

Case study – Direct Payment Auditing - Richmond Council

Introduction

Administering DPs well is a tricky business. Striking the right balance between accounting for public money and making sure that people can use DPs flexibly with minimum hassle takes effort to get right.

It's important because evidence suggests that getting it right can pay huge dividends. People taking a personal budget as a DP tend to get significantly better outcomes than people using managed budgets. In addition, enabling people to be creative in how they use their DPs improves their cost effectiveness, as well as encouraging more people to take up a DP in the first place.

In attempting to get the right balance, particularly around auditing DPs, it's important to be mindful that those setting the rules have different priorities to people who receive a DP. Council employees tend to have the job of protecting or accounting for public money, people who use services just want to get on with their life:

'Most people going to any meetings about finance are fearful and pessimistic, whether that's about developing a support plan setting up a DP card or whatever. We, as users, tend to go into meetings with the council expecting the worst. I'm not predisposed to understand how the system works I'd rather that the system should be as idiot friendly as possible' - Tim, a DP recipient from Richmond.

Background information

Richmond Council has a strong track record in delivering DPs and a vibrant third and user led sector who work closely with the council to help ensure that DPs are simple and easy to use. Keeping the audit trail simple is seen as a crucial part of making DPs accessible, so the renewed emphasis on a light touch approach to monitoring DPs in the Care Act resonates well with the approach Richmond have evolved. For example the Care Act Guidance says:

'For DPs to have the maximum impact, the processes involved in administering and monitoring the payment should incorporate the minimal elements to allow the local authority to fulfil its statutory responsibilities. These processes MUST NOT restrict choice or stifle innovation and MUST NOT place undue burdens on people to provide information to the Local Authority (Care Act Guidance 12.5 emphasis in original)

The numbers of people receiving DPs in Richmond have exceeded 30% for over four years which means that the light touch approach to monitoring them

has been tested on a significant number of people over this period of time.

In a time of acute financial pressure it's not hard to see how councils may be tempted to scrutinize how people spend their DPs rather than whether people are meeting their outcomes. When budgets have been pressured in the past many councils have looked to try and restrict what money is spent on, and try account for every penny spent. The problem with such an approach now is that it not only undermines the spirit of DPs but it would also not be compliant with the Care Act Guidance (clause 12.24):

The reporting system should not clash with the policy intention of DPs to encourage greater autonomy, flexibility and innovation. For example, people should not be requested to duplicate information or have onerous monitoring requirements placed upon them.

In encouraging people to be creative with DPs and keeping the monitoring light touch and proportionate, Richmond Council believe they have a robust approach and one which actually improves cost effectiveness as well as maximizing the potential of DPs to meet people's outcomes.

What underpins Richmond's approach?

'There is a commonly accepted idea here [in Richmond] that says it is important to encourage and support someone to use their money innovatively and flexibly. If you don't then you're not going to get value for money, and in fact that's the only way to ensure value for money. If we don't enable people to at least spend some of the money flexibly, potentially it's disabling for people. In the end this costs everyone more money as well as reducing the life chances for the person'. (Gill Ford, Head of Performance and Quality Assurance for London Borough of Richmond upon Thames).

The emphasis in Richmond is on developing a trusting relationship with people using DPs and driving towards the minimum requirement for gathering information. This reflects Care Act Guidance which states that councils 'must not require information to be provided more often and in more detail than is reasonably required for the purpose of enabling the authority to know that making direct payment is still an appropriate way of meeting the needs, and that conditions upon which it is made are met. (Care Act Guidance 12.24)

How did the approach develop?

Richmond Council made efforts to involve a wide range of stakeholders from the outset in developing their approach to auditing DPs. This enabled the local DP support scheme to be involved in developing the right kind of support for people to manage their DPs as well as giving people with support needs an opportunity to co-design the process.

'We started by having conversations with local disability groups, our staff and people using services about what level of information was useful to be kept and also to be requested by the council. Our view was that we [the council] were really just interested in having a summary of key information about purchases made. The local disability organisations were closely involved and developed a local way for people to keep detailed records of everything they spend if they wanted to. However, the Council's position is 'keep that level of information if you feel it is necessary, but all we [the council] require is just summary information' (Gill Ford, Head of Performance and Quality Assurance for Richmond Council)

This collaborative approach is considered an ongoing commitment so when prepaid cards were introduced recently as an option to further simplify the process of setting up and managing a DP, a similar process took place. This brought people with support needs, carers and user led groups together to design the system. Tim, who manages a DP for his wife Patti, describes his experience of how that worked: *'The council organised a number of users to come along and have a process review every couple of months which worked very well. The very early feedback we gave, almost en-masse, was 'don't make me have to account for every 50p! Just give me a certain amount every month that I can spend as I see fit'. So they took that back and now the line for accounting is not at the minute level but at the fairly substantial stage. So if you spend 50p on a bus ride then so be it, but if you spend a hundred 50ps on bus rides then you may have to account for it'.*

How does the process work?

People are asked to complete a summary sheet as part of their review, which gives an overview of how they have used their money to meet the outcomes identified in their support plan. Gill describes what a typical summary sheet might contain:

'It might say something like: I spent money mainly on my personal assistant (PA), maybe accessing a range of activities, enrolling on a course maybe buying a computer - something like that.'

The summary record is uploaded onto the council's IT system and shared between staff working with the individual and the finance team. People submit these returns along with their bank statements if they have a dedicated account but with prepaid cards the statements are automatically visible to the council so people don't have to remember to do this.

The Finance team in Richmond have a dedicated resource to support social

workers in ensuring people are able to use their DP effectively. Moreover, frontline staff are expected to be literate in having conversations with people about managing their money and in going through documents that describe in words and numbers how people have used the money to meet their outcomes. This means that social workers are expected to understand basic financial information and ask questions and challenge where necessary as part of a review but they are not expected to carry this responsibility alone. Gill says:

'The Finance team are there as a flag to check to see if there's anything that they think may be of concern and if they think there is, its passed on to the social worker who then arranges a discussion with the DP recipient. They use the summary sheet as a basis for the discussion. Where there are complexities with the money sometimes joint visits take place so the social worker can take along a finance colleague who is easier with figures if they find that difficult. It doesn't happen a lot but it is something we encourage so that figures don't become an impediment to talking about how well things are working.'

What happens when it goes wrong?

The emphasis, Gill explains, is always on trying to provide the right level of support to put people back in control:

'We have had some cases of misuse but in all of those cases we try to understand what went wrong whatever it is and see how we can prevent that from happening again'.

Where concerns remain, reviews can be brought forward and the level of information requested may be increased. An easy first step might be to recommend a prepaid card if people don't already have one. The local DP support service also offer managed DP accounts which can work well for some.

'We will take the DP away if really necessary - if the person will not or cannot use the money to meet their needs and where the needs still need to be met but usually a managed DP is a better option so that the flexibility remains with the person.' Gill Ford

Solution

- The process Richmond Council have developed is Care Act compliant and reflects best practice in a number of ways -
- There is a common acceptance across the council that in order for DPs to be effective and offer value for money, people must be enabled to use them creatively and flexibly

- The approach to monitoring DPs has been co-produced and is kept under regular review to ensure practice doesn't veer from the policy objective to promote choice and flexibility
- There is a minimum amount of information people are asked to keep and submit which focuses primarily on whether outcomes have been met not on how they have been met
- There is independent and peer support for people to understand their responsibilities and to complete their returns
- Prepaid cards are offered as an option. They help reduce bureaucracy and people using prepaid cards are not restricted in their choice of providers. Cards can also be used to make cash withdrawals
- Dedicated finance support helps frontline staff have good conversations with people about how they are managing their money and acts as a flag to prompt reviews if things are not going well
- Where things do go wrong, the default approach is to understand what went wrong and use the learning and to find a way to maintain the flexibility and control people have over meeting their needs. Prepaid cards and Managed DPs are both options which may help strike a better balance for some people who struggle to manage a DP