

Norfolk County Council's Budget Proposals 2015/16

Equality impact assessments of the proposals



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Norfolk County Council

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Introduction

1. This report summarises the findings of Norfolk County Council's equality assessments of the budget proposals for 2015/16. It also sets out the legal framework for equality assessments, and explains what will happen between now and 16 February 2015, when Full Council will meet to agree the County Council's budget for 2015/16.

About equality assessments

- 2. Under the Equality Act 2010, the County Council and other public bodies must pay due regard to the 'equality duty' when planning, changing or commissioning services:
 - Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by the Act;
 - Advance equality of opportunity between persons who share a protected characteristic¹ and persons who do not share it;
 - Foster good relations² between persons who share a relevant protected characteristic and persons who do not share it.
- 3. It is up to public bodies how they implement the duty. However they must be able to provide evidence that full consideration was given to the duty before a decision is made. Equality assessments are an effective way of demonstrating this.

The purpose of an equality assessment

- 4. The purpose of an equality impact assessment is to identify any potential negative impact a proposal or service change may have on people with protected characteristics. This enables decision-makers to take this into account when making decisions and find ways to avoid or mitigate any negative impact.
- 5. It will not always be possible to adopt the course of action that will best promote equality. However, equality assessments enable informed decisions to be made, that take into account opportunities to minimise disadvantage.

How the Council assesses the equality impact of the budget proposals

- 6. The process comprises the following key steps:
 - Public consultation on the proposals is launched making sure that residents and service users can highlight issues that must be taken into account.
 - The Council gathers evidence on each of the proposals looking at the service users who might be affected, the findings of related equality assessments and public consultation that has already taken place (such as the Council's 'Big Conversation' and 'Putting People First' strategy) and other relevant data and research.
 - The Council publishes the draft assessments on its budget consultation webpages, to enable members of the public and local groups to consider them and give feedback (November 2014).

- When the Council's public consultation on the 2015/16 budget proposals draws to a close (19 December 2014), the results are analysed. The Council makes sure that any equality impacts highlighted by residents inform the final assessments
- The Council publishes the final equality assessments (January 2015).
- Committees consider the assessments during the January 2015 round of committee meetings as part of their budget papers.
- Full Council considers the findings of equality assessments (along with other important information, such as rural assessments) before meeting on 16 February 2015 to agree the Council's budget for 2015/16.

Key findings of the equality assessments

The assessments indicate that two of the Council's budget proposals (reduce the amount the Council spends on transport for people who use adult social care services and reduce arts grant funding) may have an adverse impact on disabled and older people, and some other marginalised groups:

- The proposal to reduce the amount the Council spends on transport for people who use adult social care services may make life more difficult for some disabled and older people in Norfolk, and in some cases, their carers. Some service users may feel their choices are limited. This may impact on their independence and wellbeing, particularly if they live in a rural community where alternative travel options may be restricted and more costly.
- The proposal to reduce funding for the arts may impact on a range of potentially vulnerable people such as disabled and older people, people with learning difficulties and people from marginalised communities. This is because people from these groups are particularly targeted by organisations receiving arts grant funding.

The detailed findings of equality assessments are set out on the following pages. Where potential adverse impact has been identified, the assessment recommends an appropriate mitigating action/s for the Committee to consider as part of the decision-making process.

Human rights implications

10. Public authorities in the UK are required to act compatibly with the Human Rights Act 1998. There are no human rights issues arising from the proposals.



Equality impact assessment

Title of proposal:	Charging for parking at Gressenhall Farm and Workhouse	
Aims of proposal:	Proposal to start charging for car parking at Gressenhall Farm and Workhouse from 1 April 2015.	
Directorate:	Community and Environmental Services	
Lead Officer:	Jo Richardson/Neil Howard	
Names of other officers/partners involved:	Jennifer Holland, Jo Warr, Steve Miller	

Analysis of proposal & potential impact

Overview - more about the proposal

- 1. We are proposing to start charging for car parking at Gressenhall Farm and Workhouse from 1 April 2015. We would not charge Norfolk Museums Pass holders or Friends of Gressenhall for parking. Blue Badge Holders will still be able to park for free.
- 2. Based on our current forecasts and visitor numbers, if we were to charge £1 £2 per car to park for the whole day/visit, we think we could save £15,000 in 2015-16.
- 3. We would collect this charge by using pay and display machines, or car parking attendants on special event days. If we do introduce parking charges we would need to pay a one-off cost of £10,000 for the car-parking 'pay and display' machines. This cost would be removed in 2016-17. This means that the net saving is £5,000 in 2015-16 and £10,000 in 20216-17.
- 4. During 2013 2014 Gressenhall had 65,000 visitors. If the proposal goes ahead, it is estimated that the number of visitors will stay at 65,000
- 5. Currently visitors do not have to pay to park when they visit Gressenhall Farm and Workhouse. However, many similar museums and visitor attractions in Norfolk and elsewhere in the UK do charge visitors and other users of their car parks. The proposal would therefore bring Gressenhall in line with other such attractions.

More about Norfolk's Museum's Service

6. Our museums service runs ten museums as well as a schools service delivered to over 40,000 children a year and work with hard-to-reach groups across Norfolk.

Current 2014 ticket prices to visit the museum are:

- Adult: £9.90
- Concession £8.60 (For visitors with disabilities, unwaged, over 65s or those in full time education)
- Young People (4-18): £6.50
- Family ticket (1 adult + all children) £20.00
- Family ticket (2 adults + all children) £29.00

- Free admission for Norfolk Museums Pass holders, Friends of Gressenhall, and children under 4.
- Visitors with disabilities may bring one companion in free.
- Discounts for groups.
- We currently also offer free admission to the Museum Shop and Mardlers' Rest Café on all non-event days.

Analysis – potential impacts

- 7. At this stage, no significant detrimental or disproportionate impact on people with protected characteristics is identified.
- 8. If the proposal goes ahead, Blue Badge Holders will still be able to park for free. This is something that disabled people have welcomed in consultation and an acknowledgement of the fact that disabled people tend to fall into lower income groups compared to other people.
- 9. It should be noted however that disabled residents have told us that due to changes in the eligibility criteria for Blue Badges, there is a rise in the number of people with mobility difficulties who are now unable to obtain a Blue Badge. This may be an issue to take into account in the final decision about this proposal.
- 10. If the proposal goes ahead, it will be important to ensure that the pay machine procured and its location within the car park is fully accessible.

Action to address any negative impact

	Action/s	Lead	Date
1.	Consideration to be given to the type and location	Steve Miller	By 1 April
	of Pay Machine procured to ensure accessibility		2015

- Relevant legislation: Equality Act 2010 and Public Sector Equality Duty; Human Rights Act 1998
- The findings of public consultation including feedback from residents and stakeholders in the Council's two most recent budget consultations (the Big Conversation and Putting People First), as well as public consultation on the budget proposals for 2015/16 launched on 5 September 2014.
- Museums attendance figures



Equality impact assessment form

Title of proposal:	One-off sale of antiquarian library stock	
Aims of proposal:	To generate an estimated £100,000 in	
	2015/16 and 2016/17.	
Directorate:	Community and Environmental Services	
Lead Officer:	Jo Richardson/Neil Howard	
Names of other officers/partners	Jennifer Holland, Janet Holden	
involved:		

Analysis of proposal & potential impact

- We currently own some old and rare books that are in safe storage. We do not lend these books out to people as they are either too valuable or simply 'of their time'. The books are not about Norfolk or by Norfolk authors and do not relate to Norfolk's local history or culture so they are not of value to the service nor to the Norfolk Record Office. As the books are only of specialist interest it is unlikely that we would ever display them. They may however be of interest to collectors of old and unusual editions.
- 2. We propose to sell a selection of these books at auction. Although we have not yet had them valued by specialist auctioneers we estimate that selling some, with appropriate advice, could raise £100,000 in 2015/16 and 2016/17.
- 3. At this stage, no significant detrimental or disproportionate impact on people with protected characteristics is identified.
- 4. The only potential equality implication arising from this proposal might be if any of the books were of particular value to a minority community in Norfolk, for example, relating to the community's culture, history or identity. However, we know this not to be the case.

Action to address any negative impact

N/A



Equality impact assessment

Title of proposal:	Charge people to visit the Ancient House
	Museum in Thetford in the winter
Aims of proposal:	To raise additional funds by charging people
	to visit during winter months
Directorate:	Community and Environmental Services
Lead Officer:	Jo Richardson/Neil Howard
Names of other officers/partners	Jennifer Holland, Jo Warr, Steve Miller
involved:	

Analysis of proposal & potential impact

Overview - more about the proposal

- People can currently visit the Ancient House Museum in Thetford for free between October and March. The Museum previously charged for admission during this period but stopped charging in 2006 to help the museum grow its visitor numbers. We propose to raise an additional £3,000 in 2015-16 by charging people to visit during these winter months. This estimate is based on our current admission charges and visitor forecasts. The attendance for Ancient House Museum this year is estimated at 8,600 visitors.
- 2. If this proposal goes ahead we would start charging people in October 2015. Norfolk schools and other key groups including our Teenage History Club will still be able to visit for free. We would also continue to open Ancient House Museum free of charge during the year as part of national events including Museums at Night and Heritage Open Days.
- 3. Here are our current charges for visiting the Ancient House Museum between April and September. If the proposal goes ahead these charges would apply all year round:
 - Adult: £3.95
 - Concession: £3.40 (Visitors with disabilities, unwaged, over 65s or in full-time education)
 - Child (4-16): £2.30
 - Family Ticket (1 Adult + all your children): £6.50
 - Family Ticket (2 Adults + all your children): £10.00
 - Pop in for a £1: One hour tickets available every day 1 hour before closing time.
 - Free admission: Museum Pass holders, Friends of Ancient House Museum, Children's University members and under 4s, Norfolk schoolchildren.

Analysis – potential impacts

4. At this stage, no significant detrimental or disproportionate impact on people with protected characteristics is identified.

5. Ancient House Museum in Thetford currently operates a concessionary rate for disabled and older people, which is an acknowledgement of the fact that disabled and older people tend to fall into lower income groups compared to other people. This concession would still apply to people charged admission in the winter months. The museum would also continue to offer some days of free entry, for example as part of the national Museums at Night event and Heritage Open Days. This would enable disabled people and other people on low incomes who might not otherwise be able to afford the entry fee to continue to visit the museum.

Action to address any negative impact

No Action Required

- Relevant **legislation**: Equality Act 2010 and Public Sector Equality Duty; Human Rights Act 1998
- The findings of **public consultation** including feedback from residents and stakeholders in the Council's two most recent budget consultations (the Big Conversation and Putting People First), as well as public consultation on the budget proposals for 2015/16 launched on 5 September 2014.



Equality impact assessment

Title of proposal:	Reduce library staff
Aims of proposal:	We need to make further savings of £80k in 2015/16, and we propose to do this through reducing library staff.
Directorate:	Community and Environmental Services
Lead Officer:	Jo Richardson/Neil Howard
Names of other officers/partners involved:	Jennifer Holland, Jan Holden

Analysis of proposal & potential impact

Overview - the proposal in detail

- 1. Norfolk has 47 libraries and nine mobile libraries. Library staff offer a wide range of advice and support to library users; they help people choose books, find information, learn internet skills, join reading groups and other activities, locate research materials in the library or through interlibrary loans, train volunteers, and create a safe and welcoming environment.
- 2. As part of our Putting People First strategy, we consulted on proposals to change the way we staff libraries. This has meant that some libraries now share managers and we have reduced the number of staff on duty.
- 3. We need to make further savings of £80k in 2015/16, and we propose to do this through reducing library staff. Both staff based in libraries and those working on outreach projects may be affected.
- 4. If our proposal goes ahead, most library users will not be affected. It would not affect opening hours of libraries or mobile libraries. We propose to re-organise staff and reduce staffing on outreach projects. It could mean that there will be fewer staff on duty in some of our libraries, and fewer staff able to work on outreach projects.

Analysis – potential impact

- 5. At this stage, no significant detrimental or disproportionate impact on people with protected characteristics is identified.
- 6. The proposal is clear that most library users will not be affected. Members of the public will still have access to libraries in the normal way, although there may be fewer staff to work on outreach projects.
- 7. If the proposal goes ahead, the amount of work undertaken via activities such as outreach may have to be more focused in the future to ensure the service has the capacity to support such activity. Libraries will use the resources they have available to make sure that staff with the right skills are in the right place to help people whenever possible, to minimise any impact on outreach work and people who particularly need support and help to use the library.

Action to address any negative impact

	Action/s	Lead	Date
1.	Libraries to continue to use the resources they	Jennifer	From 1 April
	have available to make sure that staff with the right skills are in the right place to help people whenever possible, to minimise any impact on outreach work and people who particularly need support and help to use the library.	Holland	2015

- Relevant **legislation**: Equality Act 2010 and Public Sector Equality Duty; Human Rights Act 1998
- The findings of public consultation including feedback from residents and stakeholders in the Council's two most recent budget consultations (the Big Conversation and Putting People First), as well as public consultation on the budget proposals for 2015/16 launched on 5 September 2014.



Equality impact assessment

Title of proposal:	Reduce the Norfolk County Council Arts budget by £150,000 in 2015/16. This will be through a combination of further cuts to the grants programme, and reductions in the other activities of the service.
Aims of proposal:	To reduce the arts budget by $\pounds150,000$ in 2015/16, to make savings of $\pounds150,000$ in 2015/16.
Directorate:	Community and Environmental Services
Lead Officer:	Jo Richardson and Neil Howard
Names of other officers/partners involved:	Jennifer Holland, Steve Miller, Laura Cole

Analysis of proposal & potential impact

Overview - about the proposal

1. Last year we reduced our arts grants budget by £92,250. However, we now need to make further savings, reducing our arts budget by a further £150,000. This will be through a combination of further cuts to the grants programme, and reductions in the other activities of the service.

More information about the proposal

- 2. Arts organisations provide countywide cultural activities that are accessible to residents and visitors alike, and which help to raise the profile of Norfolk as a leading cultural destination to visit and invest in. In 2012 almost 3.4 million tourists and visitors came to Norfolk and in 2013/14, organisations funded by our arts grant budget of £250,480 ran 3,820 events which engaged a total audience of 683,752 people equivalent to around three-quarters of the county's population. This helped to raise the profile of Norfolk and Norwich locally, nationally and internationally.
- The Arts make a significant contribution to the local economy. In 2013/14 grant awards of £250,480 by Norfolk County Council to 19 arts organisations helped to bring in an extra £5,710,382 of external funding, which contributed to an overall income of just over £22 million.
- 4. Additional support from the Council's Arts Project Fund of £20,000 helped 73 small organisations secure match funding of £339,283 from Arts Council England and alternative funders.
- 5. A recent study by the Local Government Association estimated that for every £1 spent by councils on the arts, leverage from grant aid and partnership working brings up to £4 in additional funding to the area.³

Who the proposal is most likely to affect

- 6. This proposal will affect arts organisations who receive arts grants from Norfolk County Council, and the groups and communities they work with, many of whom (34% of the total audience figure - see paragraph 10 below) are from potentially vulnerable or disadvantaged backgrounds⁴. For example:
 - The Garage in Norwich focuses the majority of its activity on vulnerable and hard to reach young people, including looked after children and minority groups.
 - Creative Arts East is leading a three-year Arts and Wellbeing partnership programme, which focuses on older people with dementia or at risk of developing dementia and young people, including care leavers and those in transition from Children's Services to Adult Social Care.
- 7. In 2013/14, the Arts Grant Budget funded organisations provided 418 jobs. It also provided volunteering opportunities for large numbers of people and placements for creative interns and apprenticeships.

What would happen in practice if the proposal goes ahead

- 8. If we reduce the Arts Grant Budget this could mean:
 - Residents and visitors, including residents and visitors from potentially vulnerable or disadvantaged groups, could have fewer opportunities to participate in arts events.
 - Some arts organisations may find it difficult to get further funding from national funding bodies (e.g. Arts Council England). This is because funding via the Arts Grants budget is a means of enabling organisations to access a wide range of external funding, including public funding such as the lottery, Arts Council England (ACE), and trusts and foundations. Almost all such funds require local authority match-funding and support. Some key sources of arts funding will only give grants if there is support from the local council⁵
 - Some larger organisations may not be able to continue their outreach work with other groups.
 - Norfolk may not be able to compete as successfully for arts funding against other parts of the country.

Looking closely at the profile of service users who may be affected

- 9. In 2013/14, the 19 arts organisations that received Arts Grants worked with an estimated total of 237,112 people from potentially vulnerable or disadvantaged groups as participants, volunteers, audience members, artists and performers. This includes:
 - 226,790 members of the audience
 - 8,862 participants and volunteers
 - 1,460 artists and performers

- 10. This figure of 237,112 represents **34%** of the total audience figure of 683,752 for 2013/14.
- 11. A more detailed breakdown is as follows:
 - 99,784 Older People
 - 37,508 Rurally Isolated people
 - 33,059 People with Physical Disabilities & Sensory Impairment
 - 24,367 Children under 5
 - 14,416 People with Mental Health issues
 - 8,280 Young people at risk in low income/deprived circumstances
 - 7,276 People with Learning Difficulties
 - 7,337 Young carers
 - 1,540 Refugees/people from migrant communities
 - 989 People Not in Education, Employment or Training (NEET & PreNEET)
 - 771 Looked After Children
 - 815 Individual young people with rural and/or socio/economic deprivation
 - 510 Young people in challenging circumstances
 - 352 People from Black and Minority Ethnic (BAME) groups
 - 75 People from traveller communities
 - 30 Young mothers and referral families
 - 3 School refusers.

Analysis – potential impacts

- 12. Current data, detailed above, shows that Arts organisations in Norfolk play a key role in delivering outward facing programmes to engage potentially vulnerable and disadvantaged residents in the Arts and promote equality of access. A significant proportion of the Arts Grant Budget 34% currently benefits a large number of residents from potentially vulnerable and disadvantaged groups, including disabled and older people, people with learning difficulties, young people and BAME people.
- 13. Reducing the Arts Grant Budget may reduce opportunities for residents from potentially vulnerable and disadvantaged backgrounds to participate in the arts in Norfolk. This is a significant impact, for a number of reasons. Firstly, evidence suggests that people from these groups are already at risk of social exclusion and isolation, and less likely to participate in the Arts than other people. In addition, they may face a range of barriers to participation for example, they may be on a lower income and have reduced access to transport and the built environment.
- 14. It is also important to consider the potential impact in a broader context. Research shows that people from disadvantaged groups face inequalities in a range of areas for example education, employment, health and civic engagement⁶. The Arts are evidenced to make an important contribution to people's outcomes in these areas. For example, the Department for Culture Media and Sport has found a range of social impacts are significantly associated with both culture and sport engagement, such as:⁷
 - 'Health impacts: Those engaging with the arts as an audience member were 5.4% more likely to report good health.
 - Education impacts: Participants in arts are 14.1% more likely to report an intention to go on to further education.

- Economic productivity related impacts: Unemployed people who engage with the arts as an audience member were 12% more likely to have looked for a job in the last four weeks when compared with unemployed people who had not engaged with the arts.
- Civic participation impacts: People who engage with the arts as an audience member are 6% more likely to have volunteered frequently (once a fortnight or more). Those who engage with the arts as an audience member are also gave £50 per person more in charitable donations over the last year.'
- Another key area that benefits from arts and culture is wellbeing: 'Experiencing arts and culture has demonstrable impacts on wellbeing both directly and indirectly (e.g. through improved physical health). This is particularly of participatory (as opposed to purely spectator) activities.'⁸
- 15. Additionally, arts and culture engagement have been linked directly with better subjective wellbeing:
 - Various studies show a link between engagement with the arts and higher life satisfaction, controlling for other factors such as income and health. Survey and anecdotal evidence also supports the idea that engagement with the arts is good for wellbeing.
 - Participatory arts such as dance and crafts appear to be somewhat more beneficial than audience arts such as theatre.
 - Arts programmes have also been shown to deliver positive results in various specific contexts, from care home residents to young offenders.
 - Various studies suggest a link between arts activity and community cohesion or social capital, a key driver of wellbeing. There is also evidence that arts activities can help combat loneliness and social isolation, particularly among older people.⁹
- 16. The community impact of engagement with the arts organisations that receive Arts Grants is described by users in Appendix 1. This includes quotes from participants from potentially vulnerable and disadvantaged groups.

Fostering social cohesion in Norfolk

17. Arts organisations in Norfolk play a key role in delivering outward facing programmes to foster positive relationships between different communities in Norfolk and provide educative and learning opportunities¹⁰. A reduction in outreach work may impact on this.

Rural issues relating to disability and age

18. Many of the arts organisations that receive Arts Grant funding are based in or service rural communities throughout Norfolk, providing high quality arts provision for rurally isolated communities that they would otherwise find it hard to access. Creative Arts East is a good example of this¹¹. This is another important point to note, because living in a rural location can exacerbate the issues some disabled and older people face – for example, rural isolation and barriers to transport and the built environment¹².

Action to address any negative impact

	Action/s	Lead	Date
1.	Signpost arts organisations to appropriate	Steve Miller	From 1 April
	alternative sources of funding or methods of		2015
	income generation where available.		
2.	Assist arts organisations to plan effectively to mitigate the effects of funding cuts to their organisation.	Steve Miller	From 1 April 2015

- Relevant legislation: Equality Act 2010 and Public Sector Equality Duty; Human Rights Act 1998
- The findings of public consultation including feedback from residents and stakeholders in the Council's two most recent budget consultations (the Big Conversation and Putting People First), as well as public consultation on the budget proposals for 2015/16 launched on 5 September 2014.



Equality impact assessment

Title of proposal:	Remove subsidy we give to schools for community groups using their facilities
Aims of proposal:	Schools in Norfolk are responsible for their own premises and they are able to rent them out for community groups to use outside of schools hours. We propose to stop this subsidy. This would save £97k in 2015/16.
Directorate:	Children's Services
Lead Officer:	Jo Richardson/Neil Howard
Names of other officers/partners involved:	Gordon Boyd, Alison Everitt

Analysis of proposal & potential impact

Overview – the proposal in more detail

- 1. Schools in Norfolk are responsible for their own premises and they are able to rent them out for community groups to use outside of schools hours. We currently subsidise schools who keep their rates at a low threshold for community groups. Our subsidy ensures that the schools' costs are fully covered.
- 2. So far this year 67 schools have registered with us and taken advantage of the subsidy. Of these, 20 are high schools and colleges and 47 are infant, junior and primary schools. That works out at roughly 40% of secondary schools in Norfolk and 14% of primary schools.
- 3. We pay this subsidy directly to schools to help enable voluntary and community groups to use school facilities.
- 4. For a school to receive a subsidy it cannot charge above a set threshold. Here are some examples of the threshold rate. All rates include the cost of one caretaker:
 - 1 hour's football pitch hire £15.28
 - 1 hour's hall hire £18.40
 - 1 hour's classroom hire £8.56
- 5. Any groups running activities specifically for **young people** or **older people** can then benefit from a 15% discount on those rates, and the County Council reimburses the school to cover loss of income from the discount.
- There is also a 100% subsidy available to Norfolk Schools Association Groups. There is limited take up of this subsidy. This year, six Norfolk Schools Association groups have used school premises and claimed a subsidy. These groups are all providing sports activities

What would happen if the proposal goes ahead

7. If we stopped the subsidy, this would save £97k in 2015/16. This would mean that schools will no longer be able to claim the subsidy and will need to decide whether they pass the increased cost onto the groups hiring their facilities. This is in line with broader changes to school funding, where money is delegated to schools who can then decide how it is spent. This could mean that some schools decide to increase the rate that they charge community groups to use their school. However, it should be noted that under the current system, schools can already increase the rates they charge.

Analysis – potential impact

- 8. At this stage, no significant detrimental or disproportionate impact on people with protected characteristics is identified. However, there are some issues that should be taken into account before any decisions are made.
- 9. If the proposal goes ahead and the Council ends the subsidy, some schools may decide to increase the rate that they charge community groups to use their school. This may mean a small increase in cost to some community groups aimed at younger people under 16 and older people over 65.
- 10. The table below provides some illustrations of what the financial impact of removing the 15% subsidy could be for most community and voluntary groups.

	Typical hourly cost with 15% subsidy	Typical hourly cost without subsidy	Estimated total annual cost of a 3 hour hire per week - with 15% subsidy	Estimated total annual cost of a 3 hour hire per week - without subsidy
Football pitch hire	£12.99	£15.28	£2033.36	£2,391.82
Hall hire	£15.64	£18.40	£2448.17	£2880.20
Classroom hire	£7.28	£8.56	£1139.56	£1339.92

- 11. Evidence shows that both younger and older people are more likely to be in lower income groups. This means it is possible that some community groups for younger and older people may be unable to afford the increased cost.
- 12. A small number of consultation respondents have expressed concerns that the proposal could lead to community groups ceasing to run activities or increasing charges to participants. This includes representatives of community groups that would be directly affected by the proposal, and some of these specify that they work with young people, including those who are harder to reach or from ethnic minorities. Several respondents comment that the removal of the subsidy may affect disadvantaged individuals and communities and could prevent people on lower incomes accessing opportunities.
- 13. Young people and older people experience social exclusion and discrimination in a variety of forms which is why 'age' is a protected characteristic¹³. The nature and extent of this depends on different socio-economic factors such as where people live and their relative income. Consultation with younger and older people in Norfolk

shows that opportunities for social interaction and learning are regularly highlighted as a priority and an important mechanism for tackling social exclusion. This is particularly the case in rural areas where there might be fewer opportunities for participation.

14. If removing the subsidy may cause difficulties for some older or younger people's groups which currently benefit, it might be possible to help them find alternative ways to operate. This could be explored as a mitigating action.

Action to address any negative impact

	Action/s	Lead	Date
1.	Signpost advice to older or younger people's groups that might consider closing if the subsidy is	Gordon Boyd	From 1 April 2015
	removed to help them find alternative ways to operate.		

- Relevant legislation: Equality Act 2010 and Public Sector Equality Duty; Human Rights Act 1998
- The findings of public consultation including feedback from residents and stakeholders in the Council's two most recent budget consultations (the Big Conversation and Putting People First), as well as public consultation on the budget proposals for 2015/16 launched on 5 September 2014.
- Schools community group registration form to Norfolk County Council
- Norfolk County Council Einstein recording system
- Star accounts finance system



Equality impact assessment

Title of proposal:	Reduce the amount we spend on transport for people who use Adult Social Care services	
Aims of proposal:	 Ensure that where people have a Motability vehicle or mobility allowance for their transport they are using these. Meet people's needs locally so that we don't have to pay for them to travel long distances to get their service. Make more use of community transport services and public transport, where available and people can use them. 	
Directorate:	Adult Social Services	
Lead Officer:	Jo Richardson/Neil Howard	
Names of other officers/partners involved:	Janice Dane and Tracy Jessop	

Analysis of proposal & potential impact

Overview - about the proposal

- 1. The County Council currently spends over £7 million each year on providing transport for people who receive social care and social care funding.
- 2. Last year we asked people's views about a proposal to save £2.1m on transport in 2014-17. The Council agreed this proposal, which meant that we changed the way we allocated personal budget funding for people so that they got less money for transport. Given our financial pressures, we now need to save more money from our transport budget. We are proposing to save an extra:
 - £100,000 in 2015/2016
 - £900,000 in 2016/2017 and
 - £800,000 in 2017/18.
- 3. We propose to save this money by making sure that where people have a Motability vehicle or mobility allowance for their transport they are using these. We will ask people to use the service that is closest to them if this will meet their needs and if they prefer to use a service that is further away, we would not pay for them to travel there. We will also try harder to meet people's needs locally so that we don't have to pay for them to travel long distances to get their service. We also propose to make more use of community transport services and public transport, where these are available and we think people can use them.

Who the proposal is most likely to affect

4. This proposal will affect people who receive a transport service from Adult Social Care and people who use their personal budget to pay for transport. It will particularly affect older people, disabled people and people with a learning disability.

What would happen in practice if the proposal goes ahead

- 5. If this proposal goes ahead we would look more closely at transport costs when we assess what social services people need. This means that:
 - We will make sure people are using their Motability vehicle or mobility for their transport.
 - We would ask people to use public transport or community transport where we assess that they are able to do this.
 - We would ask people to use the service that is closest to them if this will meet their needs, for example, their local day centre. If they don't want to use the local service as they prefer to use a service that is further away, we would not pay for them to travel there.
 - If we could not find a service that meets people's needs in their local area we would not automatically pay for them to travel a long way to get the service elsewhere. Instead we would work with the person who needs the service and their carer/s to come up with a more creative solution that involves less travel. For example a group of people in a town could pool their Personal Budgets and pay for a personal assistant to help them access local services rather than travel to a day centre in another town.
 - If we cannot meet people's care needs through the options listed above, we would pay for people's transport through their personal budget.
- 6. We would start using the new policy from 1 April 2015. We would assess all new service users under the new criteria. We would re-assess existing service users, who use their personal budget to buy transport or who have their transport paid for by the department, at their annual review.

Looking closely at the profile of service users who may be affected

The Transport Plus service

- 7. The County Council, through the Transport Plus service, arranges transport for social care clients, including those with personal budgets. The service currently supports 2,100 service users, arranging around 568,000 individual journeys each year.
- 8. A significant number of people (over 39%) using the Transport Plus service are 75+ years old¹⁴. Around 10% of service users are under 30 years of age. This is important to note because research shows that service users may have different transport needs depending on their age¹⁵. For example, young disabled people, particularly those in rural areas, may rely on accessible transport to attend educational and social/leisure opportunities. As people age, they may become less mobile and more reliant on transport. Disabled people of all ages are at risk of social isolation, especially in rural areas¹⁶.

- 9. Around 50% of people using the transport service are from rural areas. This is an important point to note, as disabled and older people from rural areas are likely to have more complex transport needs than people living in urban areas. They are likely to need to travel further or pay more to get to services than those living in urban areas. In addition, they may have limited public transport options, and the public transport options available may not be accessible.
- 10. People use the transport service mostly to access day services and day/leisure activities. Other uses include getting to respite care, to colleges and other educational establishments, to visit council offices, places of worship and community hospitals.

People who use personal budgets to pay for transport

- 11. The Council is not able to record detailed data on all of the things that people spend their personal budgets on and as such isn't able to analyse what journeys everyone might use theirs for. In view of this, the Council has written to everyone receiving a direct payment (and those currently in receipt of a transport service around 4,000 in total) asking service users for their views, to make sure we fully understand the potential impact of this proposal on these users.
- 12. Overall, the Council provides personal budgets to around 9,152 people every year. Around 49% of people in receipt of personal budgets are aged 75 and over¹⁷. More women than men (61% vs 39% are in receipt of a personal budget – probably as a result of gender-related mortality trends.
- 13. 48% of people in receipt of personal budgets are from rural communities¹⁸.

People in receipt of a Motability vehicle or mobility allowance

- 14. If the proposal goes ahead we will make sure people are using their Motability vehicle or mobility allowance for their transport. Motability vehicles and mobility allowance are paid from Personal Independence Payments (PIP), a new national benefit introduced in April 2013, replacing Disability Living Allowance (DLA) for eligible people aged 16 to 64. PIPs cover 'daily living' and 'mobility'. The mobility component is paid at either a 'higher' rate (£55.25 per week) or a 'lower rate' (£21 per week). People on the higher rate have severe walking difficulties and people on the lower rate need guidance or supervision outdoors.
- 15. People can choose to exchange their higher rate mobility allowance to lease a car, scooter or powered wheelchair ('Motability vehicles'). PIP's are not means-tested or taxable and can be paid whether people are working or not.
- 16. The Government estimates that it will be around two years before all eligible people will have transferred to PIP. In view of this the most reliable indication of the number of people in receipt of a Motability vehicle or mobility allowance in Norfolk are the DLA figures for 2012/2013. These figures show that at the last count, around 44,000 people across Norfolk claimed DLA¹⁹, with around half of all claimants falling into the 'higher rate' mobility category²⁰. The majority of higher rate claimants were aged 50+, with a fairly even balance between the number of male and female claimants. Around 48% of recipients lived in rural areas²¹.

Analysis – potential impacts

19. Our analysis suggests this proposal may have an adverse impact on disabled and older people, for the reasons highlighted below:

(a) We will make sure people are using their Motability vehicle or mobility allowance for their transport.

- 17. This aspect of the proposal may impact on disabled and older people regardless of where they live. However, it may particularly impact upon service users living in rural areas, because people in rural areas may need to travel further to reach services and may have limited access to accessible community or public transport, making accessible travel more challenging and costly. There are similar issues for people receiving the higher rate mobility allowance.
- 18. Another issue is that Motability vehicles can be used by or for the benefit of the disabled person. This means that in some instances the disabled person does not drive the car indeed the majority of people with a learning disability are unable to drive and instead their carer or other family members do, and use the vehicle for shopping, travel to work or other routine activities. For some people this means that their Motability vehicle and/or their carer may not be available at certain times.
- 19. There is also a potential impact on carers, including informal carers. Some carers have said that if people are asked to use their Motability vehicle or mobility allowance to access services instead of arranged transport, informal carers may in many cases be required to drive. Where services are a significant distance from the service user's house this could mean carers having to cover a lot of extra miles in one day. Respondents have suggested that this could lead to carers having to give up other commitments, such as work, or losing valuable respite time.
- 20. Service users have also highlighted the impact of changing from arranged shared transport to use of a Motability vehicle. Some have suggested that moving from independent travel to being escorted by parents or family members undermines their dignity and independence.

(b) We would ask people to use public transport or community transport where we assess that they are able to do this.

- 21. Not all public or community transport services will be sufficiently accessible for all disabled and older people to use them. Also, whilst a transport service may be accessible in one direction, this might not be the case for the return journey.
- 22. The reliability of public and community transport provision is also an issue. For example, the late or non-arrival of a bus may cause discomfort for someone who is unable to stand or sit for long. Service users have highlighted incidents where they have been stranded for several hours waiting for an accessible bus to appear.
- 23. Some consultation respondents have highlighted the significant extra costs that they might have to incur to use public transport where a carer would be required to help them access transport the service user would be required not only to pay for their own public transport, but potentially also for the carer's transport. They might have to pay for the carer to accompany them there and back.

- 24. Consultation with residents shows that the disability awareness of bus drivers has a key role to play in disabled people's confidence in using public transport²². For example, a bus driver with good disability awareness will make sure that a disabled person with communication difficulties does not feel rushed into buying a ticket and has time to make enquiries, and someone with mobility difficulties has time to sit down safely before the vehicle moves off.
- 25. Consultation with disabled residents in Norfolk shows that fear of hate crime or hostility and discrimination by members of the public is sometimes a factor deterring use of public transport²³.
 - (c) We would ask people to use the service that is closest to them that will meet their needs, for example, their local day centre. If they don't want to use the local service as they prefer to use a service that is further away, we would not pay for them to travel there.
- 26. Part of the disability rights movement has been to put disabled people at the centre of decision-making about services that affect them. The adage "Nothing about us, without us" arose from disabled people's experiences that decisions were sometimes made on their behalf without their involvement or against their wishes. If the proposal goes ahead, some disabled people may feel they are being allocated a service based on what is 'perceived' as their primary need.
- 27. A range of complex issues may inform a disabled person's preference about where they go. For example, they may have long-standing friendships with trusted people at a particular venue. It may not be as easy for some disabled people to make and sustain friendships as people who are not disabled. This may be a particular issue for someone with communication difficulties. Disabled people are more likely than non-disabled people to have a limited social network and are at greater risk of social isolation. A disabled person may wish to travel long distances to attend a venue which offers the only social contact they have with others.
 - (d) If we could not find a service that meets people's needs in their local area we would not automatically pay for them to travel a long way to get the service elsewhere. Instead we would work with the person who needs the service and their carer/s to come up with a more creative solution that involves less travel. For example a group of people in a town could pool their Personal Budgets and pay for a personal assistant to help them access local services rather than travel to a day centre in another town.
- 28. This aspect of the proposal could present disabled people with some genuine opportunities to improve provision in their area and tailor it specifically to their needs. The idea of pooled personal budgets initiatives has been a success in some areas of Norfolk.
- 29. There might also be an opportunity to use this initiative as a way of supporting service users to become involved in existing mainstream community activities in their area, which might not currently be accessible, but which, with the right intervention, could become accessible and meet service users' needs.
- 30. There are some issues to take into account in taking this part of the proposal forward. Local venues (eg community centres) in some rural areas of Norfolk may

not be fully accessible to all disabled people. Another issue is that some disabled people may experience fatigue as an effect of their disability, which may limit the investment they are able to make in establishing new initiatives.

31. In taking this forward, plans would need to be in place detailing the resources available to service users in helping them plan and implement initiatives for pooling budgets. For example, support regarding finding a venue; setting up transport; personal budget arrangements; supporting people in setting up a group and putting in appropriate safeguards in case someone became ill or transport failed to arrive. Staff supporting service users in this work will need a range of skills, which, depending on the initiative, could include community development skills.

(e) If we cannot meet people's care needs through the options listed above, we would pay for people's transport through their personal budget.

32. The proposal is clear that if none of the above options are possible, then the Council will pay for people's transport through service users' personal budgets. The main issue here is that some disabled people, particularly those in rural areas, might have complex transport needs and the proportion of their personal budget that may need to be used for transport may be higher than for other people²⁴. This may only affect a small number of service users, but for the purposes of this assessment it is important to highlight.

(f) Other issues

33. Consultation with disabled and older people in Norfolk consistently highlights access to transport as a major enabling factor²⁵ and doorway to participation in education, employment and social opportunities. Disabled people are less likely to achieve in education or gain employment²⁶ than non-disabled people and are at greater risk of social isolation. They are more likely to experience barriers to the built environment and transport and fall into low income groups.

Human Rights implications

- 34. The impact upon the human rights of individuals affected by this proposal has been considered in relation to the Human Rights Act 1998 and the European Convention of Human Rights.
- 35. The Convention rights that may apply in relation to individuals affected by this proposal are Article 8 (Right to respect for private and family life). This right is broader than simply protecting personal privacy. It also covers issues such as:
 - Being able to maintain and establish relationships with others (including family relationships)
 - Being able to participate in the life of your community
 - Being able to access medical treatment
 - Respecting the confidentiality of personal information
 - Respecting physical and mental well-being
 - Respecting rights to make choices about things that affect the individual
 - Being able access personal information
- 36. These rights have been carefully considered and it is concluded that they are not engaged in relation to this specific proposal.

Action to address any negative impact

	Action/s	Lead	Date
1.	Work with service users as part of the assessment and review process to identify the social care transport needs and options available to service users, taking their individual needs fully into account.	Janice Dane	From 1 April 2015
2.	Where the assessment process highlights areas of limited accessible community or public transport provision in some parts of the county, which might result in affordability issues or a loss of independence for service users, work with service users to try to find ways to address this, offering where appropriate travel planning support to make sure people are spending as effectively as possible.	Janice Dane	From 1 April 2015
3.	Where the assessment process highlights areas of limited accessible community or public transport provision in some parts of the county, work with commissioners, communities and community transport providers to find opportunities to address this, and inform strategic transport planning, to enable consideration to be given to whether there are opportunities to address this at a strategic level over the medium/long term.	Janice Dane	From 1 April 2015
4.	Provide service users with support to help them plan and establish pooled budgets. Ensure staff supporting service users in this work have the appropriate skills – eg this may include community development skills. Monitor the extent to which service users are able to participate in this initiative.	Janice Dane	From 1 April 2015
5.	Continue ongoing dialogue with transport providers to promote disability awareness and identify where further action can be taken to improve accessibility and increase the confidence of disabled people in using community and public transport.	Tracey Jessop	From 1 April 2015
6.	Monitor the implementation of these mitigating actions, reporting back to the committee at six monthly intervals on progress.	Janice Dane	From 1 April 2015

- Relevant **legislation**: Equality Act 2010 and Public Sector Equality Duty; Human Rights Act 1998
- The findings of public consultation including feedback from residents and stakeholders in the Council's two most recent budget consultations (the Big Conversation and Putting People First), as well as public consultation on the budget proposals for 2015/16 launched on 5 September 2014. As part of this

consultation, the Council has written to everyone receiving a direct payment and those currently in receipt of a transport service - around 4000 in total asking service users for their views, to make sure we fully understand the potential impact of this proposal on these users. Five consultation events for service users have been held across the county.



Equality impact assessment form

Title of proposal:	Highways Maintenance	
Aims of proposal:	Make a permanent saving on highway	
	maintenance	
Directorate:	ETD	
Lead Officer (author of the proposal):	Jo Richardson/Neil Howard	
Names of other officers/partners	Nick Tupper, Sarah Rhoden	
involved:		

Analysis of proposal & potential impact

Overview – about the proposal

- 1. In 2013/14 our budget for highway maintenance was £24.128m.
- 2. Last year we asked peoples' views on a proposal to make a one-off saving of £1m on highway maintenance. The council agreed this proposal which meant that our budget for highway maintenance for 2014/15 was £23.128m. However, we now need to save more money from our highway maintenance budget. We are therefore proposing to make a permanent saving on highway maintenance of £385k.
- 3. If this proposal goes ahead, the total amount we would spend in 2015/16 would be £23.743m. It would also mean that during 2015/16 we would have to reduce the amount of highway maintenance work we do across Norfolk.
- 4. We would continue to carry out all urgent work and any work that is needed to keep people safe. However, our proposal could mean:
 - It may take longer for some road markings to be re-painted
 - It may take longer for some damaged verges to be repaired
 - We may postpone some bridge maintenance work
 - We may inspect traffic signals less often although we would still meet national standards
 - We may only repair safety barriers where they have been damaged and postpone our routine maintenance work.

More information about the proposal

- 5. We have a legal duty to maintain the highway, making it safe for road users and dealing with small repairs to prevent larger defects occurring. We meet this duty through a wide range of activities including pothole repairs, road patching, drain cleaning, grass cutting, sign cleaning, winter maintenance, bridge and culvert repairs and emergency response to incidents on the highway.
- 6. We prioritise highway maintenance work by looking at the strategic importance of the road and how severe the problem is. This process is set out in Norfolk's Transport Asset Management Plan.

- 7. We propose to make a permanent cut of £385,000 from highways funding from 2015/16.
- 8. Here is some more information about what the proposals could mean:
 - **Road markings** we have an intervention programme for re-painting road markings. We tackle these in order of priority, for example, stop line replacements would take priority over markings that define the edge of a carriage way. It may take longer for some non-urgent road markings to be re-painted.
 - Verge damage repair some non-urgent repairs may need to wait longer than those that we consider urgent because they represent a danger.
 - **Bridge maintenance** we would continue to complete any urgent works. However, we may postpone some non-urgent bridge works.
 - **Traffic signals** new traffic signals are more reliable and require less regular inspections. This will mean we will inspect some equipment less frequently. We would carry on making urgent repairs to faulty lights.
 - **Safety barriers** we would carry on repairing damaged safety barriers but postpone our routine maintenance work.
 - **Grit bins** we would maintain grit at the same level as in 2014-15. We will continue to inform communities about the best way to use grit during periods of snow and ice as there is currently a tendency for people to use too much.

Analysis – potential impact

- 9. At this stage, no significant detrimental or disproportionate impact on people with protected characteristics is identified.
- 10. Although there will be some local community impact around verge aesthetics, there should not be any impact on paths or walkways that disabled people, older people and parents would use to access local services and bus stops.

Action to address any negative impact

No Actions required

- Relevant **legislation**: Equality Act 2010 and Public Sector Equality Duty; Human Rights Act 1998
- Highways Act 1980
- PROW (Public Right of Way) maintenance
- County Transport Asset Plan
- The findings of public consultation including feedback from residents and stakeholders in the Council's two most recent budget consultations (the Big Conversation and Putting People First), as well as public consultation on the budget proposals for 2015/16 launched on 5 September 2014.

1 The **protected characteristics** are: age; disability; gender reassignment; pregnancy and maternity; race; religion or belief; sex; sexual orientation.

Having due regard to the need to advance equality of opportunity might mean:

(a) Removing or minimizing disadvantages suffered by people who share a relevant protected characteristic that are connected to that characteristic;

(b) Taking steps to meet the needs of people who share a relevant protected characteristic that are different from the needs of others;

(c) Encouraging people who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such people is disproportionately low.

2 Having due regard to the need to foster good relations between people and communities involves having due regard, in particular, to the need to (a) tackle prejudice, and (b) promote understanding.

³ LGA 2013, Driving Growth through local authority investment in the arts, <u>http://www.local.gov.uk/c/document_library/get_file?uuid=5d54ddf4-1025-4720-810a-fd077d5dbf5b&groupId=10180</u>

⁴ People from potentially vulnerable or disadvantaged backgrounds may have one or more 'protected characteristics'; these include age; disability; gender reassignment; pregnancy and maternity; race; religion or belief; sex; sexual orientation.

⁵ The importance of this partnership between Arts Council England and local authorities is explained in the following quote: 'The Arts Council cannot make up any shortfall in local authority funding. We place immense value on our relationship with local government, and we want to work with those local authorities that continue to value and invest in arts and culture. In practical terms, this means developing sustainable long-term partnerships with local government where there is a shared agenda for the arts – where the arts are understood as key to a community's well-being and prosperity and where there is alignment with our goals.'

Ed Vaizey MP, Minister of State at the Department for Culture, Media and Sport and the Department for Business, Innovation and Skills, with responsibility for digital industries, recently advised the Department for Culture Media and Sport Committee into the Work of Arts Council England, that: 'It is important that the Arts Council does stress to local authorities it is there as a partner, rather than a funder of last resort—somebody to bail out arts organisations that the local authorities are walking away from.'

6 Fairness & Freedom: The Final Report of the Equalities Review, Cabinet Office, 2007

7 DCMS, Quantifying the Social Impacts of Culture and Sport, Department for Culture Media and Sport, April 2014

www.gov.uk/government/uploads/system/uploads/attachment_data/file/304897/Quantifying_the_Social Impacts_of_Culture_and_Sport.docx

⁸ Page 7, Wellbeing in Four Policy Areas: Report by the All-party Parliamentary Group on Wellbeing Economics & New Economics Foundation (NEF), Sept 2014, <u>http://b.3cdn.net/nefoundation/ccdf9782b6d8700f7c_lcm6i2ed7.pdf</u>

⁹ Page 37, Wellbeing in Four Policy Areas: Report by the All-party Parliamentary Group on Wellbeing Economics & New Economics Foundation (NEF), Sept 2014, http://b.3cdn.net/nefoundation/ccdf9782b6d8700f7c_lcm6i2ed7.pdf

¹⁰ 'Participation in the arts can contribute to community cohesion, reduce social exclusion and isolation and make communities feel safer and stronger.' - Page 97, Create, A journal of perspectives on the value of art and culture, Arts Council England, 2014, http://www.artscouncil.org.uk/media/uploads/value-sota-create/Create Digital Singles V1.pdf

¹¹ Through their rural touring programme they work in partnership with local volunteers to bring professional theatre, music, cinema and cultural opportunities to rural and disadvantaged communities across Norfolk, Suffolk and the East. A participant in the CAE Live scheme commented: *'The events my family, friends and I have attended have all been wonderful and have brought the whole community together. Without these events, the village communities would be even more isolated.*Comment from Creative Arts East website:

http://www.creativeartseast.co.uk/live-performance/

¹² Page 37, Wellbeing in Four Policy Areas: Report by the All-party Parliamentary Group on Wellbeing Economics & New Economics Foundation (NEF), Sept 2014,

http://b.3cdn.net/nefoundation/ccdf9782b6d8700f7c_lcm6i2ed7.pdf; Arts and cultural provision can have a positive impact on specific health conditions such as: dementia, Parkinson's and depression. Page 97, Create, A journal of perspectives on the value of art and culture, Arts Council England, 2014, http://www.artscouncil.org.uk/media/uploads/value-sota-

<u>create/Create_Digital_Singles_V1.pdf;</u> Evidence shows that disabled people are more likely than non-disabled people to experience barriers to participation in arts: *'disabled audiences' patterns of engagement are largely dictated by practical factors* (such as access and transport) *which, unaddressed, can become barriers'*. Page 21, Equality and diversity within the arts and cultural sector in England, Evidence and literature review final report, Arts council England, September 2014,

http://www.artscouncil.org.uk/media/uploads/Equality and diversity within the arts and cultural sector in England.pdf

13 The Equality Act 2010

14 Age of Transport Plus Clients: (latest data available on 24 November 2014)



15 Travel behaviour, experiences and aspirations of disabled people, Department for Transport, 2008; Young People with Special Educational Needs/Learning Difficulties and Disabilities: Research into Planning for Adult Life and Services, LG Group Research Report, Martin, K., Hart, R., White, R. and Sharp, C, September 2011

16 Preventing loneliness and social isolation: interventions and outcomes, Karen Windle, Jennifer Francis and Caroline Coomber, Social Care Institute for Excellence, 2001





¹⁸ Personal budget users in 2012-13 by where they live



¹⁹ Department for Work & Pensions
 ²⁰ DLA higher rate mobility claimants, February 2013 data

Age	Total	Male	Female
All ages	21,920	10,080	11,830
Aged 16-24	530	300	230
Aged 25-49	4,220	1,810,	2,410
Aged 50-64	7,880	3,450	4,230
Aged 65+	8,780	4,120	4,860

21 Department for Work & Pensions

- 22 Norfolk County Council Disability Pilot Project 2010
- 23 Norfolk County Council Disability Pilot Project 2010
- 24 Priced out: ending the financial penalty of disability by 2020, SCOPE, 2014 25 Norfolk County Council Disability Pilot Project 2010

26 Fairness & Freedom: The Final Report of the Equalities Review, Cabinet Office, 2007