



Department for
Communities and
Local Government

Funding Local Authorities to support former Independent Living Fund recipients: The Former ILF Recipient Grant

Technical Consultation



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Scope of the consultation

Topic of this consultation:	This consultation seeks views on the funding for Local Authorities in meeting Care Act 2014 duties to former Independent Living Fund recipients. It covers the following; <ol style="list-style-type: none"> 1. The value of the grant to be paid; 2. The distribution methodology
Scope of this consultation:	We are keen to hear the views of all parties with an interest in the ongoing funding of local authorities in support of their duties towards former Independent Living Fund recipients.
Geographical scope:	These proposals relate to England only.
Impact Assessment:	A draft Equality Statement can be found at Annex C. We also welcome views on this as part of the current consultation.

Basic Information

To:	The consultation will be of particular interest to local authorities, former Independent Living Fund clients and disability interest groups
Body responsible for the consultation	Local Government Finance directorate within the Department for Communities and Local Government.
Duration:	This consultation will last for 6 weeks from Wednesday 10 th February 2016 to Tuesday 22 nd March 2016.
Enquiries:	For any enquiries about the consultation please contact Lorenzo Peri at: Lorenzo.Peri@communities.gsi.gov.uk or 0303 444 2131
How to respond:	By email to: FormerILFGconsultation@communities.gsi.gov.uk Or by post to: Lorenzo Peri Department for Communities and Local Government 2 nd floor, Fry Building 2 Marsham Street London SW1P 4DF Please state whether you are responding as an individual or representing the views of a local council or other organisation. If responding on behalf of an organisation, please include a summary of the people and any other organisations it represents and, where relevant, who else you have consulted in reaching your conclusions.

Section 1: Introduction

Aim

1.1 The aim of this consultation is to set out the amount and proposed distribution of the new 'Former ILF Recipient Grant', which compensates for the cost pressures caused by the closure of the Independent Living Fund (ILF). The consultation invites comments on the proposed methodology for the value of the grant and the allocation of the funding.

Background

1.2 The Independent Living Fund (ILF) was established in 1988 to enable disabled people to continue to live in the community rather than in residential care. It was managed by the ILF Trust, set up by the Department for Work and Pensions.

1.3 Following a decision by the Coalition Government, the ILF was closed on 30 June 2015, creating a single care system, managed by Local Government. This followed the introduction of the Care Act 2014 which ensures that the key features of ILF support, namely personalisation, choice and control, are now part of mainstream adult social care system.

1.4 In announcing the decision to close the ILF, the Government stated that funding for 2015/16 in respect of former ILF users was to be distributed between councils in England and the devolved administrations in Scotland and Wales, in a way that reflected the ILF's forecast expenditure in each area at the point of closure.

1.5 At the time of the ILF's closure there were agreed support packages for English ILF users amounted to £186.2 million for 2015/16. The ILF Trust deducted 25 per cent of this total to cover payments during the first quarter of 2015-16. The remaining 75 per cent, £139.7 million, represented the maximum amount that local authorities would need to allow them to fully fund the remaining commitments to former ILF users for the remainder of the financial year.

1.6 The Government therefore issued a grant worth £139.7 million to local authorities in England, covering the remaining 9 months of 2015-16.

Section 2: Value and Distribution Methodology

2.1 This section outlines:

- 2.1.1 the Government’s proposed future value of funding for councils in support of their duties under the Care Act 2014 to former ILF recipients,
- 2.1.2 the methodology in calculating local authority allocations; and

Value

2.2 With the ILF Trust now closed the Government are not able to make an assessment of the actual remaining commitments to former ILF clients for 2016-17. To calculate the on-going funding required until the end of the parliament, the option proposed is to use the now-closed ILF Trust’s financial model. The model makes use of expenditure trends over several years to estimate the funding that would be required to enable Local Authorities to continue to fully fund the care packages of former ILF users, in each year of the parliament. The model predicts that commitments will decline year on year, as former users no longer need access to funding. A full calculation and detail of the assumptions that the model takes in to account can be found at Annex A.

2.3 The calculation, for the course of the Parliament, of the level of the Former ILF Recipient Grant is set out in Table 1.

Former ILF Recipient Grant	2015-2016 (£m)	2016-2017 (£m)	2017-2018 (£m)	2018-2019 (£m)	2019-2020 (£m)
Modelled Expenditure for financial year	183.6 ¹	173.9	165.2	157.0	149.1
Protected for inflation	N/A	176.9	171	165.6	160.6

Table 1: Former ILF Recipient Grant amount over the course of the parliament

Q1. Do you have any comments on the proposal to use the ILF model to calculate the value of the Former ILF Recipient Grant?

¹ As the ILF transferred to local authority control part-way through the 2015-2016 financial year (1 July 2015), this has been calculated by using the ILF Trust’s financial model – see Annex A.

Distribution Methodology

2.4 Due to the significant geographical variation in take up of ILF funding across England, the Government believes that distribution of any future funding to local authorities should remain in line with expenditure patterns at the time of the ILF's closure. This approach is, the Government believes, the most accurate way of providing funding to local authorities that reflects former ILF client numbers in individual authorities.

2.5 Annex B sets out the proposed local authority allocations for 2016-2017 through to 2019-2020. The grant paid in 2015-16 was based on actual remaining commitments to ILF users at the time of the ILF's closure. To maintain the direct link between historic ILF client numbers in individual councils, the Government has applied the 2015-16 distribution to the new grant total for each year of the Parliament.

Q2. Do you have any comments or suggestions about the proposal to continue to maintain the link between historic ILF client numbers and the distribution of the Former ILF Recipient Grant?

Section 3: Equalities Statement

3.1 Attached at Annex C is a draft equalities statement setting out our provisional views on the equalities impacts.

3.2 We also welcome views on the draft equalities statement.

Q3. Do you have any comments on the draft equalities statement?

Summary of Questions

Q1. Do you have any comments on the proposal to use the ILF model to calculate the value of the Former ILF Recipient Grant?

Q2. Do you have any comments or suggestions about the proposal to continue to maintain the link between historic ILF client numbers and the distribution of the Former ILF recipient Grant?

Q3. Do you have any comments with our provisional equalities assessment?

Annex A – ILF model calculations and assumptions

Former ILF Recipient Grant	2015-2016 (£m) ²	2016-2017 (£m)	2017-2018 (£m)	2018-2019 (£m)	2019-2020 (£m)
Maximum Expenditure	188 ³	184.4	175.1	166.4	158.1
Expenditure after attrition	184.4	175.1	166.4	158.1	150.3
Expenditure after attrition and suspense	183.6	173.9	165.2	157.0	149.1
Protected for inflation	N/A	176.9	171	165.6	160.6

2.3 The forecasted budget requirement for the 'Former ILF Recipient Grant' is based on the ILF Trust's financial model. The assumptions in the model are as below;

- Attrition, where former users no longer need to access ILF funding, will be at 5.0 per cent, per annum – slightly lower than the 2014-15 year which ran at 5.2 per cent, and;
- average suspense⁴ numbers remain constant at the transfer level i.e. 67 users per month with a value of £1.13 million per year. suspended

2.4 The Government has not recognised the following in the forecasts;

- grant recoveries i.e. unused money returned from users ran annually around the 2 per cent mark under ILF control; and

² For 2015-16 the amount paid to local authorities was £139.7 million which represented the maximum total expenditure at the time of the ILF's transfer to local authority responsibility.

³ The agreed value of remaining support packages at the time of the ILF's closure was £186.2 (see paragraph 1.5). To ensure consistency, the government has calculated all funding from the value of the packages at the beginning of the 2015-2016 financial year which was £188 million.

⁴ Suspense is defined as where funding to an individual is temporarily stopped during a period where the recipient does not require a care package – e.g. periods of stay in hospital.

- 58 former ILF users refused to give consent on their data to local authorities whose combined annual funding amounted to £0.953 million in 2014/15. Given that these were fully funded upon transfer in 2015-16, the Government sees no reason to depart from this approach for future years.

Annex B – Local Authority Allocations

Authority	2016-17	2017-18	2018-19	2019-20
Barking	£488,107	£472,034	£457,128	£443,242
Barnet	£1,476,044	£1,427,439	£1,382,360	£1,340,371
Barnsley	£1,830,619	£1,770,338	£1,714,431	£1,662,355
Bath	£468,244	£452,825	£438,525	£425,205
Bedford	£370,916	£358,702	£347,374	£336,823
Bexley	£684,392	£661,856	£640,954	£621,485
Birmingham	£4,497,367	£4,349,272	£4,211,923	£4,083,985
Blackburn	£424,968	£410,974	£397,996	£385,906
Blackpool	£185,564	£179,453	£173,786	£168,507
Bolton	£945,894	£914,747	£885,859	£858,951
Bournemouth	£275,103	£266,044	£257,642	£249,816
Bracknell	£272,943	£263,956	£255,620	£247,855
Bradford	£2,067,201	£1,999,130	£1,935,997	£1,877,191
Brent	£961,363	£929,706	£900,346	£872,997
Brighton & Hove	£621,780	£601,305	£582,316	£564,628
Bristol	£1,781,970	£1,723,291	£1,668,870	£1,618,178
Bromley	£666,054	£644,121	£623,780	£604,832
Buckinghamshire	£1,128,144	£1,090,995	£1,056,542	£1,024,449
Bury	£317,296	£306,847	£297,157	£288,131
Calderdale	£875,160	£846,341	£819,614	£794,718
Cambridgeshire	£1,313,546	£1,270,292	£1,230,176	£1,192,809
Camden	£865,327	£836,833	£810,406	£785,790
Central Bedfordshire	£458,090	£443,006	£429,016	£415,984
Cheshire East	£947,904	£916,690	£887,741	£860,776
Cheshire West	£1,650,693	£1,596,337	£1,545,925	£1,498,967
City of London	£7,948	£7,686	£7,443	£7,217
City of York	£366,946	£354,863	£343,656	£333,217
Cornwall	£2,854,519	£2,760,522	£2,673,345	£2,592,142
Coventry	£2,558,418	£2,474,171	£2,396,037	£2,323,257
Croydon	£1,057,560	£1,022,736	£990,438	£960,353
Cumbria	£3,569,217	£3,451,685	£3,342,681	£3,241,146
Darlington	£824,465	£797,316	£772,137	£748,683
Derby	£1,174,904	£1,136,215	£1,100,334	£1,066,911
Derbyshire	£2,790,815	£2,698,916	£2,613,684	£2,534,293
Devon	£2,887,837	£2,792,743	£2,704,548	£2,622,397
Doncaster	£751,065	£726,333	£703,395	£682,030
Dorset	£765,103	£739,908	£716,542	£694,777
Dudley	£1,114,278	£1,077,586	£1,043,556	£1,011,858
Durham	£1,699,391	£1,643,431	£1,591,532	£1,543,189

Ealing	£595,497	£575,887	£557,701	£540,761
East Riding	£971,832	£939,830	£910,151	£882,505
East Sussex	£1,052,855	£1,018,185	£986,031	£956,080
Enfield	£799,117	£772,802	£748,397	£725,664
Essex	£5,604,533	£5,419,980	£5,248,817	£5,089,384
Gateshead	£427,121	£413,056	£400,012	£387,862
Gloucestershire	£977,027	£944,855	£915,016	£887,222
Greenwich	£1,191,830	£1,152,584	£1,116,185	£1,082,281
Hackney	£780,854	£755,141	£731,294	£709,081
Halton	£722,640	£698,844	£676,774	£656,217
Hammersmith	£849,952	£821,964	£796,006	£771,827
Hampshire	£4,494,996	£4,346,979	£4,209,702	£4,081,832
Haringey	£749,468	£724,788	£701,899	£680,579
Harrow	£325,087	£314,382	£304,454	£295,206
Hartlepool	£641,457	£620,335	£600,744	£582,497
Havering	£644,777	£623,545	£603,853	£585,511
Herefordshire	£1,296,818	£1,254,115	£1,214,510	£1,177,619
Hertfordshire	£2,140,629	£2,070,140	£2,004,765	£1,943,870
Hillingdon	£542,807	£524,933	£508,355	£492,914
Hounslow	£541,324	£523,498	£506,966	£491,567
Isle of Wight	£164,081	£158,678	£153,667	£148,999
Islington	£1,301,804	£1,258,936	£1,219,179	£1,182,146
Kensington	£504,235	£487,631	£472,232	£457,888
Kent	£2,114,113	£2,044,497	£1,979,932	£1,919,791
Kingston upon Hull	£307,845	£297,708	£288,307	£279,549
Kingston upon Thames	£177,777	£171,923	£166,494	£161,436
Kirklees	£890,948	£861,609	£834,400	£809,055
Knowsley	£1,040,646	£1,006,378	£974,597	£944,994
Lambeth	£679,824	£657,437	£636,676	£617,337
Lancashire	£6,074,689	£5,874,654	£5,689,133	£5,516,325
Leeds	£655,753	£634,159	£614,133	£595,478
Leicester City	£921,187	£890,853	£862,720	£836,515
Leicestershire	£1,279,615	£1,237,479	£1,198,399	£1,161,998
Lewisham	£635,813	£614,876	£595,458	£577,371
Lincolnshire	£1,755,413	£1,697,609	£1,643,998	£1,594,061
Liverpool	£4,748,077	£4,591,726	£4,446,720	£4,311,650
Luton	£452,184	£437,294	£423,484	£410,621
Manchester	£2,184,599	£2,112,662	£2,045,944	£1,983,798
Medway Towns	£793,412	£767,286	£743,055	£720,484
Merton	£331,038	£320,137	£310,027	£300,610
Middlesbrough	£2,012,543	£1,946,272	£1,884,809	£1,827,557
Milton Keynes	£728,691	£704,695	£682,441	£661,712

Newcastle upon Tyne	£1,233,153	£1,192,546	£1,154,885	£1,119,806
Newham	£644,369	£623,150	£603,471	£585,141
Norfolk	£1,518,286	£1,468,290	£1,421,921	£1,378,730
North East Lincolnshire	£189,352	£183,117	£177,334	£171,948
North Lincoln	£598,533	£578,823	£560,544	£543,518
North Somerset	£379,161	£366,676	£355,096	£344,310
North Tyneside	£673,993	£651,799	£631,216	£612,042
North Yorkshire	£1,505,686	£1,456,105	£1,410,121	£1,367,289
Northamptonshire	£857,201	£828,974	£802,795	£778,410
Northumberland	£925,688	£895,206	£866,936	£840,602
Nottingham City	£773,177	£747,717	£724,104	£702,109
Nottinghamshire	£2,918,203	£2,822,109	£2,732,987	£2,649,972
Oldham	£2,841,343	£2,747,779	£2,661,005	£2,580,176
Oxfordshire	£3,803,136	£3,677,901	£3,561,754	£3,453,565
Peterborough	£128,716	£124,478	£120,547	£116,885
Plymouth	£641,067	£619,957	£600,379	£582,142
Poole	£587,403	£568,060	£550,121	£533,411
Portsmouth	£491,763	£475,569	£460,551	£446,562
Reading	£258,732	£250,212	£242,311	£234,950
Redbridge	£816,883	£789,984	£765,036	£741,798
Redcar and Cleveland	£374,697	£362,358	£350,915	£340,256
Richmond upon Thames	£423,023	£409,093	£396,174	£384,140
Rochdale	£543,979	£526,066	£509,453	£493,978
Rotherham	£1,587,564	£1,535,287	£1,486,802	£1,441,640
Rutland	£67,888	£65,653	£63,580	£61,648
Salford	£865,145	£836,656	£810,235	£785,624
Sandwell	£1,129,191	£1,092,007	£1,057,522	£1,025,399
Sefton	£2,319,808	£2,243,419	£2,172,572	£2,106,579
Sheffield	£2,779,575	£2,688,046	£2,603,157	£2,524,086
Shropshire	£1,664,983	£1,610,156	£1,559,307	£1,511,943
Slough	£343,382	£332,075	£321,588	£311,820
Solihull	£846,645	£818,766	£792,909	£768,824
Somerset	£1,313,553	£1,270,299	£1,230,183	£1,192,816
South Gloucestershire	£914,599	£884,482	£856,550	£830,532
South Tyneside	£306,215	£296,132	£286,780	£278,069
Southampton	£441,989	£427,434	£413,936	£401,363
Southend-on-Sea	£418,867	£405,074	£392,281	£380,366
Southwark	£197,361	£190,862	£184,835	£179,220
St Helens	£1,191,321	£1,152,092	£1,115,709	£1,081,819
Staffordshire	£2,557,129	£2,472,925	£2,394,830	£2,322,087

Stockport	£1,015,373	£981,938	£950,928	£922,044
Stockton	£551,965	£533,789	£516,932	£501,230
Stoke-on-Trent	£657,547	£635,895	£615,813	£597,108
Suffolk CC	£2,558,986	£2,474,720	£2,396,569	£2,323,773
Sunderland	£896,972	£867,435	£840,041	£814,525
Surrey	£1,738,108	£1,680,873	£1,627,792	£1,578,347
Sutton	£123,742	£119,668	£115,889	£112,368
Swindon	£421,273	£407,401	£394,535	£382,551
Tameside	£799,561	£773,232	£748,814	£726,068
Telford	£924,509	£894,065	£865,831	£839,531
Thurrock	£320,565	£310,009	£300,219	£291,100
Torbay	£472,331	£456,778	£442,353	£428,916
Tower Hamlets	£422,800	£408,878	£395,965	£383,938
Trafford	£397,900	£384,798	£372,646	£361,327
Wakefield	£926,900	£896,378	£868,070	£841,703
Walsall	£890,225	£860,911	£833,723	£808,399
Waltham Forest	£1,210,036	£1,170,191	£1,133,236	£1,098,814
Wandsworth	£279,651	£270,442	£261,902	£253,947
Warrington	£580,291	£561,183	£543,461	£526,953
Warwickshire	£1,929,059	£1,865,536	£1,806,623	£1,751,747
West Berkshire	£444,463	£429,827	£416,253	£403,609
West Sussex	£4,745,060	£4,588,809	£4,443,895	£4,308,911
Westminster	£326,752	£315,993	£306,014	£296,718
Wigan	£1,603,583	£1,550,778	£1,501,805	£1,456,187
Wiltshire	£1,190,530	£1,151,327	£1,114,968	£1,081,101
Windsor	£124,076	£119,990	£116,201	£112,671
Wirral	£1,677,574	£1,622,333	£1,571,100	£1,523,377
Wokingham	£291,790	£282,182	£273,270	£264,970
Wolverhampton	£1,044,812	£1,010,407	£978,499	£948,777
Worcestershire	£3,115,042	£3,012,466	£2,917,332	£2,828,718
Total	£176,856,300	£171,032,551	£165,631,360	£160,600,281

Annex C – Equalities Statement

1. Name of Directorate
Local Government Finance, Department for Communities and Local Government
2. Please list all the policy streams in your business area.
This draft equality statement covers the Government's proposed value of the 'Former ILF Recipient Grant' and the methodology in calculating local authority allocations.
3. Identify any policy streams aimed at or impacting upon persons who share a protected characteristic.
<p>On 6 March 2014 the Government published the Equality Analysis of the 'Closure of the Independent Living Fund'⁵. This Equality Statement only assesses the potential impact on protected groups from the proposed value and new distribution methodology for the 'Former ILF Recipient Grant'.</p> <p><u>Value</u></p> <p>Unlike in 2015-16, where funding paid to local authorities was based on actual remaining financial commitments to former ILF users, the proposal for funding being made available for the rest of the parliament has been calculated using an ILF Trust financial model. The model uses expenditure trends, based on financial data over several years, to estimate the cost of maintaining in full the care packages of former ILF users. This is done in each year of the parliament, for England as a whole.</p> <p><u>Distribution</u></p> <p>As the financial model cannot assess the cost at a local level, the Government proposes to distribute the funding by applying the 2015-16 distribution to the new grant total for each year of the Parliament. This will ensure the link between ILF client numbers in individual councils at the time of the fund's closure reflects the allocation that they receive in future years.</p> <p>As funding will continue to be unhypothecated there is no way of assessing whether local authorities will use the funding to maintain care packages in full. However, the Government is committed to ensuring that funding is provided at a level where the choice to do so is made by the council.</p>
4. Who has responsibility for developing these policies?
Matthew Style, Director, Local Government Finance, Department for Communities and Local Government (DCLG).

⁵ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/287236/closure-of-ilf-equality-analysis.pdf

5. Are there any EU or other statutory regulations that need to be adhered to regarding equalities?

In exercising his functions the Secretary of State is subject to the public sector equality duty in section 149 of the Equality Act 2010.

The duty on the Secretary of State pursuant to section 149 of the Equality Act 2010 when exercising the functions referred to above and other functions is to have due regard to the need to (as set out in section 149(1))—

- (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010;
- (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and
- (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

Section 149(1)(b) involves the Secretary of State having due regard, in particular, to the need to—

- (a) remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic;
- (b) take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it; and
- (c) encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.

Section 149(1)(c) involves the Secretary of State having due regard, in particular, to the need to—

- (a) tackle prejudice; and
- (b) promote understanding.

The protected characteristics for the purposes of s.149(1)(a) of the duty are age; disability, gender reassignment; race; religion or belief; sex; sexual orientation; and marriage and civil partnership, pregnancy and maternity.

The relevant protected characteristics for the purposes of s.149(1)(b) and (c) of the duty are age; disability; gender reassignment; pregnancy and maternity; race; religion or belief; sex; and sexual orientation.

<p>6. What published or otherwise public sources have you drawn upon when developing policies?</p>
<p>Sources of evidence include:</p> <ul style="list-style-type: none"> • Closure of the Independent Living Fund (ILF) Equality Analysis (Published 06/03/2014)
<p>7. Have you identified differences in need for those with a protected characteristic or evidence of an adverse equality impact on those with a protected characteristic?</p> <p>What actions have you taken to mitigate any adverse equality impact on those with a protected characteristic?</p>
<p>All previous recipients of the ILF were considered to be disabled people because eligibility to receive ILF funding was dependent upon an entitlement to a higher rate of Disability Living Allowance or the Enhanced Rate of Dailey Living Component of Personal Independence Payment. The distribution of the Former ILF Recipient Grant funding could impact directly upon such persons.</p> <p>The Closure of the Independent Living Fund (ILF) Equality Analysis concluded that there was no evidence that the closure would have a disproportionate impact on gender, race/ethnicity or age or upon other protected characteristics. As our proposals for distribution relate to expenditure patterns at the time of the ILF closure we consider therefore that the distribution of the Former ILF Recipient Grant should also not have a disproportionate impact upon other protected characteristics.</p> <p>The closure of the ILF in 2015 and subsequent devolving of funding to local authorities in England has meant that all users at the time of closure now have their needs assessed and met through the mainstream care and support system. This allows local authorities to use all the available funding to support every user of the social care system in a fair and consistent way.</p> <p>It is for individual authorities to make decisions on allocation of their resources. This grant, as in 2015-16, is un-hypothecated and therefore it is not possible to assess how local authorities use the funds. It is therefore not possible to predict how the proposed changes for 2016-17 will impact on specific persons who share the protected characteristic of disability as this will be dependent on the decisions made at a local level.</p> <p>In exercising their functions, including when making policy and spending decisions, authorities are required to comply with the public sector equality duty. So in deciding whether or not to fund, or continue to fund, a service that (for example) offers opportunities to persons who share the protected characteristic of disability, the authority has a duty to assess the associated equalities impacts, including having due regard to the need to advance equality of opportunity between those who are disabled and those who are not.</p>

Mitigations

The approach taken in valuing the grant has been to remain in line with the previous Government's commitment to fund local authorities based on expenditure patterns at the time of the ILF's closure. With no user data collected since the closure however, the Government has used an ILF Trust model to assess the full cost of maintaining former ILF support packages in full. While there may be some local variation, at a national level it is likely that the funding being provided will be at the least sufficient to fund the full cost of supporting former ILF users existing care packages if the council wishes to do so. A full break down of the model's assumptions and calculations can be found within the technical consultation.

8. When your policies are finally implemented which groups are most likely to benefit?

As was the case at the time of the ILF's closure there is a potential positive impact for some users of the social care system from this funding being made available. Those who are not former ILF users may get an improved service or level of funding from their local authority due to the greater amount of funding available.

9. In considering the above information have any gaps in data or equalities information been identified?

The devolved nature of local government in England, including the unhypothecated nature of the funding, does not lend itself to predicting changes in service provision and, therefore, equalities impacts. As a result DCLG lacks reliable data and information on the impact of the proposals on specific persons who share a protected characteristic.

Through the 'Former ILF Recipient Grant' consultation we are seeking views on whether our proposed distribution should continue to be in line with practices set out at the time of the Fund's closure. Due to the nature of the funding – it is likely that any representations we receive during the consultation period will bring to light any equalities impacts that the Government has not yet considered.

10. Overall, can you make an assessment of the potential of this policy to have a substantial equalities impact on discrimination, fostering good relations or advancing equality of opportunity?

The changes in funding could, depending on the spending decisions made by authorities, have an adverse equalities impact on persons who share the protected characteristic of disability. At this stage, however, there is not sufficient evidence to identify a 'substantial' equalities impact. The policy stream relates to the allocation of unhypothecated funding. The proposals have been designed in the context previous decisions made by Government on how to devolve funding to councils for their duties under the Care Act 2014.

The extent of equalities impact will also depend on the decisions made by authorities in response to a number of central and local policies. As noted in section 7 above, each local authority has a duty to assess the equalities impacts of their service provision choices.

This analysis was undertaken by (name of Equality Champion and any other colleagues involved).

Name/Title	Lorenzo Peri		
Directorate/Unit	LGF	Lead contact	Lorenzo Peri
Date	2 February 2016	Date	2 February 2016

SCS Sign off

MATTHEW STYLE

I have read the available evidence and I am satisfied that this demonstrates compliance, where relevant, with Section 149 of the Equality Act and that due regard has been given to the need to: eliminate unlawful discrimination; advance equality of opportunity; and foster good relations.

About this consultation

This consultation document and consultation process have been planned to adhere to the Consultation Principles issued by the Cabinet Office.

Representative groups are asked to give a summary of the people and organisations they represent, and where relevant who else they have consulted in reaching their conclusions when they respond.

Information provided in response to this consultation, including personal information, may be published or disclosed in accordance with the access to information regimes (these are primarily the Freedom of Information Act 2000 (FOIA), the Data Protection Act 1998 (DPA) and the Environmental Information Regulations 2004).

If you want the information that you provide to be treated as confidential, please be aware that, under the FOIA, there is a statutory Code of Practice with which public authorities must comply and which deals, amongst other things, with obligations of confidence. In view of this it would be helpful if you could explain to us why you regard the information you have provided as confidential. If we receive a request for disclosure of the information we will take full account of your explanation, but we cannot give an assurance that confidentiality can be maintained in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on the Department.

The Department for Communities and Local Government will process your personal data in accordance with DPA and in the majority of circumstances this will mean that your personal data will not be disclosed to third parties.
Individual responses will not be acknowledged unless specifically requested.

Your opinions are valuable to us. Thank you for taking the time to read this document and respond.

Are you satisfied that this consultation has followed the Consultation Principles? If not or you have any other observations about how we can improve the process please contact DCLG Consultation Co-ordinator.

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