above will be compromised. I do however fully understand the rationale behind them, in particular the unnecessary administration required to recoup unspent payments.</p> <p>Should the proposals go ahead are you able to give any confirmation that some situations, including my daughters</p>	

Theme	Feedback	Ref. No.
	will be able to continue without amendment as they are complex and quite honestly are working well for all concerned.” – response changed to preserve confidentiality	
	“Like many disabled people my condition fluctuates so much that what I can do changes regularly. As I have control of my budget this allows me the flexibility to be able to change what I do include increasing my PA’s hours or reducing it if I am unwell and not going out. This will either not be possible or be made more difficult for me if the proposals go ahead. I do not want to be having to constantly be running things past my social worker every time I am going to incur expenses. I cannot plan what I need to do a year in advance or sometimes I do not even know what I want to do so cannot always plan for my PA’s expenses. The system I now have is my budget and I know that I have to stick within my budget and often do not spend all of this.	DPR18
Loss of control	“I do feel that I will lose much control over my budget. This will mean that I will have to have more contact with my Social Worker and this will impact on that persons time as every little change will need to be reported to allow the change to be made in my plan.”	DPR18
Simplicity	“Excellent proposals – totally agree with increase in price and reduction in contingency payments direct to employer. Much simpler for employers and auditors”	GPCHCF 1
Positive response	“Proposals if well marketed should go a long way to improve the take up of Direct Payments. Introduce the proposals as a ‘fresh start’ and try to package as many things such as use of payroll companies and prepaid financial services together to aid promotion of positives.”	GPCHCF 2
	“The self-employed PA rate of £10 per hour is good. This reflects the specialised nature of the work, which means they can feel they are not being taken for granted by NTC. We have taken over from adult services in providing this much needed care. Some of us gave up well-paid jobs to ensure care was available.”	DPR2
Monitoring and impact on Direct Payment team	“In my opinion a more robust and effective monitoring of the direct payment scheme is required to make it easier for service users and direct payment staff to process. It is my finding that this team are not able to efficiently check my audits and this has been getting worse as the years have passed due to their workloads. The way my direct payment is working I rarely need to contact direct payments except to chase up my submitted audits and I do not need to be in regular contact with my social worker and have to keep requesting my plan to be changed or updated.”	DPR18

Appendix 2

What can the council do to minimise any potential negative impact of the proposals?

Theme	Feedback	Ref. No.
Sufficiency	“Can’t see why there should be any negative impact apart from the increase won’t be enough!”	GPCHCF1
	“As long as PA’s do not lose pay then the proposals will be a positive change. If they result in PA’s losing income then you may find they’ll have to look for better paid work. Things work well as they are, so hopefully this isn’t change for the sake of it.”	DPR2
	“I think the rates are too low! PA’s for us (range of nursing tasks) – no wonder people struggle to get a PA and they don’t last. Money needs to match the service which is required and expected. We expect a professional service and pay a ‘crappy’ wage – PA’s are saving money on day care, nursing care etc – low wages seem PA’s are undervalued. In turn this has a knock on effect, low morale, not enough money to live on, earning less than a shop worker or cleaner but doing a skilful and most needed job! Why are adults PA’s paid less than childrens? Often adults have more needs, PA will need more training and the role will be more challenging - it’s a big let down to a vulnerable group in society, who rely on others to have a decent quality of life and their daily living needs met.”	DPR5
Complexity	“Keep everything as simple as possible. Avoid using jargon and do not focus on being an employer.”	GPCHCF2
	“Add an extra pay rate of £9.00 for adults with complex care needs. Automatically make uplifts for appropriate annual pay rises, tax and N.I. changes and employer pension contributions.”	DPR9
	“Just do things simply. One payment system, I am so confused I have an Individual Budget – council sorts. But I have payments I make to council; also to Care Call and then also to cover my carers meals! Travel Costs! Cups of tea.”	DPR15
Legality	“The proposals should NOT be implemented as they will breach direct payments users legal rights.”	DPR14
	<ul style="list-style-type: none"> • “In my opinion these proposals do not make sense and should not be implemented. • I am also not convinced that the proposals are legal. • I do not believe the aims and objectives.” 	DPR10
Exceptions Process	“Nothing is black and white. Exceptions need to be reviewed individually as situations arise. It must be ensured that employers do pay the agreed salary to all of their employees.”	DPR8

Theme	Feedback	Ref. No.
Risks of higher council administration	“The Council does not appear to have the resources to review Direct Payments currently-Reviews are infrequent, Financial Assessments are infrequent, no-one is available to check bank statements/invoices when they are sent in-and this is when the onus is on the DP recipient to administer. I fear that the added burden on the Council to administer this system will result in more delays and frustration for DP recipients.”	GPCF2
Holidays Arrangements	“To make sure that holidays, teacher training days, mid-term breaks and summer holiday periods are considered in the budget as some of the services increase their costs which could result to deficit in the budget.”	DPR17

Appendix 3

Is there anything else you want to say?

Theme	Feedback	Ref. No.
Sufficiency	“To make provision for more available services and support to affected families and those currently working to ease pressure of caring for their young adults with special needs / disability. As there have been a lot of cuts due to austerity measures, many families are really struggling to cope with the aftermath.”	DPR17
	“If people can earn more money on a supermarket checkout with very little responsibility it is going to become increasingly difficult to employ <u>decent</u> support staff either employed or self-employed.”	DPR8
Process	“As usual North Tyneside will do what they want and will interpret the law as they see fit not how it was intended”	GPPC SNAP
	“The consultation does not mention any of the disadvantages to direct payment users which gives an unbalanced view in presenting the consultation. The consultation states you will implement the new rates, regardless of any consultation outcome, which is unfair.”	DPR14
Recruitment and Retention	<p>“These proposals will cause more work for NTC and carers and I totally disagree with them. The reason that the full amount of money does not get used is it is difficult to find and keep good PA’s, you end up with a high turnover of staff and periods where you have no support at all.</p> <p>If NTC seriously want to help carers and managers of Direct Payments they should put resources into good quality information, support and a good bank of PAs, training and support for carers.</p> <p>I think it is fair and reasonable to recoup any un-used budget at the end of the year but not to reduce the amount paid per hour of PA time up front.</p> <p>NTC should do a survey to find out what difficulties carers experience in managing Direct Payments – this would give a truer picture of how they could be better utilized and attract more people to use them.”</p>	DPR10
Information	<p>Make more use on the online presence / social media.</p> <p>Develop a SNAP survey for people to complete.</p> <p>Need to give consideration to levels of information</p>	GPPC FORUM
Charging	“One payment direct to council who then pay all the other people on my behalf.”	DPR15
Living Wage	“Great £8.50 living wage and if you get the budget for your level of care. Will there be winners and will there be losers?”	DPR16