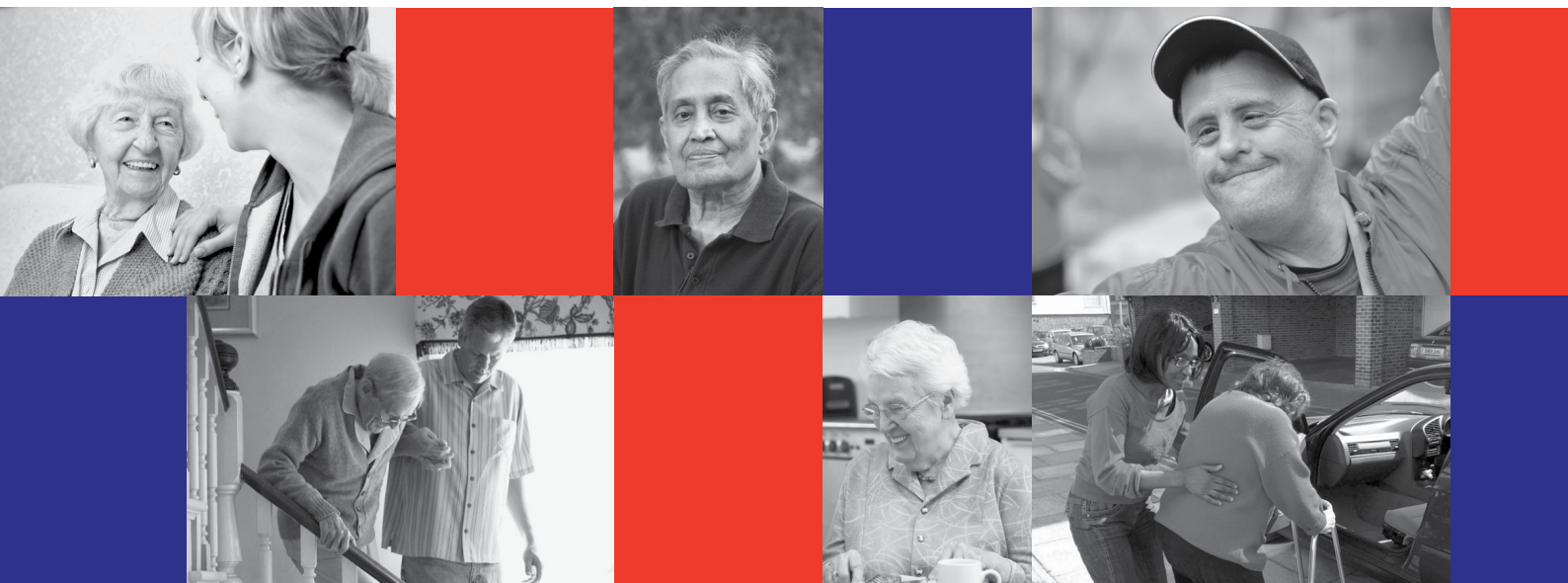


The Homecare Deficit

A report on the funding of older people's homecare across the United Kingdom

Version 1 | March 2015



About UKHCA

United Kingdom Homecare Association (UKHCA) is the national professional and representative association for organisations who provide care, including nursing care, to people in their own homes.

Our mission, as a member-led professional association, is to promote high quality, sustainable care services so that people can continue to live at home and in their local community. We do this by campaigning, and through leadership and support to social care providers.

For more information please see www.ukhca.co.uk

Introduction

This report reveals the extent of the deficit in funding for homecare services for older people across the United Kingdom and exposes the level of risk that councils place on a system intended to support elderly and disabled people, who should rightly expect their care needs to be properly supported.

The rates that so many councils are paying independent and voluntary homecare providers illustrate the root cause of the unacceptably low pay and conditions of the homecare workforce, and genuine risks of underpayment of National Minimum Wage.

The inability (or unwillingness) of central Government to hold local commissioners to account on this issue, makes them complicit in a systemic failure, which requires urgent action.

In addition to supplying the evidence, we make recommendations for action on page 9.

Disclaimer and Caution

This report contains data supplied under Freedom of Information legislation by local authorities and health and social care Trusts in Northern Ireland. Where data from councils was missing we provided estimates (where possible) and used data obtained from third parties (see page 54).

The rates provided in this report have not been independently verified. While every effort has been taken to reduce errors and omissions this data should not be used by care providers as an alternative to the accurate pricing of individual tender bids, nor by councils or other purchasers to set maximum prices in contracts.

UKHCA accepts no responsibility for actions taken or refrained from solely by reference to the contents of this report.

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Homecare in the United Kingdom

Over 500,000 people each week across the UK receive social care services in their own home (homecare), supporting them to live independently within their local community.

Increasing attention is being paid to whether homecare services are sufficiently funded to be economically viable, and whether the homecare workforce are properly rewarded for the valuable work they undertake.

At least 70% of all homecare is purchased by the state, mostly by local councils, and by health and social care trusts in Northern Ireland.

This report provides a snapshot of the rates paid for older people’s homecare during a sample week in September 2014, using data obtained from Freedom of Information requests to 211 public bodies. The methodology is described on page 48.

We have confined our enquiry to the care for older people, partly because services for this group make up the bulk of many independent and voluntary sector providers’ work, and because services for younger adults often attract significantly higher rates, which may mask the reality of the underfunding of older people’s care when these prices are included.

Average price paid for homecare for older people

The weighted average price¹ for an hour of homecare for older people in a sample week during September 2014 was as follows:

- United Kingdom: £13.66 / hour
- England: £13.77 / hour
- Wales: £14.28 / hour
- Scotland: £13.68 / hour
- Northern Ireland: £11.35 / hour

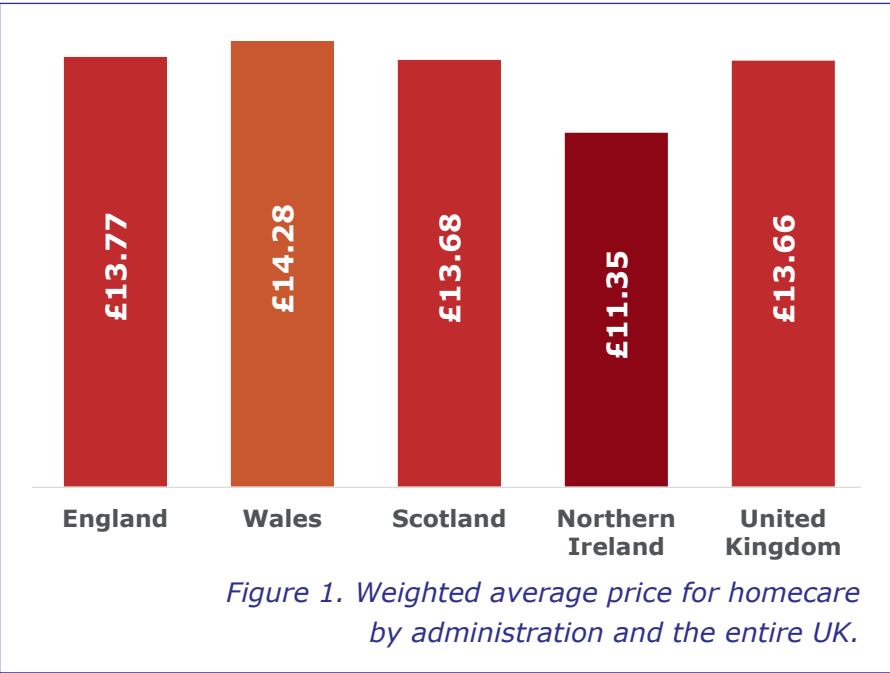
The National Minimum Wage

Only 28 councils (of the 203 where we could establish an average price) were paying their local providers an average

of £15.74 per hour, the rate UKHCA estimates is necessary to comply with National Minimum Wage (including careworkers’ travel) and the costs of running the service in a sustainable way (see page 10).

Astonishingly, four authorities had an average price so low that it was unlikely to cover even the direct costs of employing homecare workers, which we estimate to be £11.01 per hour.

The rates paid by the majority of councils in the UK demonstrate the significant risk of non-compliance with National Minimum Wage within the homecare sector.



¹ We describe how weighted average is calculated on page 51.

Key findings (cont)

The UK and London Living Wages

Using a comparable calculation for the costs of payment for the UK Living Wage, we found just three councils where the average price, if correct, might enable providers servicing the needs of older people to pay a living wage.¹

In our view, none of the London boroughs were paying rates high enough to support the London Living Wage.

Where councils pay an unrealistic price while expecting a Living Wage they run the risk that their providers cease to be economically viable, or that areas such as training and care coordination are sacrificed to increase wages to the required rate. In reality the aspirations of such councils are little more than empty promises to local workers.

Risks associated with under-funded care

Low prices paid for homecare services carry a number of risks, including poor terms and conditions for the workforce, insufficient resources to organise the service and insufficient training for the complex work that supports the increasingly frail and disabled individuals who quality for state-funded support.

Without addressing this underfunding, the independent and voluntary sector will continue to struggle to recruit and retain careworkers with the right disposition, training and qualifications. Ultimately, the care market will become commercially unsustainable for the providers who deliver most of the homecare purchased by the state within the UK.

¹ Oxfordshire County Council, North Somerset Council and Inverclyde Council.

Recommendations

1. Officers and elected members of councils (and the boards of Northern Ireland's health and social care trusts) should compare the average prices their authority pays for homecare for older people with UKHCA's Minimum Price for Homecare of £15.74 per hour, as described on page 10 of this report.
2. Authorities and providers should enter into transparent, open-book, costing exercises to assess the actual costs of care in the local area, taking into account wage expectations of the local labour market and actual business costs.
3. Authorities must pay a rate which is *at least* consistent with National Minimum Wage and the full costs of running a homecare service, including a level of profit or surplus that enables providers to remain viable within a diverse and sustainable local homecare market.
4. Authorities which aspire to payment of the Living Wage or London Living Wage should factor these additional costs into the prices they pay their providers.
5. Authorities, through their national bodies, should be willing to work with UKHCA and our member organisations to understand the implications of under-funded homecare services.
6. Governments of all four UK administrations should take responsibility for holding commissioning bodies to account, by requiring statutory regulators to undertake effective oversight of the commissioning functions of councils and Trusts.
7. Providers are encouraged to bring this paper to the attention of their authority (or Trust) as the starting point for an open dialogue.
8. Governments in each UK administration must ensure that purchasing authorities have sufficient resources to pay the necessary fees to providers so that they can meet their legal and social responsibilities.

UKHCA's Minimum Price for Homecare

In February 2014, UKHCA first published "A Minimum Price for Homecare".¹

The assumptions, based on accurate knowledge of cost and provider experience, give a minimum price for an hour of homecare commissioned by local authorities that enables providers to meet their legal obligations, including the National Minimum Wage and the ability to run a sustainable business.

We do not suggest that UKHCA's Minimum Price adequately recognises the demanding tasks required of homecare workers; employers' ability to be competitive within their local employment market; nor the additional costs associated with providing care services to individuals who fund their own care. However, this minimum price does provide a measure against which local authority prices can be judged.

The prices used in UKHCA's calculations assumed that providers are paid solely by reference to careworkers' "contact time"² and that:

¹ Angel, C (2014) A Minimum Price For Homecare. Figures quoted in this paper relate to version 2.1 and use the 2014-15 figures for minimum wage and living wages. See www.ukhca.co.uk/downloads.aspx?ID=434.

² "Contact time" is the time the worker spends in a service user's home providing care. It is used extensively by councils for paying providers, and is therefore often used to calculate workers' wages.

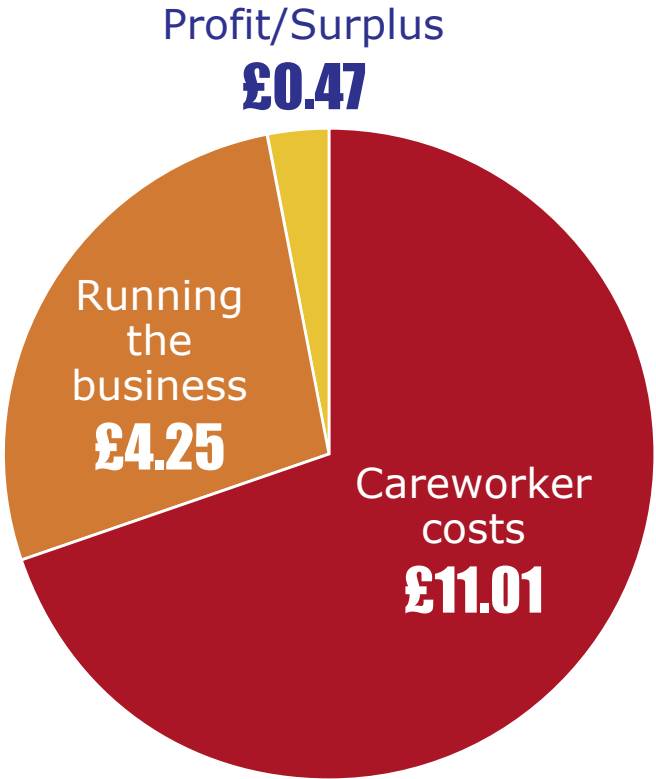


Figure 2: Distribution of costs (rounded to the nearest penny) in UKHCA's Minimum Price for Homecare of £15.74/hour.

- Workers are paid for "contact time" at the prevailing National Minimum Wage;
- All other "working time" (applicable travel time, supervision and training) are paid at the same rate;
- No enhanced rate is paid for unsocial hours, weekends or public holidays;
- Workers' business mileage is reimbursed at a reasonable rate;
- Workers receive full statutory paid holiday entitlements;
- Workers are enrolled in a Workplace Pension scheme;
- The care provider covers all reasonable operating costs;
- The provider achieves a profit/surplus that enables a sustainable business.

UKHCA's Minimum Price for Homecare

The assumptions used to calculate this price are summarised in figures 2 and 4 (on page 12).

Updated to take account of increases in the National Minimum Wage, the current "minimum price" is £15.74 per hour.

Just 28 authorities paid an average price at or above UKHCA's minimum price (14% of the 203 authorities where we could establish an average price), as shown in figure 3. We note that the prices paid in some of these councils are likely to reflect the travel time associated with very rural areas.

The costs of the careworkers' wages and on-costs come to £11.01 per hour.¹ Astonishingly, four authorities told us that they pay an average price below this figure: South Tyneside, Knowsley, Liverpool and the Western Health and Social Care Trust in Northern Ireland.

¹ £11.01 / hour covers wages for time providing care (without any enhancements for unsocial hours working); careworkers' travel time and mileage, the costs of statutory holiday pay, time spent while training; Employers' National Insurance contributions and pension contributions.

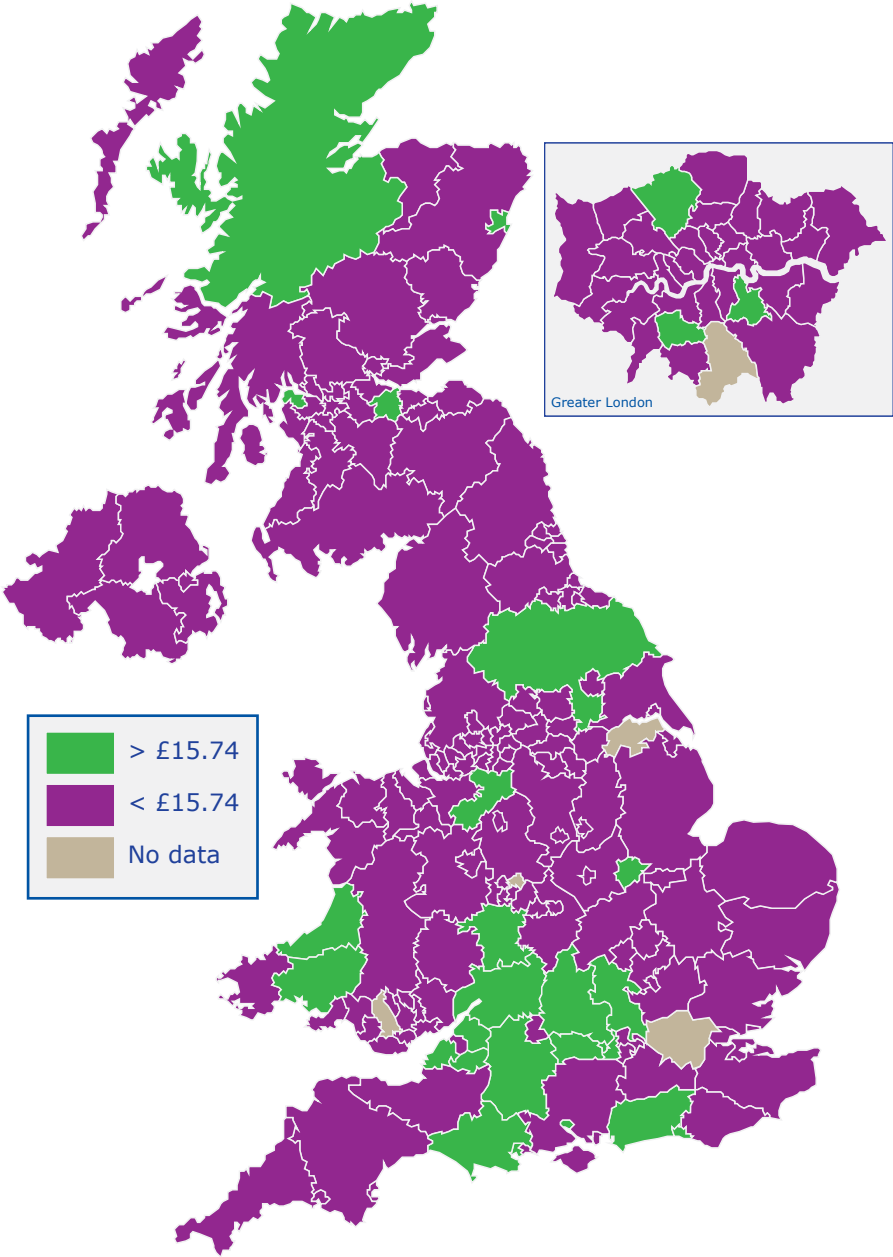


Figure 3: Councils paying an average above or below UKHCA's Minimum Price.

UKHCA's Minimum Price for Homecare

Calculation of UKHCA's Minimum Price for Homecare

Cost	Assumption	At NMW
Basic hourly rate for "contact time"	National Minimum Wage adult rate	£6.50
Enhancement for unsocial hours	None	£0.00
Travel time	11.4 minutes to 1 hr of contact time	£1.24
National Insurance	9.5% of gross pay	£0.73
Holiday pay	12.07% of gross pay	£0.93
Training & supervisory time	1.73% of gross pay	£0.13
Pension contributions	1% of gross pay	£0.08
Distance travelled	4 miles to 1 hr of contact time	£1.40
Mileage rate	£0.35 per mile	
Running the business (see below)	27% of total price	£4.25
Profit or surplus	3% of total price	£0.47
Total price (rounding to nearest penny)		£15.74

Figure 4: Assumptions based on prevailing costs and 2014-15 National Minimum Wage.

Providers' operating costs ("Running the business")

UKHCA's Minimum Price for Homecare includes reasonable operating costs, as follows:

- **Branch staff**, including the Registered Manager, supervisors, coordinators, finance and admin staff and quality assurance costs. In most cases, these will be the largest proportion of the operating costs.
- **Office costs**, including rent, rates, maintenance, water, lighting and heating, insurance, cleaning and equipment hire.
- **Training costs**, including delivering induction training, external training and obtaining qualifications.
- **Recruitment costs**, including recruitment advertising and criminal record disclosures;
- **IT equipment**, including computer systems, licenses, telephones and electronic call monitoring.
- **Marketing costs**, including advertising and promotional materials.
- **Consumables**, including uniforms and personal protective equipment.
- **Finance costs**, including bank charges, interest and depreciation.
- **Print, postage and stationery.**
- **Business travel**, including fuel, tax, insurance, vehicle leasing, repairs, mileage, accommodation and subsistence.
- **Legal and professional**, including legal fees, accountancy and registration fees.
- **General costs**, including donations, subscriptions, translation services, general expenses.

Rates paid for older people's homecare

The following sections present the results of UKHCA's Freedom of Information enquiries with councils and health and social care trusts at national, devolved and regional level in a sample week in September 2014.

The average price paid by an authority presents the most representative picture of the fees paid to independent and voluntary sector providers. We also give the lowest and highest rates paid by each authority, but note that in general terms the average price paid is much closer to the lowest price in the vast majority of cases.

We recommend that councils and their providers review these findings in relation to the adequacy of fees paid for homecare services in their local area, with specific reference to UKHCA's Minimum Price for Homecare, as described on page 10 of this report.

The four UK administrations

Government regions compared to the UK average

The weighted average price for older people’s homecare in the United Kingdom was £13.66 per hour.

Figure 5 shows the average price for each UK administration compared to the United Kingdom as a whole.

When the equivalent calculations are undertaken for each UK administration, the extremely low average price paid in Northern Ireland of £11.35 per hour becomes particularly apparent.

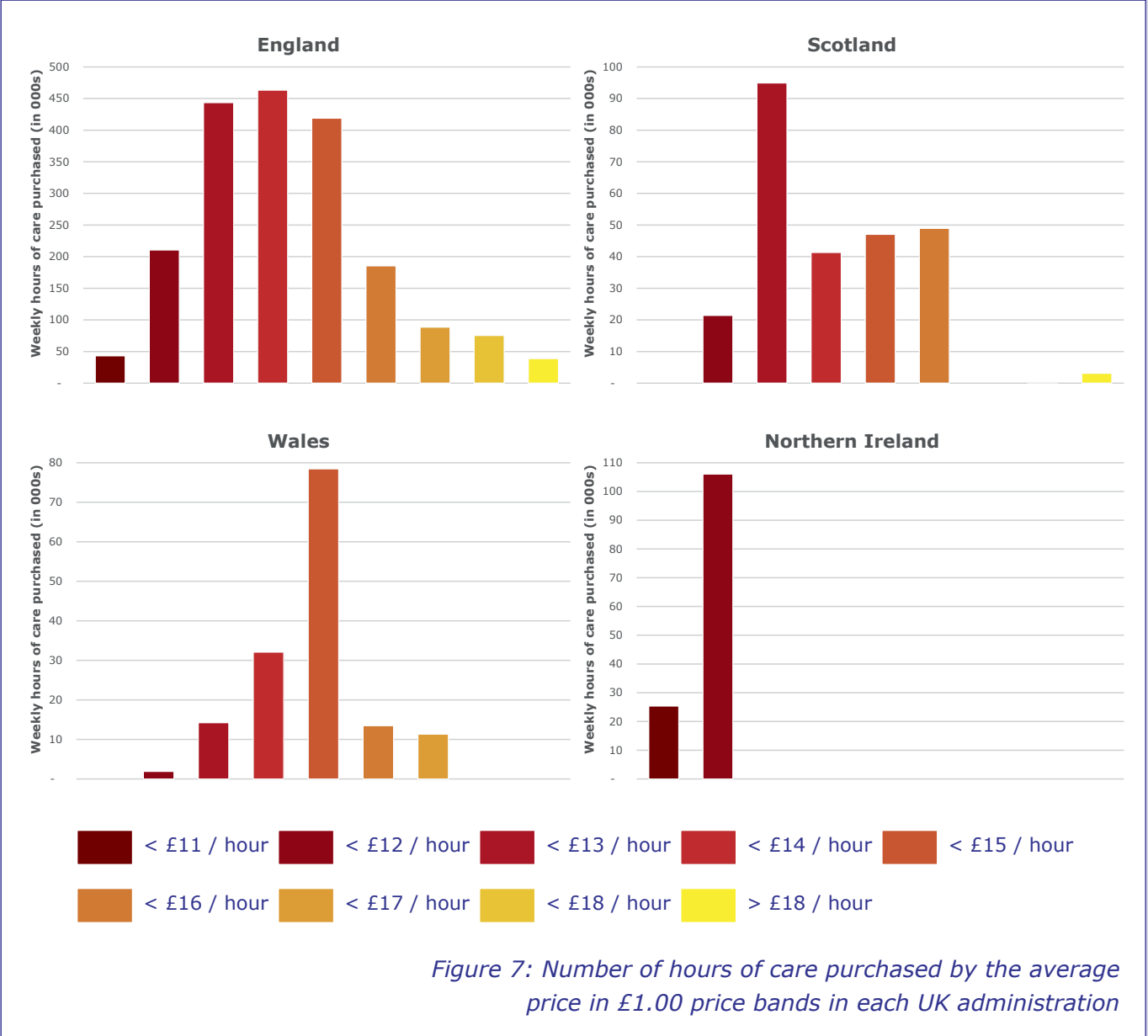
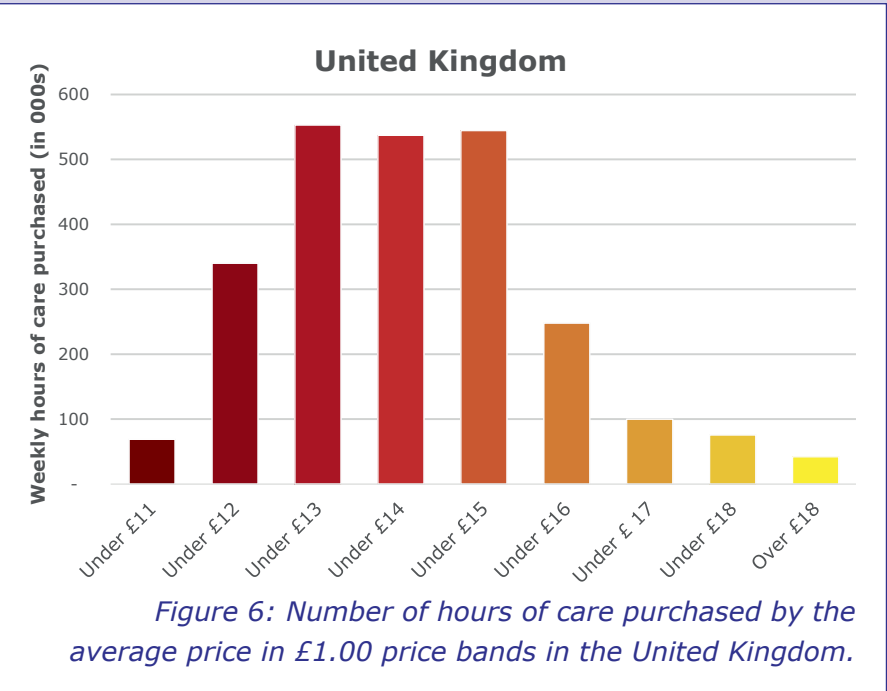
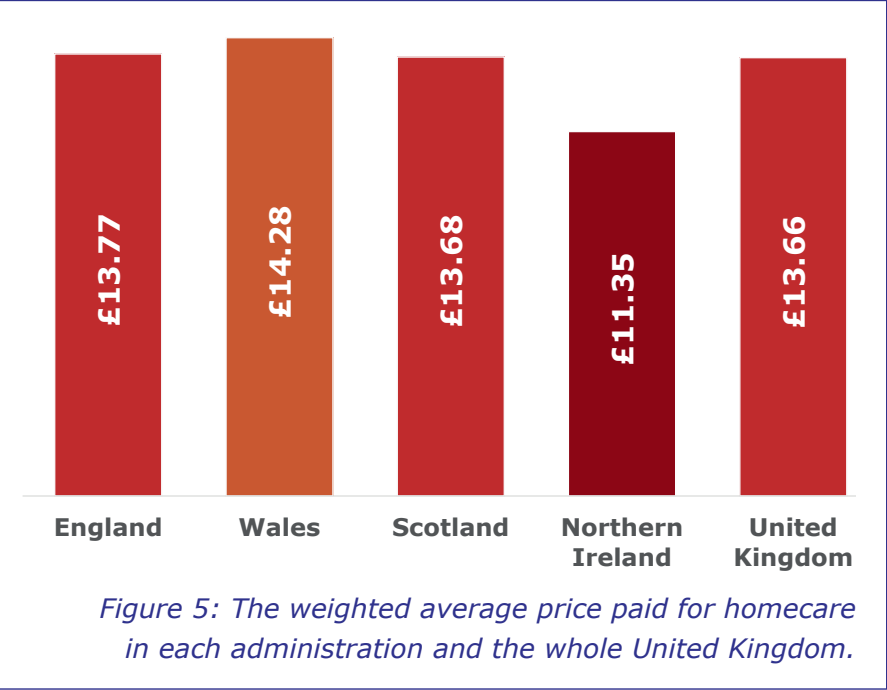
Number of hours purchased by price

While weighted averages provide useful headline figures, they hide the range of average prices paid by authorities.

Figure 6 illustrates the average prices in £1.00 price bands by the number of hours purchased by councils across the UK, showing the concentration of prices between £12.00 and £16.00 (see also Figure 10 on page 18, which

illustrates the data as a scatter diagram).

Figure 7 illustrates the distribution of average prices in each of the UK’s four administrations.



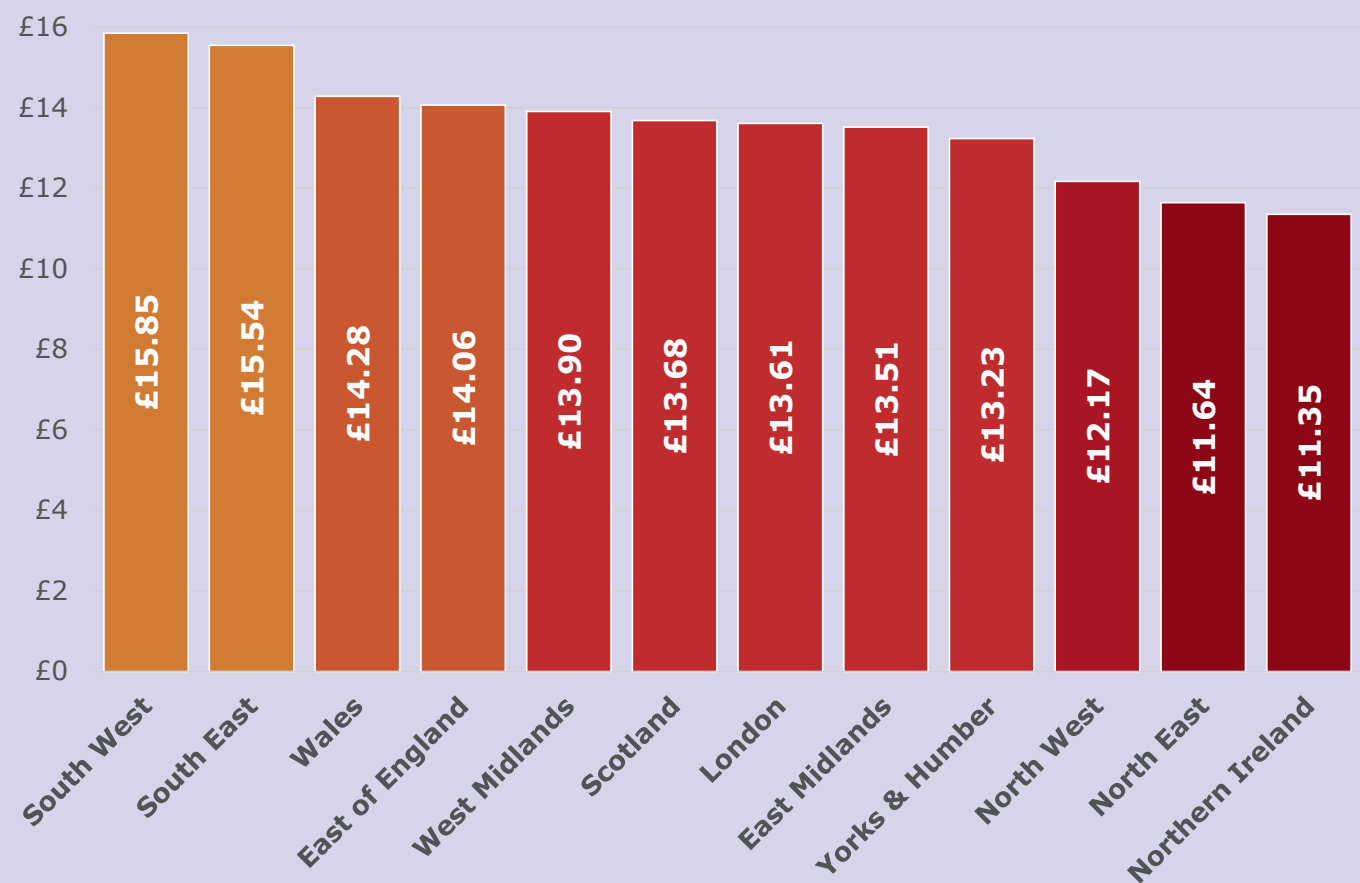
The data suggest that the average prices in England centre around £12-£16 per hour, with a much wider distribution of average prices than the other administrations.

A much higher proportion of hours in Scotland are around £13.00 per hour,

while in Wales average prices were below £15.00 per hour.

The extremely low average prices paid by Northern Ireland’s five health and social care Trusts are again particularly apparent.

The UK Government Regions



The average prices submitted by authorities in each of England's government regions and the devolved administrations are compared in figures 8 and 9.

Regions showing the lowest weighted average hour prices for homecare are Northern Ireland (£11.35) and the North East and North West of England (£11.64 and £12.17 respectively). These regions account for 29 of the 51 councils with the lowest average prices in the UK.

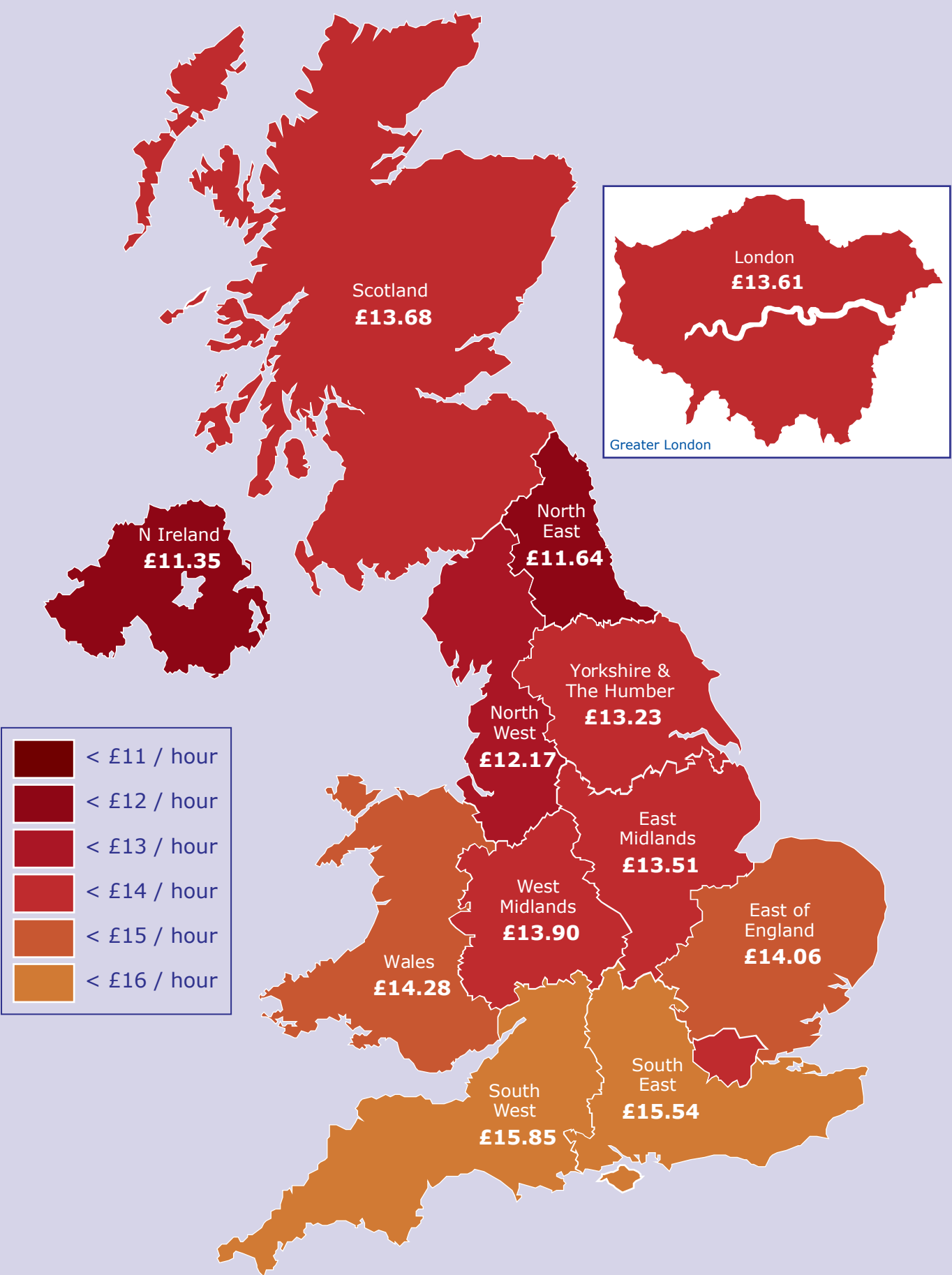
In general terms, the average prices across England's regions suggest a north-south divide, with average prices decreasing the further north one looks, with the exception of London (see page 36).

Figure 8. The weighted average price paid for care in each government region and the devolved administrations.

Region	Lowest hourly price in region	Weighted average hourly price	Highest hourly price in region
East Midlands	£10.98	£13.51	£24.10
East of England	£5.36	£14.06	£48.00
London	£8.75	£13.61	£65.00
North East	£9.10	£11.64	£18.80
North West	£9.00	£12.17	£16.30
South East	£9.56	£15.54	£44.27
South West	£10.20	£15.85	£40.00
West Midlands	£8.10	£13.90	£40.00
Yorks & Humber	£9.98	£13.23	£40.00
Wales	£9.16	£14.28	£42.01
Scotland	£10.10	£13.68	£27.72
Northern Ireland	£10.00	£11.35	£17.50

Figure 9. Range of prices paid in each region, with the weighted average price.

The UK Government Regions

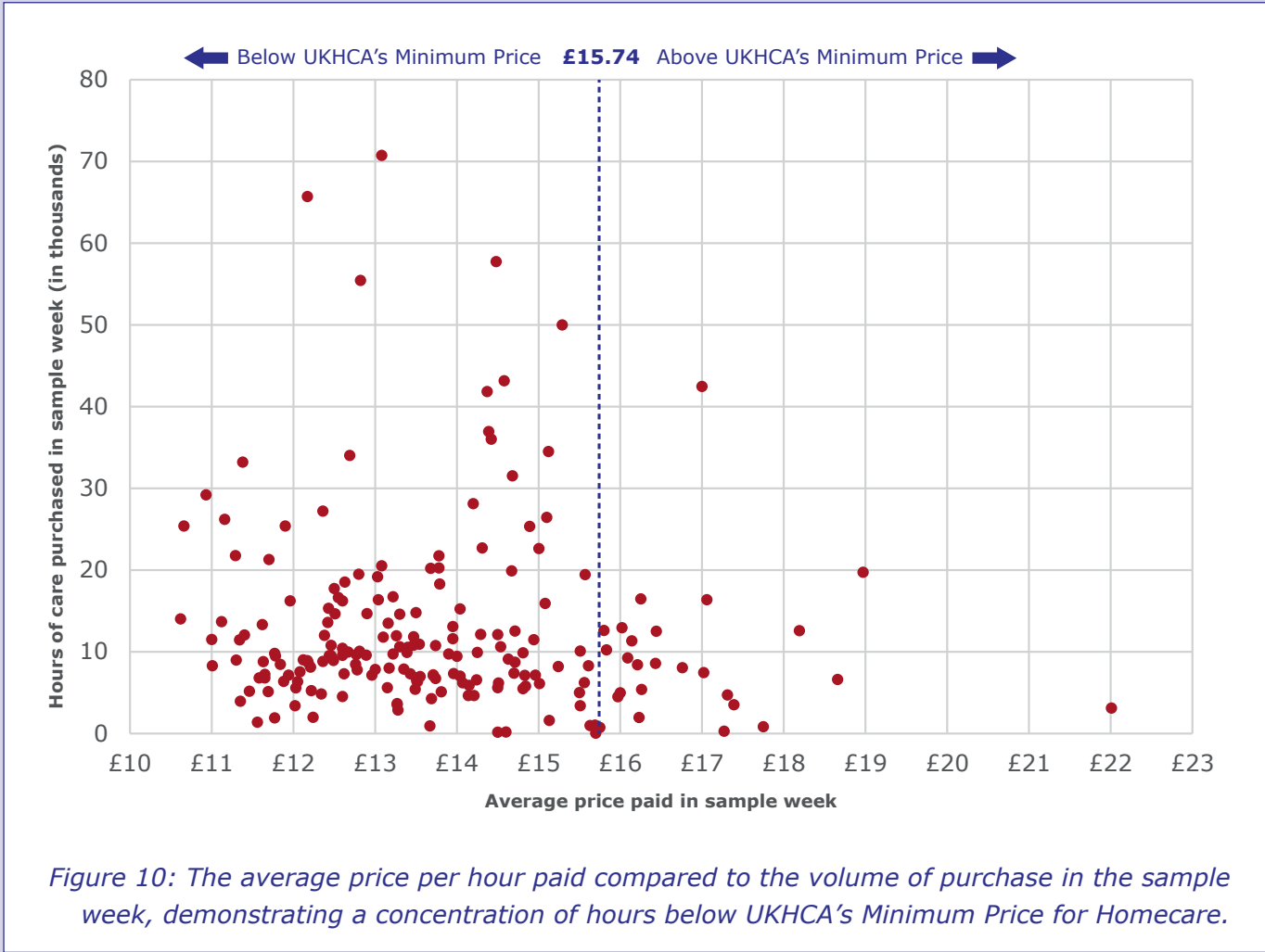


Councils and Health and Social Care Trusts

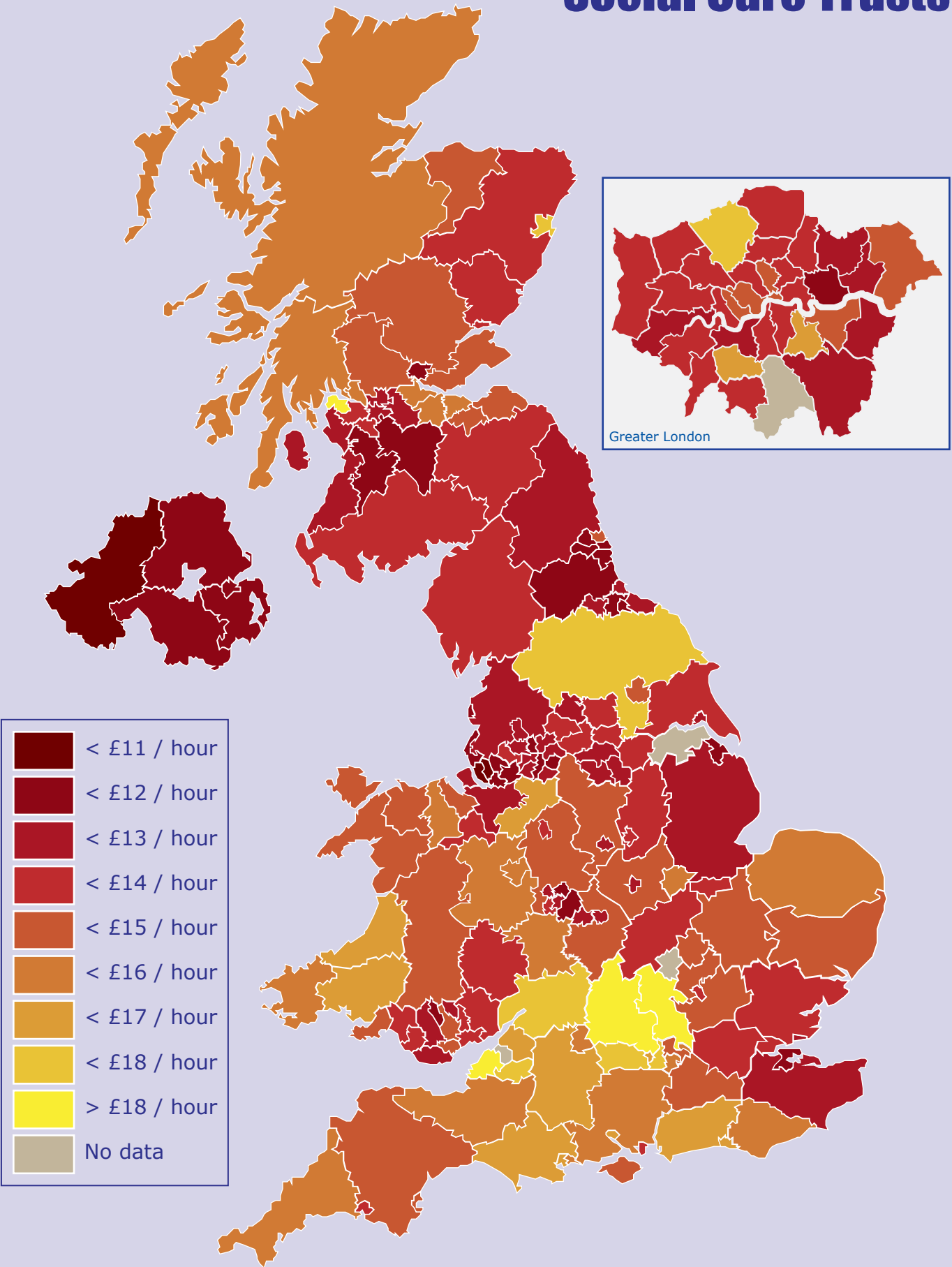
The average price of each council in the United Kingdom (and the Health and Social Care Trusts in Northern Ireland) is illustrated on page 19.

The scatter diagram in figure 10 plots the number of hours of care purchased by the average price in each authority.

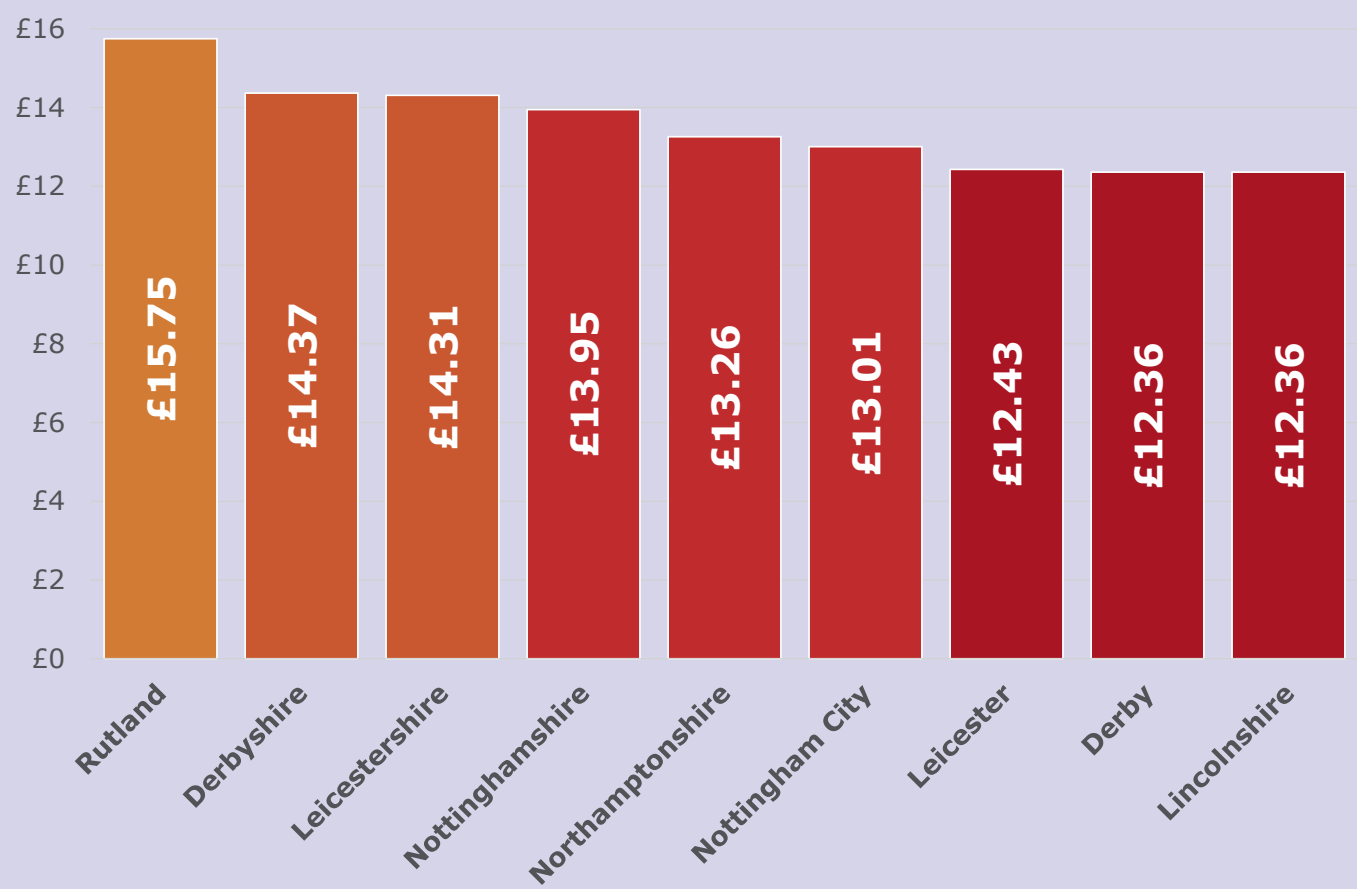
We note that a significant proportion of these hours fall below UKHCA's Minimum Price for Homecare of £15.74 per hour. The diagram also suggests that those councils purchasing the highest number of hours of care are almost entirely below this price.



Councils and Health and Social Care Trusts



East Midlands Region



The weighted average price for older people’s homecare in the East Midlands region was £13.51 per hour (or £13.48 if estimated data¹ and late submissions² are included in the calculations).

This weighted average price makes the East Midlands the fourth lowest region in England (page 16 provides an over-view of our regional findings).

Three councils in this region fall into the lowest quartile of all average prices

¹ We could not determine Derby City Council’s average price from their response and our calculations on average price uses the weekday day-time rate supplied.

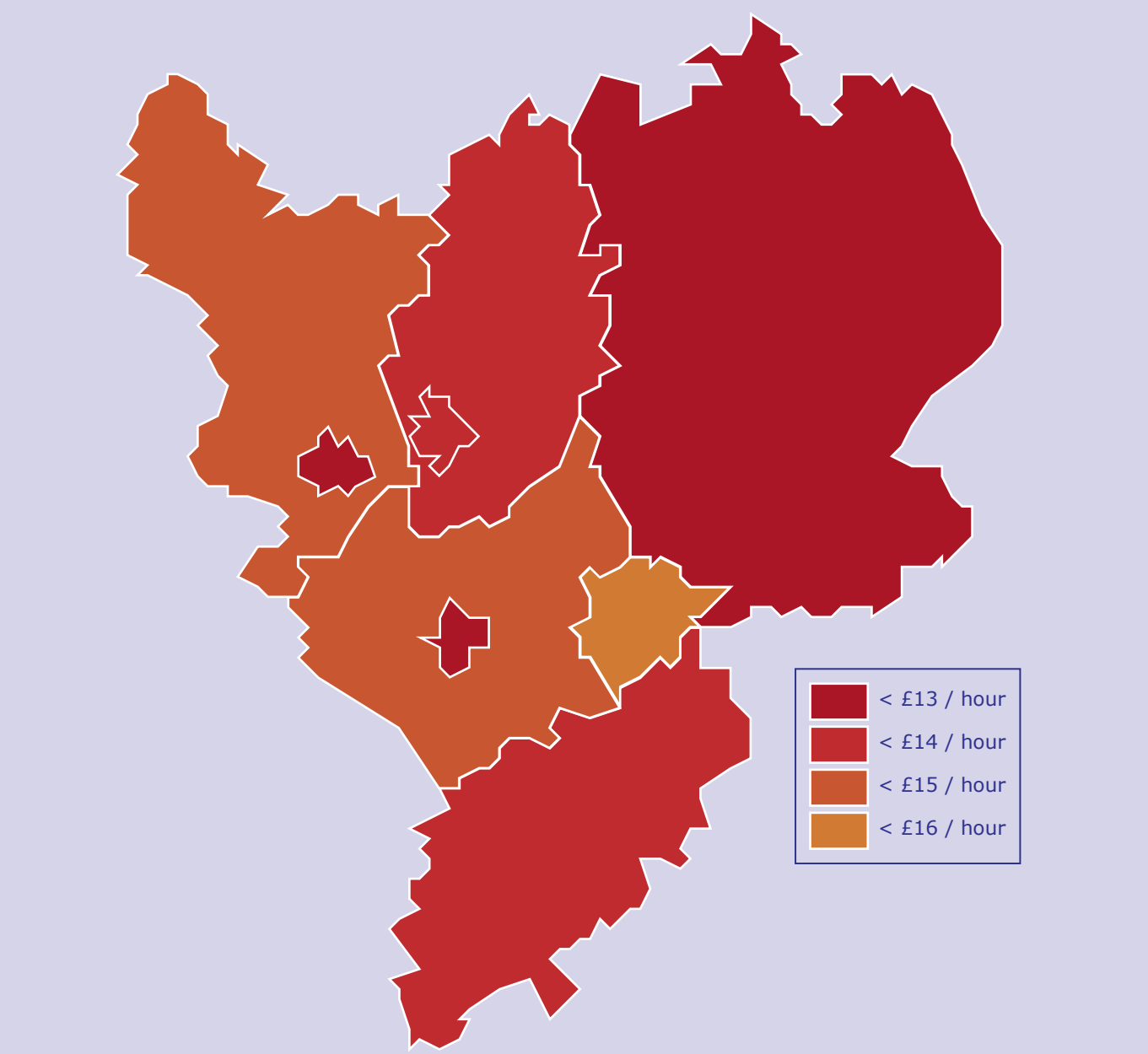
² Nottingham City Council originally withheld information about prices on the grounds of commercial sensitivity. The authority subsequently released figures 57 working days after our original request, once the majority of this report had been produced.

paid in the UK: Lincolnshire (the lowest average price in the region at £12.36); Derby City (whose estimated figure was difficult to establish, but likely to be only marginally higher); and Leicester City (with an average of £12.43).

Given the possibility of high careworkers’ travel times in Lincolnshire, the low average price in the region should be particular cause for concern.

Only one council, Rutland, paid an average price above UKHCA’s Minimum Price for Homecare, exceeding our rate of £15.74 / hour by a penny (see page 10) and we note that the very low hours of care purchased in the sample week make little difference to the average price in the region.

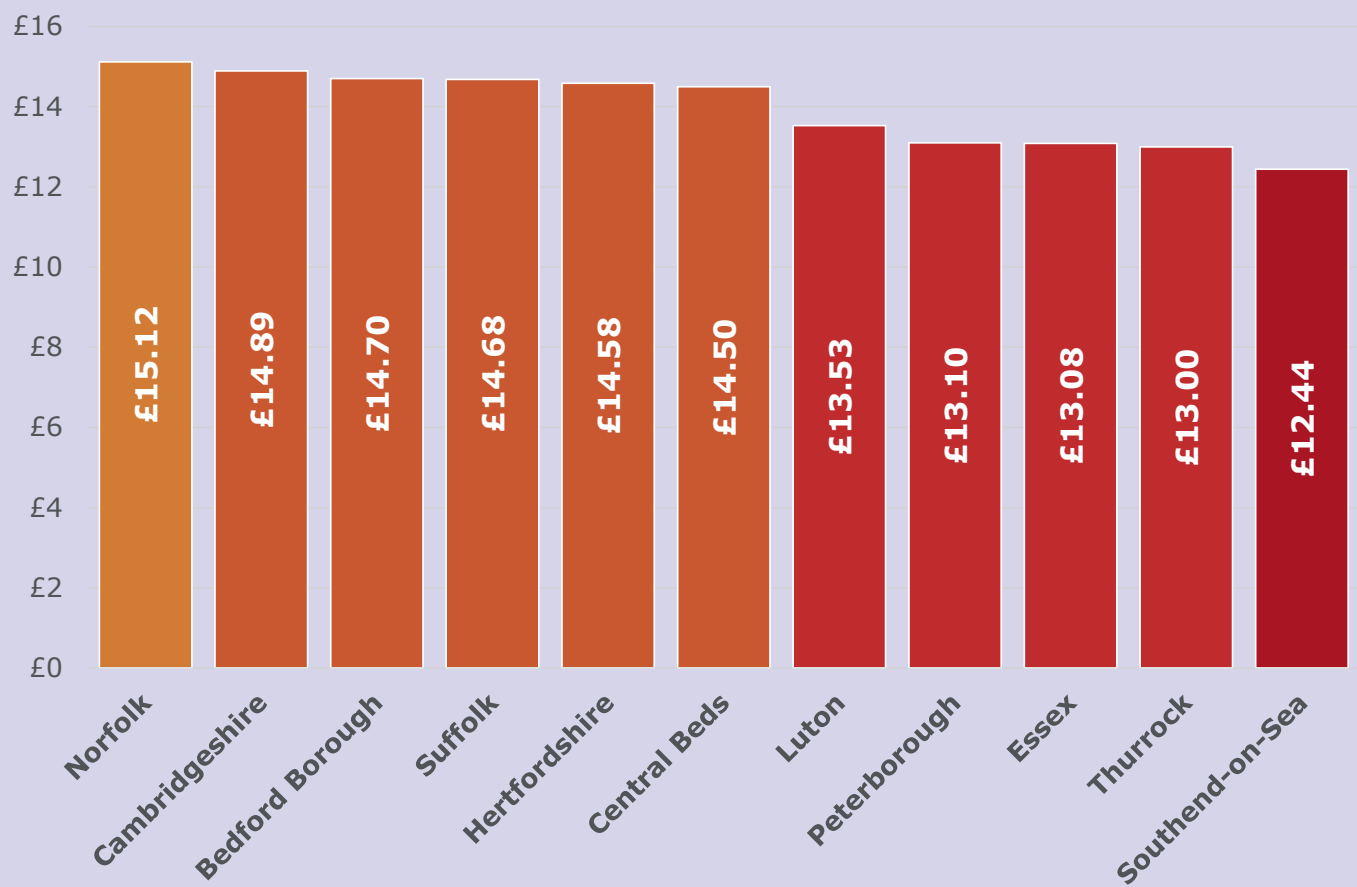
East Midlands Region



Authority	Lowest Price	Average Price	Highest Price	Hours of care
Derby City	£12.36	c. £12.36	£13.68	c. 8,806
Derbyshire	£12.86	£14.37	£14.71	41,835
Leicester City	£11.75	£12.43	£12.95	15,303
Leicestershire	£12.09	£14.31	£16.64	22,694
Lincolnshire	£10.98	£12.36	£24.10	27,208
Northamptonshire	£12.28	£13.26	£15.00	11,963
Nottingham city (late response)	£12.50	£13.01	£13.20	9,474
Nottinghamshire	£12.75	£13.95	£17.17	13,086
Rutland	£15.75	£15.75	£15.75	721

Please see “Disclaimer and Caution” on page 4 in relation to these figures.

East of England Region



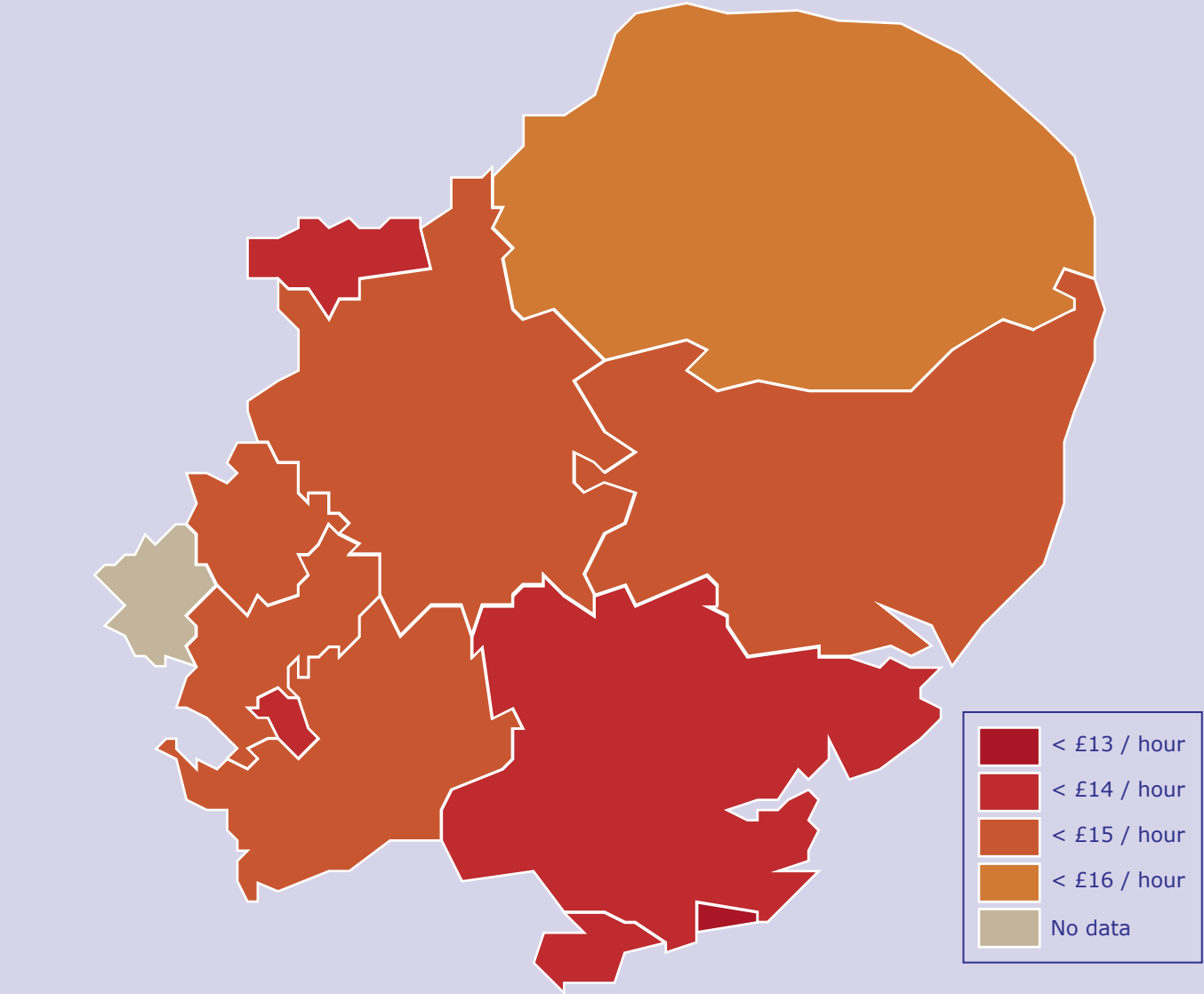
The weighted average price for older people’s homecare in the East of England was £14.06 per hour (or £14.04 if late data is included¹), making it the third-highest average hourly rate in England (page 16 provides an overview of our regional findings). This is not unexpected, given the relatively high costs of living in the region, which is likely to cause wage competition in many areas.

Surprisingly, however, no council in the East of England paid a rate above

UKHCA’s Minimum Price for Homecare of £15.74 / hour (see page 10).
Lowest average price in the region was £12.44 per hour, bringing Southend-on-Sea Council into the lowest quartile of all rates paid in the UK. The average price paid in Essex, which purchased over 70,000 hours of care for older people in the sample week, is particularly disappointing.
Milton Keynes Council provided an inconclusive response 45 working days after our original enquiry.

¹ Luton Council submitted their response 47 working days after our original request, once the majority of this report had already been produced.

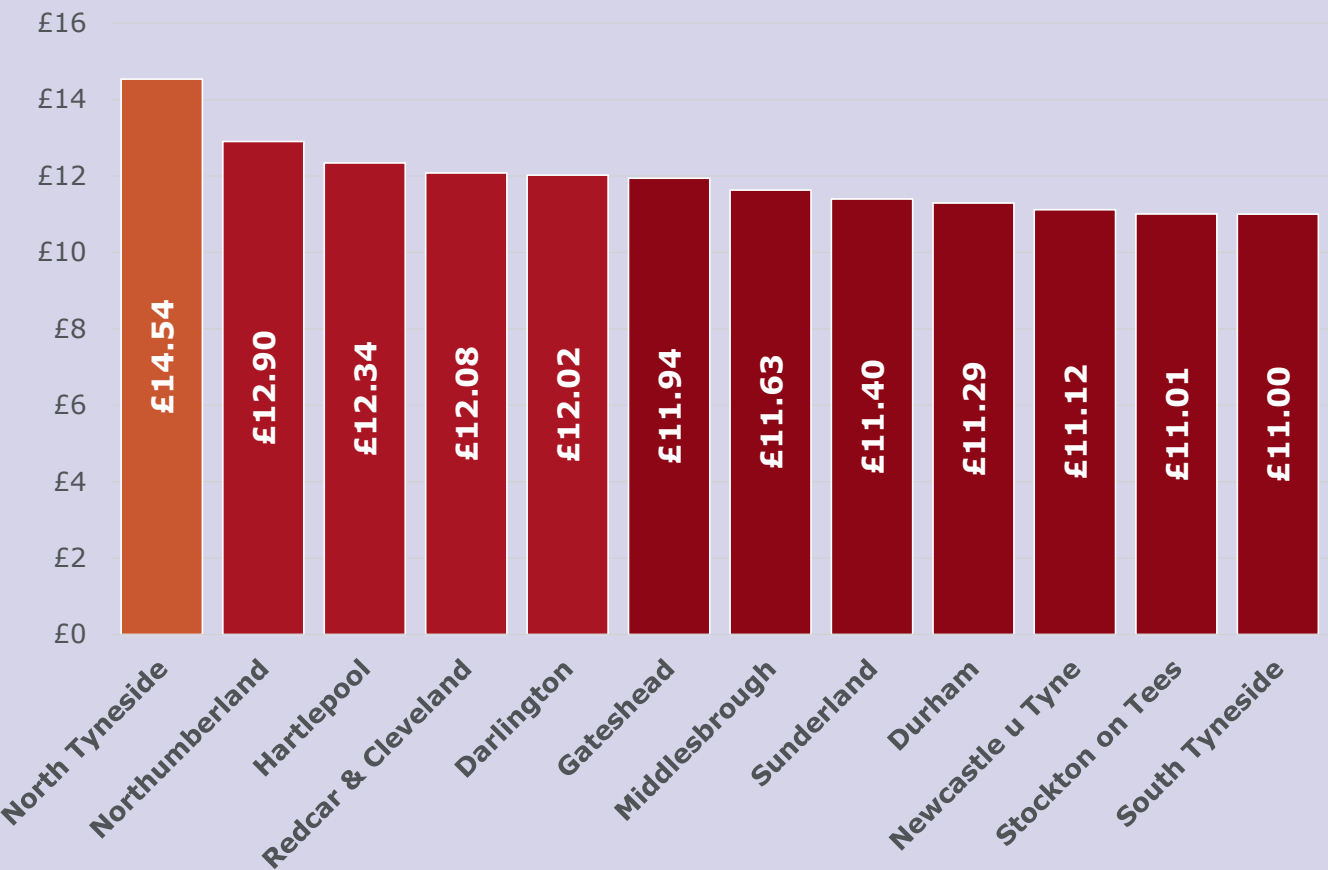
East of England Region



Authority	Lowest Price	Average Price	Highest Price	Hours of care
Bedford Borough	£12.50	£14.70	£19.99	7,373
Cambridgeshire	£13.84	£14.89	£15.90	25,346
Central Beds	£11.75	£14.50	£19.75	167
Essex	£5.36	£13.08	£48.00	70,743
Hertfordshire	£10.51	£14.58	£23.62	43,161
Southend-on-Sea	£12.44	£12.44	£12.76	9,524
Luton (late response)	£12.68	£13.53	£14.20	7,638
Milton Keynes (late response)	£14.12	5,253
Norfolk	£13.44	£15.12	£16.04	34,505
Peterborough	£11.66	£13.10	£15.00	11,789
Suffolk	£12.58	£14.68	£18.60	31,531
Thurrock	£13.00	£13.00	£13.00	7,837

Please see “Disclaimer and Caution” on page 4 in relation to these figures.

North East Region



The weighted average price for older people’s homecare in the North East region was £11.64 per hour (or £11.87 if estimated data is included¹), making this the lowest average rate in England, and the lowest in the UK with the exception of the health and social care trusts in Northern Ireland.

Ten out of the twelve councils in this region fall into the lowest quartile of all rates paid in the UK, the highest proportion of councils in any region in England. Only North Tyneside and Northumberland escape inclusion (page 16 provides an overview of our regional findings).

¹ North Tyneside, Redcar and Cleveland and Stockton-on-Tees councils did not provide average prices. We have provided an estimates based on other data available.

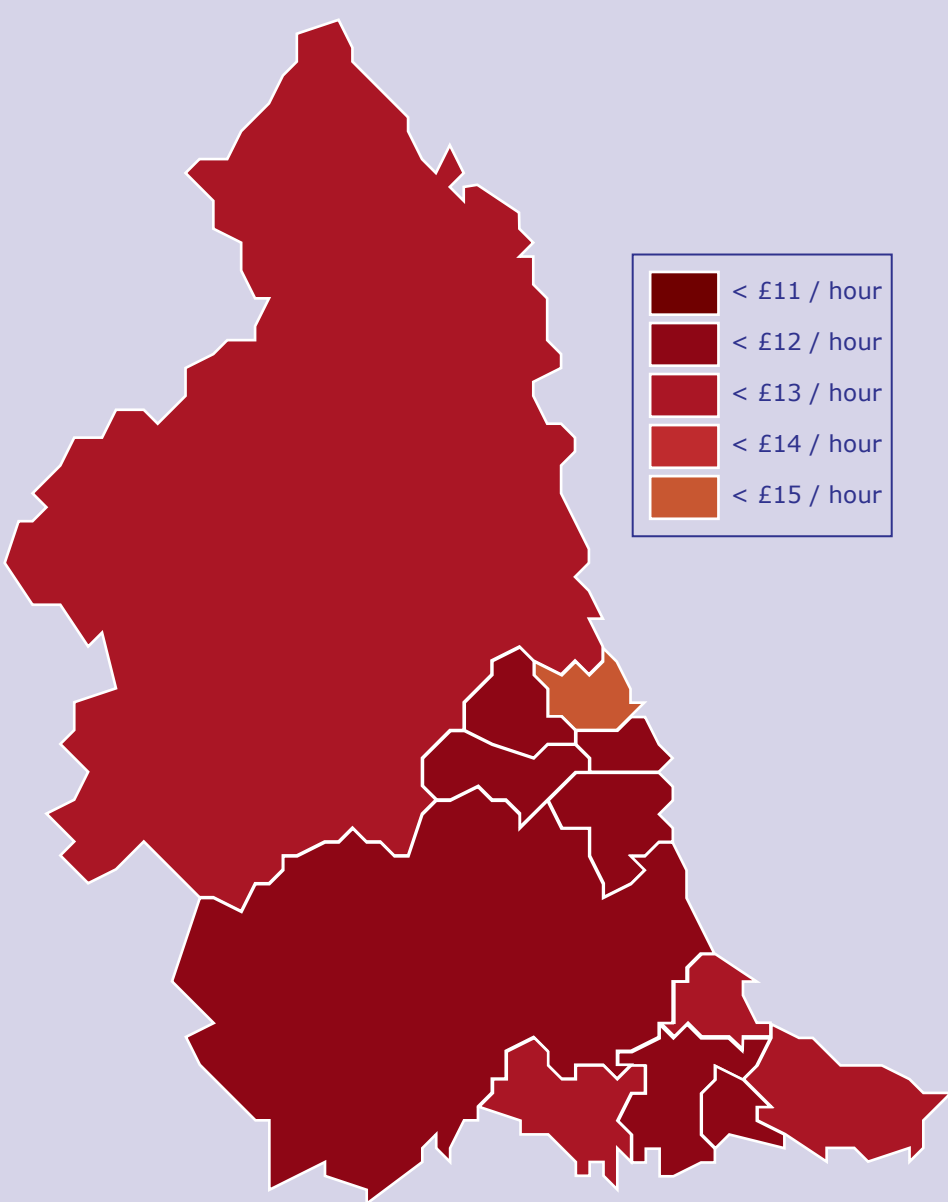
The lowest average price in the region was £11.00 per hour, paid by South Tyneside.

No council in the North East region paid an average price above UKHCA’s Minimum Price for Homecare of £15.74 per hour (see page 10).

South Tyneside (and possibly Stockton-on-Tees) councils were paying an average price at or below our calculation of even the direct costs needed to reward careworkers at the Minimum Wage, if workers’ travel time and travel costs are to be covered.

We can only describe providers in this region as some of the most hard-pressed in the country. The rates paid in this region should provide cause for concern for the authorities themselves, and the statutory regulator, the Care Quality Commission.

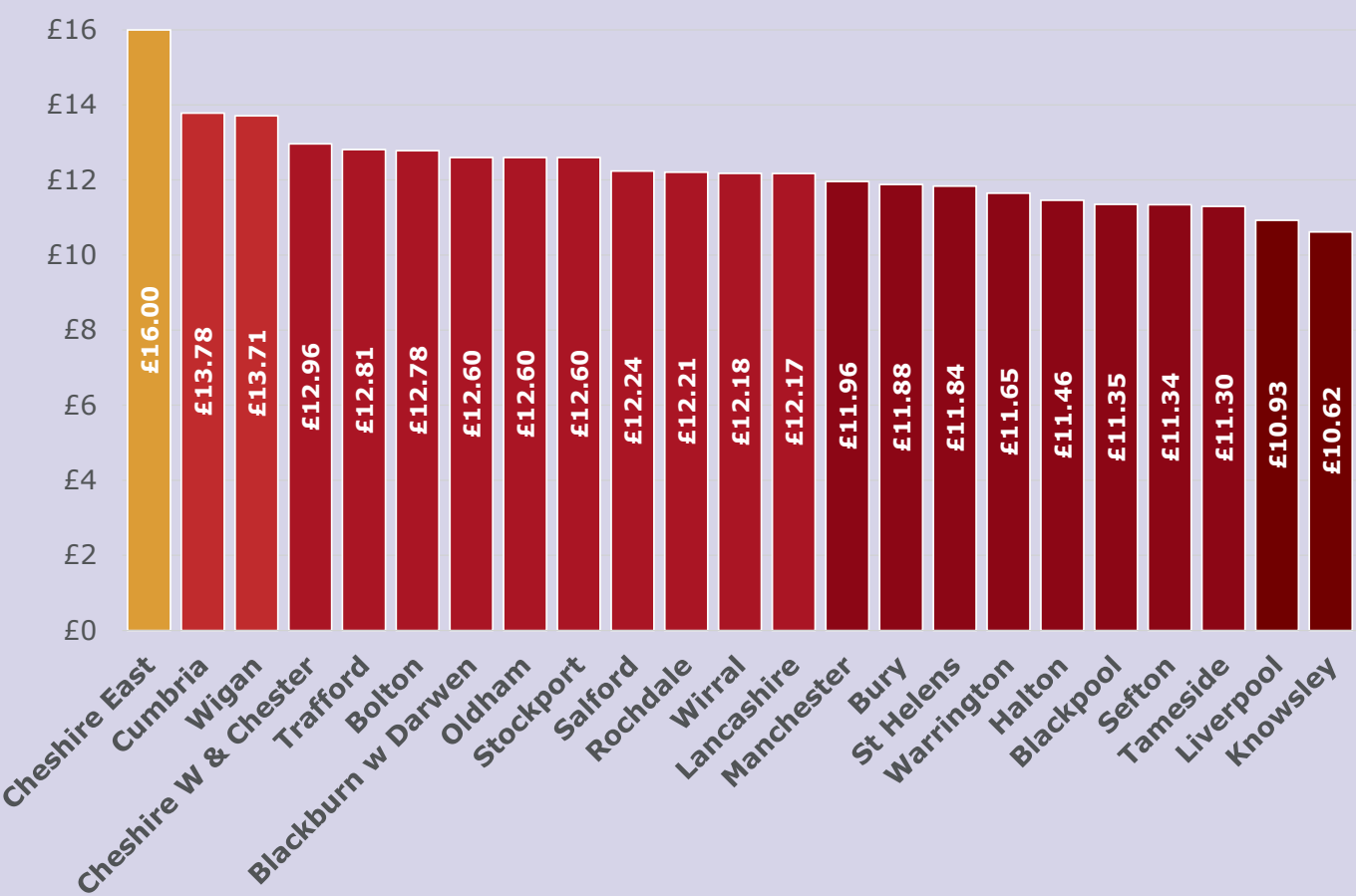
North East Region



Authority	Lowest Price	Average Price	Highest Price	Hours of Care
Darlington	£10.86	£12.02	£13.32	3,403
Durham	£9.10	£11.29	£12.00	21,767
Gateshead	£11.13	£11.94	£14.11	7,134
Hartlepool	£11.68	£12.34	£17.75	4,842
Middlesbrough	£11.28	£11.63	£11.48	8,784
Newcastle upon Tyne	£11.12	£11.12	£11.12	13,688
North Tyneside	£11.27	c. £14.53	£18.80	10,609
Northumberland	£12.34	£12.90	£15.86	14,676
Redcar & Cleveland	£10.99	c. £12.08	£13.50	c. 7,543
South Tyneside	£11.00	£11.00	£11.00	11,500
Stockton-on-Tees	£10.76	c. £11.01	£11.33	8,280
Sunderland	£11.40	£11.40	£11.40	c. 12,062

Please see “Disclaimer and Caution” on page 4 in relation to these figures.

North West Region



Authority	Lowest Price	Average Price	Highest Price	Hours of Care
Blackburn with Darwen	£10.81	£12.60	£16.20	4,513
Blackpool	£11.35	£11.35	£11.35	3,942
Bolton	£11.60	£12.78	£13.25	7,787
Bury	£11.70	£11.88	£12.13	6,359
Cheshire East	£16.00	£16.00	£16.00	4,981
Cheshire West & Chester	£11.75	£12.96	£13.80	7,130
Cumbria	£11.25	£13.78	£16.30	20,255
Halton	£10.50	£11.46	£11.96	5,170
Knowsley	£9.00	£10.62	£14.99	14,028
Lancashire	£11.96	£12.17	£12.17	65,702
Liverpool	£10.64	£10.93	£10.94	29,206
Manchester	..	£11.96	..	16,215
Oldham	£12.60	£12.60	£12.60	10,427
Rochdale	£12.18	£12.21	£14.54	8,111
Salford	£12.24	£12.24	£12.24	1,977
Sefton	£10.76	£11.34	£11.95	11,453
St Helens	£11.03	£11.84	£12.75	8,449
Stockport	£12.60	£12.60	£12.60	16,215

North West Region

The weighted average price for older people’s homecare in the North West region was £12.17 per hour, the second lowest in England after the North East region (page 16 provides an overview of our regional findings).

More than half of the councils in the North West were in the lowest quartile of all rates paid in the UK (14 councils of 23 in the region), giving this region the second highest proportion of such councils of any government region in England.

Only one council, Cheshire East, paid a rate above UKHCA’s Minimum Price for Homecare of £15.74 per hour (see page 10).

The lowest rate paid for the care of older people in the region was Knowsley, with an average price of £10.62 per hour.

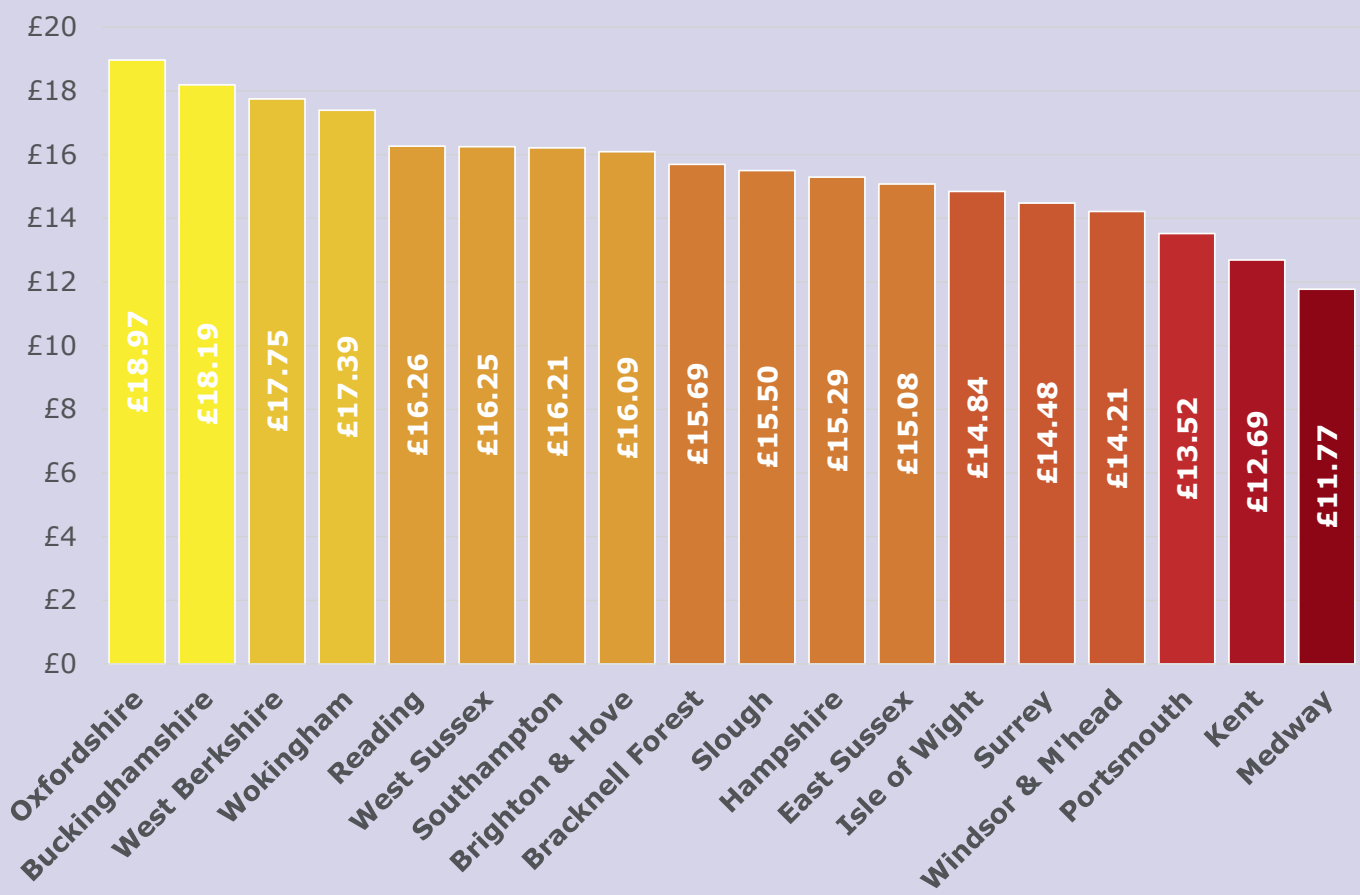
Both Knowsley and Liverpool pay a rate which is so low that it falls below the costs needed to pay careworkers for their working time, travel and other on-costs.

All the councils in the region responded to our enquiry, although Manchester and Warrington councils declined to provide lowest and highest prices paid on the grounds of commercial sensitivity.

Authority	Lowest Price	Average Price	Highest Price	Hours of Care
Tameside	£10.66	£11.30	£11.42	8,973
Trafford	£12.81	£12.81	£12.81	10,067
Warrington	..	£11.65	..	6,803
Wigan	£11.72	£13.71	£15.00	7,193
Wirral	£12.00	£12.18	£12.28	8,675

Please see “Disclaimer and Caution” on page 4 in relation to these figures.

South East Region



The weighted average price for older people’s homecare in the South East region was £15.54 per hour (or £15.16 if estimates for missing data¹ are included), giving this region the second-highest weighted average price in the UK.

The higher average prices in the region should not be surprising, given the general assumption that a higher cost of living and concentration of employment in the region will create wage competition within the labour market

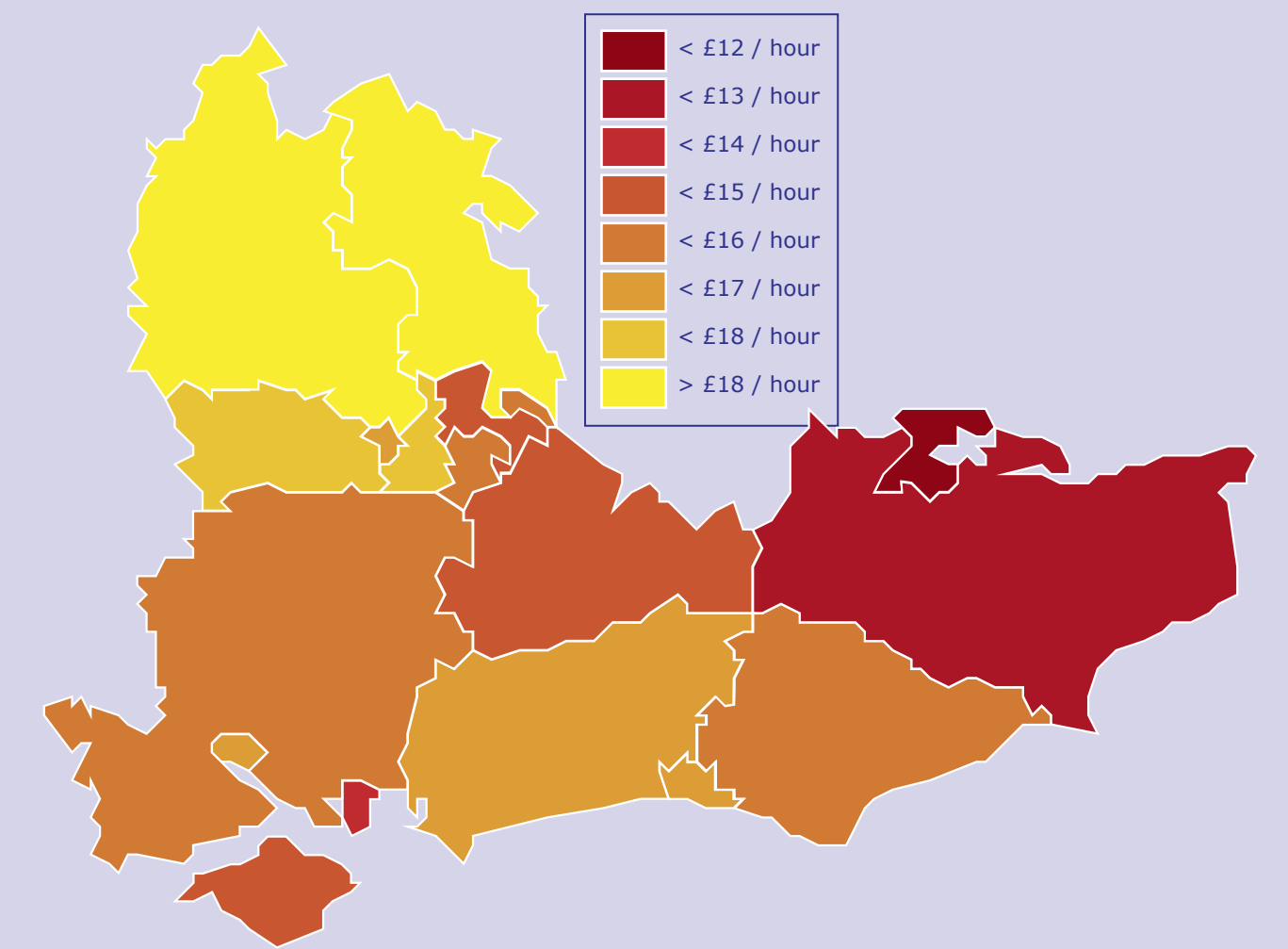
¹ Kent County Council did not provide an average price. We have assumed £12.69 from the data available to us. Windsor and Maidenhead declined to supply any data on the grounds of exceeding the cost limit and our data was supplied from a response to a similar enquiry. Surrey County Council declined to supply all but the average price.

(page 16 provides an overview of our regional findings).

Despite the relatively high average prices in the region, only eight councils out of 18 paid a rate above UKHCA’s Minimum Price for Homecare of £15.74 per hour (see page 10).

The lowest average price in the region was £11.77 per hour, from Medway Council, which places this council in the lowest quartile of all average prices paid in the UK. Prices in Kent and Portsmouth were also surprisingly low.

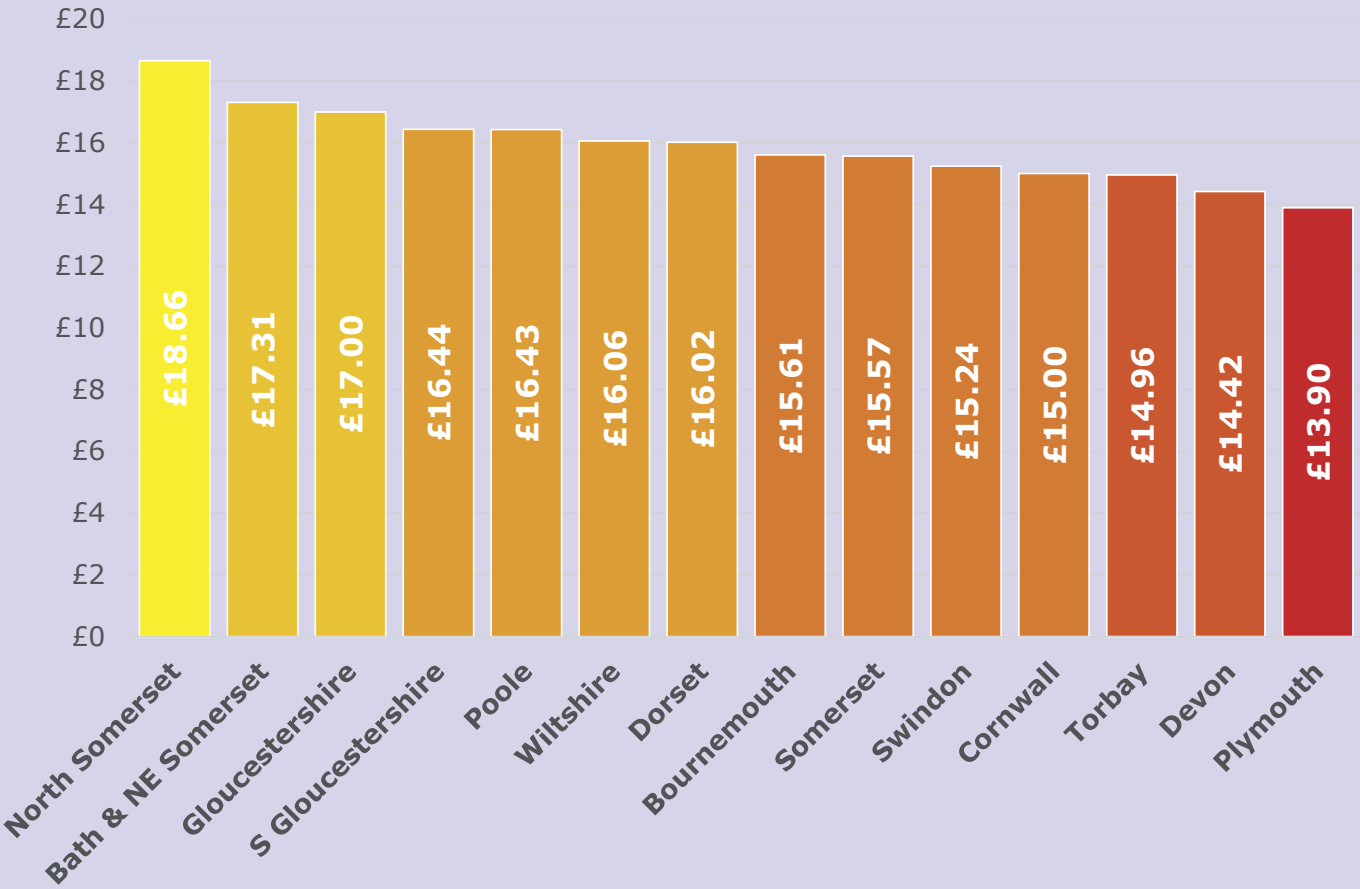
South East Region



Authority	Lowest Price	Average Price	Highest Price	Hours of care
Bracknell Forest	£15.07	£15.69	£24.49	1,015
Brighton & Hove	£14.80	£16.09	£17.30	9,241
Buckinghamshire	£13.64	£18.19	£30.02	12,579
East Sussex	£12.88	£15.08	£19.86	15,903
Hampshire	£11.69	£15.29	£22.81	49,977
Isle of Wight	£14.84	£14.84	£14.84	5,783
Kent	£11.25	c. £12.69	£14.57	34,023
Medway	£11.65	£11.77	£12.15	9,788
Oxfordshire	£12.67	£18.97	£26.43	19,713
Portsmouth	£13.52	£13.52	£13.52	6,350
Reading	£13.64	£16.26	£17.76	5,395
Slough	£12.64	£15.50	£17.76	5,005
Southampton	£9.56	£16.21	£37.84	8,418
Surrey	..	£14.48	..	c. 57,743
West Berkshire	£16.75	£17.75	£18.00	827
West Sussex	£12.95	£16.25	£25.00	16,475
Windsor & M’head	..	c. £14.21	..	c. 4,644
Wokingham	£10.00	£17.39	£44.27	3,504

Please see “Disclaimer and Caution” on page 4 in relation to these figures.

South West Region



The weighted average price for older people’s homecare in the South West region was £15.85 per hour (or £15.75 per hour if estimated data¹ is included), making it the region with the highest average price in the UK (page 16 provides an over-view of our regional findings).

The lowest average price in the region was £13.90 per hour, paid by Plymouth City Council.

All councils in the South West region fall into the upper three quartiles of all rates paid in the UK, the only region to do so. However, half of the councils in the region pay an average price below

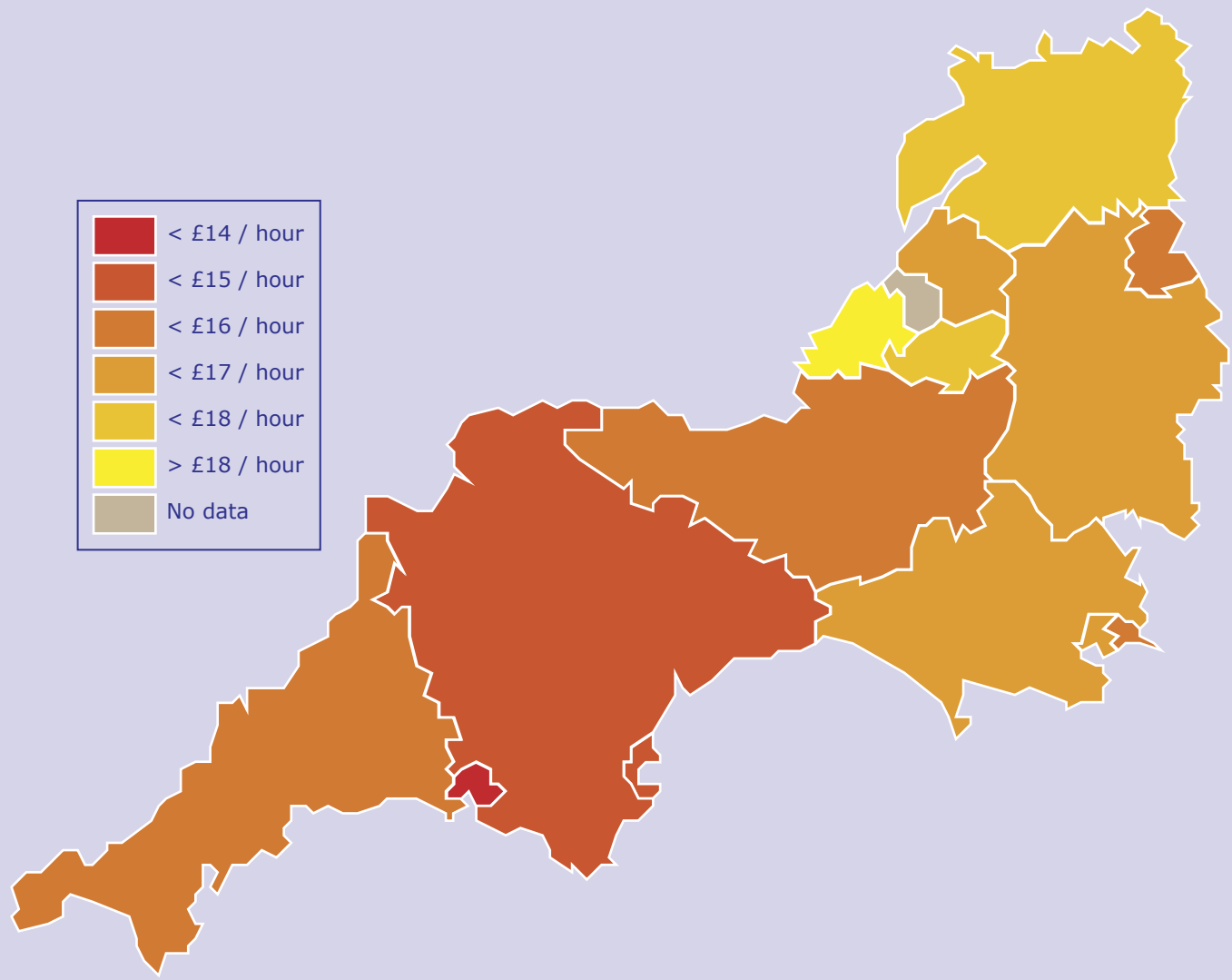
¹ Cornwall County Council’s reply was incomplete, on the grounds that they did not hold all of the data requested. We have estimated the average price paid and hours purchased.

UKHCA’s Minimum Price for Homecare of £15.74 per hour (see page 10): 7 of the 14 councils where the average price is known .

While the average prices paid appear reasonably high, we note that councils supplying large rural populations (where careworkers may undertake above average travel time) generally offer lower prices than more dense urban areas.

Bristol City Council did not respond to our freedom of information request, while the Council of the Isles of Scilly confirmed that they did not purchase homecare services from the independent or voluntary sectors.

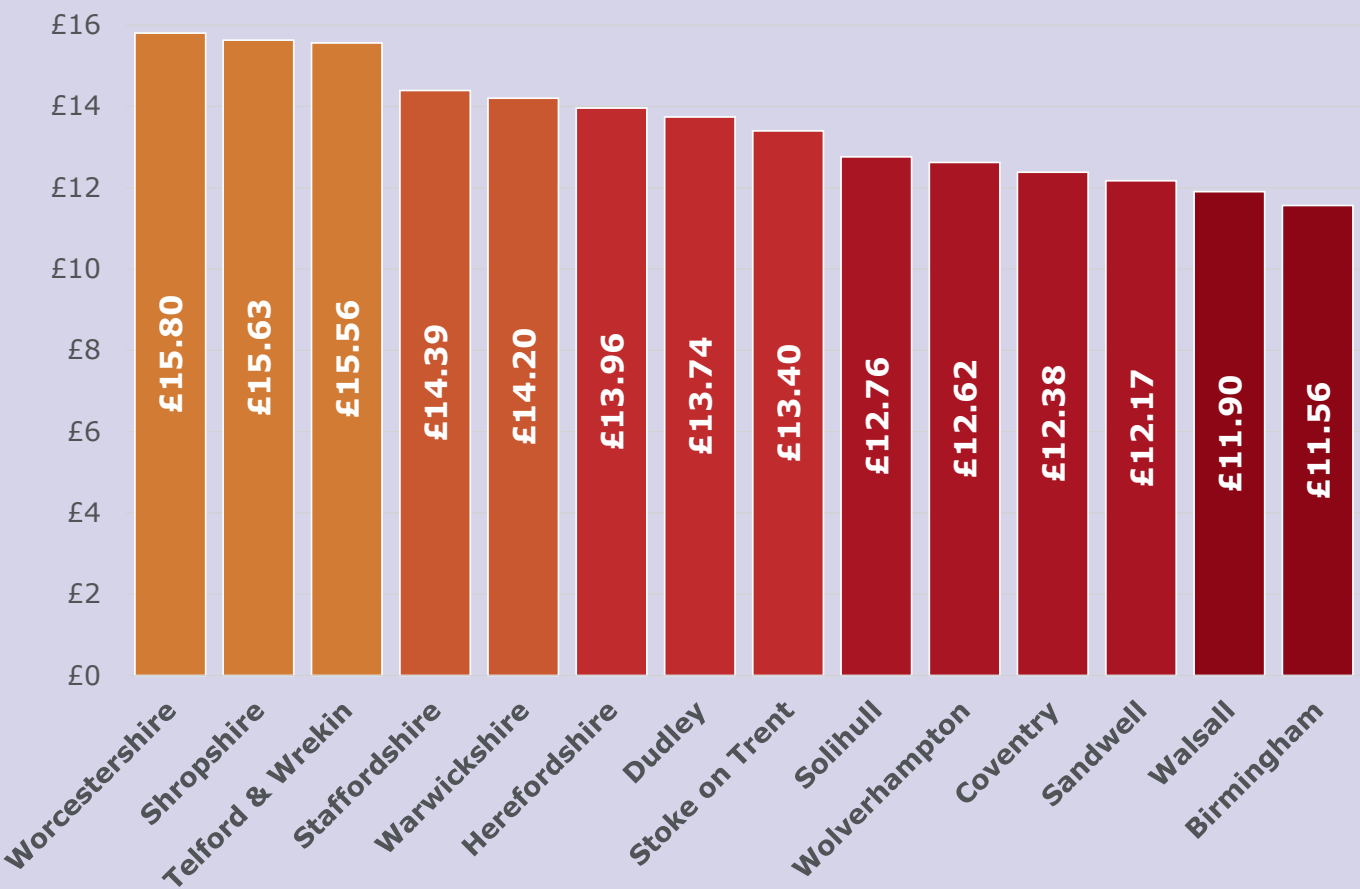
South West Region



Authority	Lowest Price	Average Price	Highest Price	Hours of Care
Bath & NE Somerset	£16.56	£17.31	£17.60	4,722
Bournemouth	£12.59	£15.61	£16.90	8,291
Bristol	c. £15.00	..	c. £18.20	..
Cornwall	£12.90	c. £15.00	£17.75	c. 22,624
Devon	..	£14.42	..	36,000
Dorset	£14.00	£16.02	£24.77	12,936
Gloucestershire	£10.20	£17.00	£32.41	42,455
North Somerset	£15.23	£18.66	£22.68	6,601
Plymouth	£11.86	£13.90	£32.00	9,729
Poole	£13.60	£16.43	£40.00	8,583
Somerset	£15.54	£15.57	£16.36	19,444
S Gloucestershire	£12.48	£16.44	£20.80	12,517
Swindon	£15.24	£15.24	£15.24	8,198
Torbay	£14.00	£14.96	£19.03	7,140
Wiltshire	£14.85	£16.06	£17.00	..

Please see “Disclaimer and Caution” on page 4 in relation to these figures.

West Midlands Region



The weighted average price for older people’s homecare in the West Midlands was £13.90 per hour (or £13.59 if the late response from Walsall Council¹ is included) (page 16 provides an over-view of our regional findings).

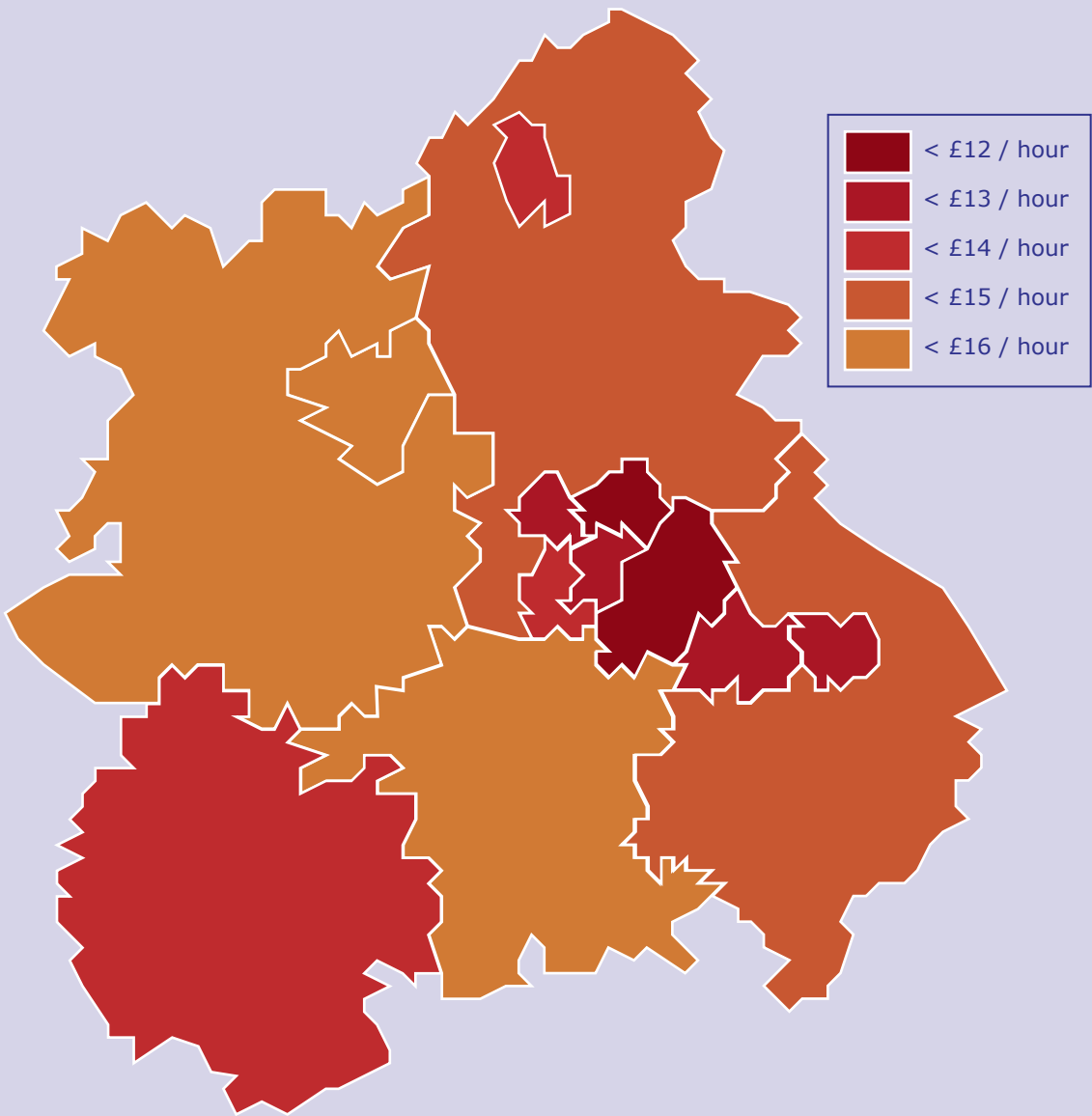
The lowest average price in the region, paid by Birmingham City Council, was £11.56 per hour.

Four councils in this region fall into the lowest quartile of all rates paid in the UK: Birmingham, Coventry, Sandwell and Walsall.

Only one council, Worcestershire, paid a rate above UKHCA’s Minimum Price for Homecare of £15.74 per hour (see page 10), with two other councils coming close to this figure.

¹ Walsall Council supplied their data 43 working days after our initial request, after the majority of this report had been written.

West Midlands Region



Authority	Lowest Price	Average Price	Highest Price	Hours of Care
Birmingham	£10.14	£11.56	£13.00	1,378
Coventry	£11.12	£12.38	£20.90	12,000
Dudley	£13.44	£13.74	£13.84	10,747
Herefordshire	£12.46	£13.96	£16.78	7,333
Sandwell	£12.17	£12.17	£12.17	8,913
Shropshire	£8.10	£15.63	£37.26	972
Solihull	£10.96	£12.76	£21.60	8,460
Staffordshire	£12.49	£14.39	£16.95	36,935
Stoke on Trent	£13.00	£13.40	£15.46	10,532
Telford & Wrekin	£10.50	£15.56	£17.95	6,226
Walsall (late response)	£10.10	£11.90	£16.75	28,318
Warwickshire	£12.12	£14.20	£17.84	28,108
Wolverhampton	£12.00	£12.62	£13.50	7,313
Worcestershire	£11.00	£15.80	£40.00	12,614

Please see “Disclaimer and Caution” on page 4 in relation to these figures.

Yorkshire & The Humber



The weighted average price for older people’s homecare in Yorkshire and the Humber was £13.23 per hour,¹ making this the third-lowest average amongst England’s nine government regions (page 16 provides an overview of our regional findings).

The lowest average price in the region was £11.65 per hour, paid by North East Lincolnshire Council.

Two councils in this region fall into the lowest quartile of all rates paid in the UK: North East Lincolnshire and Rotherham.

Only North Yorkshire County Council paid an average price above UKHCA’s

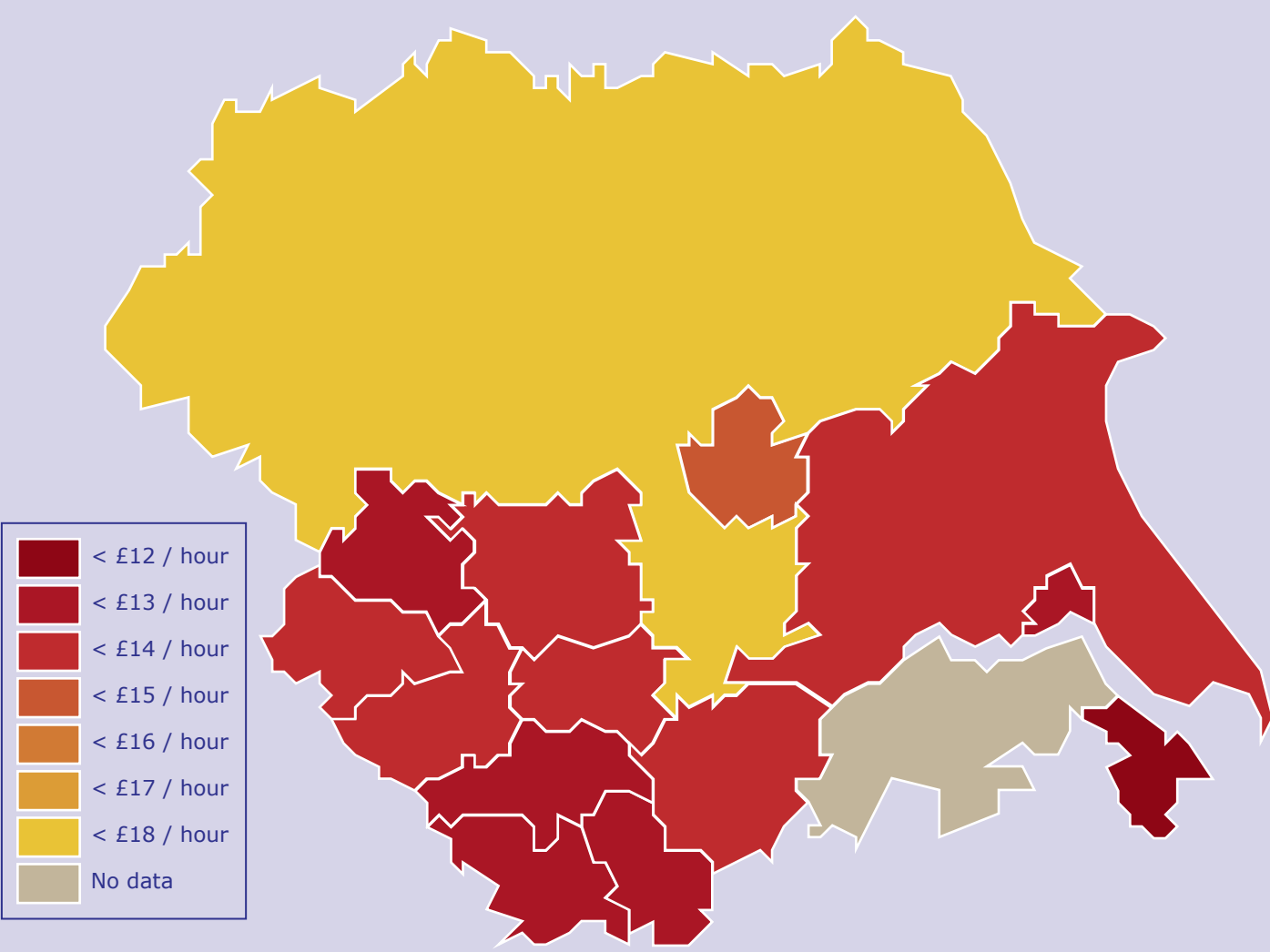
Minimum Price for Homecare of £15.74 per hour (see page 10).

North Yorkshire’s average price is somewhat out-of-step with other councils in the region. There may be a number of reasons for this, including the extreme rural nature of the county. We understand that a re-procurement exercise is underway, which is likely to reduce the average price paid, compared to the sample week used in this survey.

North Lincolnshire Council advised that it did not hold the data requested, on the basis that it does not commission homecare services on an hourly basis.

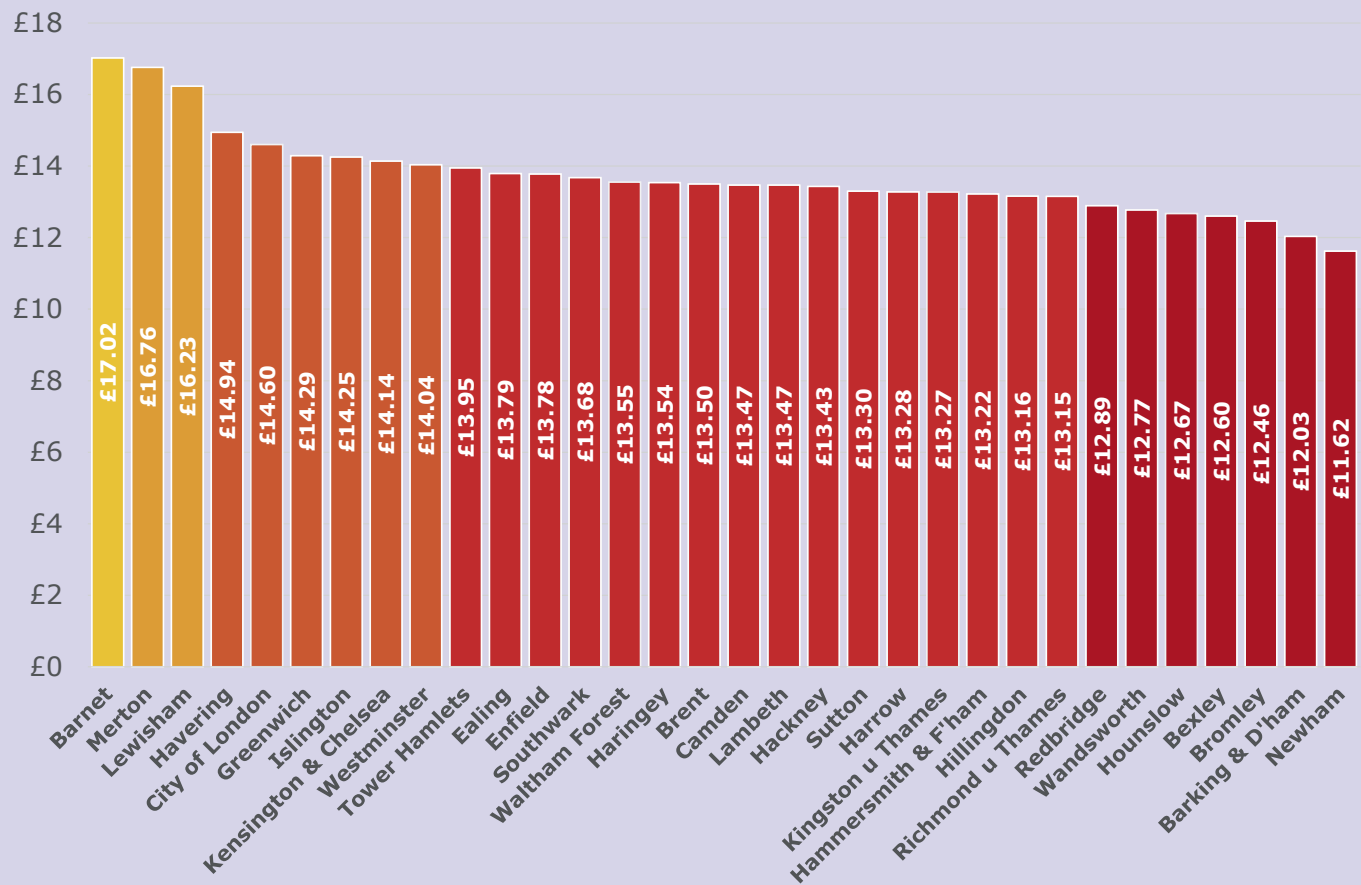
¹ The figure is unaffected by the estimation of hours for Kirklees Council

Yorkshire & The Humber



Authority	Lowest Price	Average Price	Highest Price	Hours of Care
Barnsley	£11.00	£12.50	£14.00	17,745
Bradford	£11.00	£12.55	£15.38	16,621
Calderdale	£12.24	£13.17	£14.57	7,988
Doncaster	£13.04	£13.04	£13.04	16,374
East Riding of Yorks	£9.98	£13.22	£17.78	16,720
Kingston upon Hull	£12.80	£12.80	£12.80	19,478
Kirklees	..	£13.30	..	c. 10,600
Leeds	£10.84	£13.08	£13.50	20,519
NE Lincolnshire	£10.05	£11.65	£11.88	7,227
North Lincolnshire	c. 4,725
North Yorkshire	£10.10	£17.06	£40.00	16,373
Rotherham	£11.63	£12.42	£13.37	13,596
Sheffield	£12.25	£12.63	£13.00	18,530
Wakefield	£13.39	£13.39	£13.39	9,926
York	£12.79	£14.51	£17.45	6,164

Please see “Disclaimer and Caution” on page 4 in relation to these figures.



The weighted average price for older people’s homecare in Greater London was £13.61 per hour (page 16 provides an over-view of our regional findings). The lowest average price in Greater London was in Newham, at £11.62 per hour.

Compared to the South East region and East of England, where average prices are among the highest in the country, average prices in London appear exceptionally low, given the high living costs in the region. These findings are broadly in line with previous work we have undertaken.

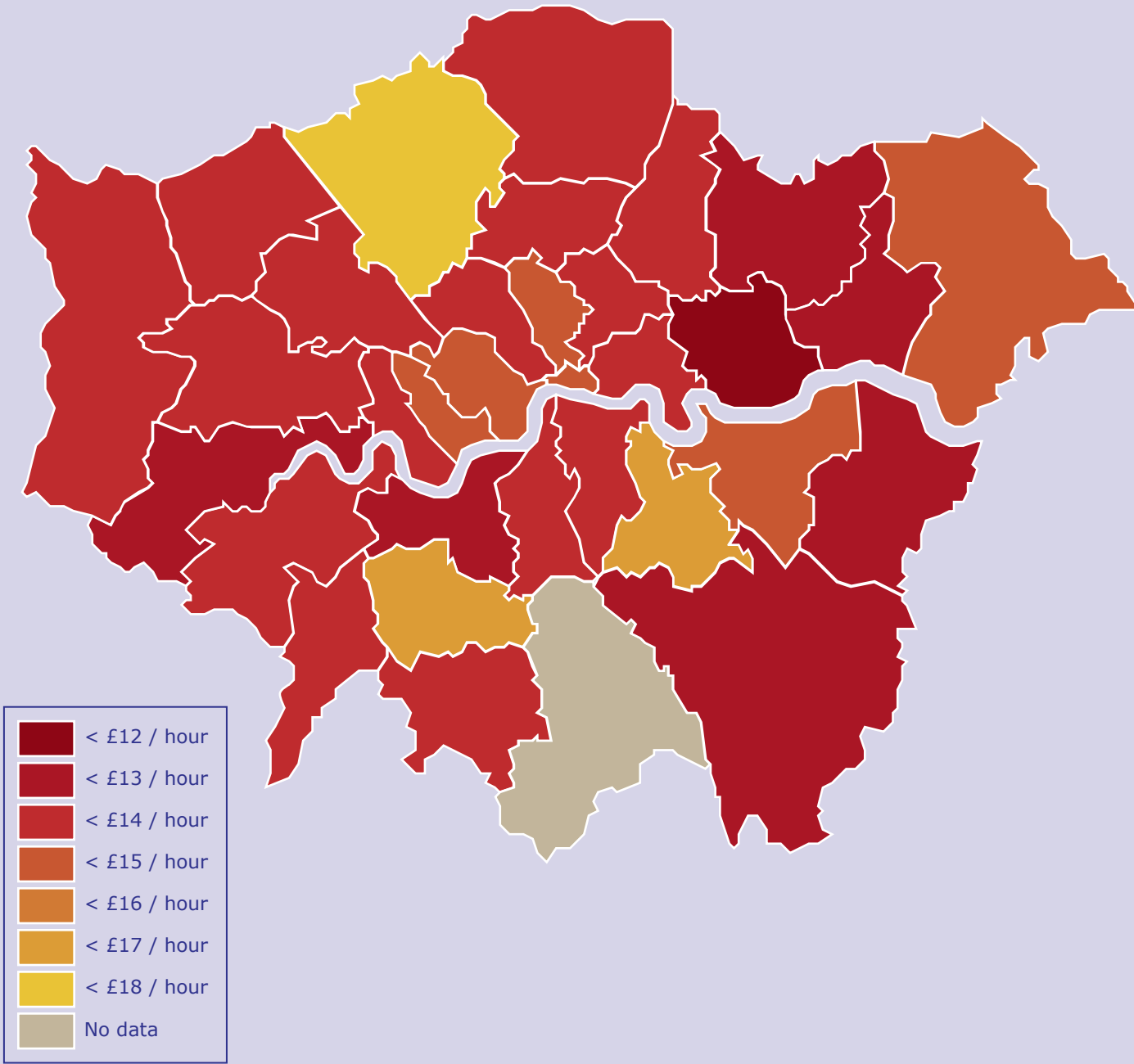
While we cannot demonstrate the cause of this from our analysis, we suspect that this is accounted for by a combination of the exceptional nature of London’s population and the ability of

London boroughs to take advantage of the significant competition between the large number of homecare providers in the capital.

Three London boroughs fall into the lowest quartile of all rates paid in the UK: Barking & Dagenham, Bromley and Newham.

Only three boroughs (Barnet, Lewisham and Merton) paid a rate above UKHCA’s Minimum Price for Homecare of £15.74 per hour (see page 10), and no council in London paid a sufficiently high rate to pay our estimate for the London Living Wage (which we estimate to be £21.33 per hour).

The London Borough of Croydon refused to answer our enquiry on the grounds of commercial sensitivity.



Please see the following page for the table showing the lowest, average and highest rates paid in the Greater London area.

Authority	Lowest Price	Average Price	Highest Price	Hours of Care
Barking & Dagenham	£11.08	£12.03	£13.95	5,583
Barnet	£11.60	£17.02	£27.00	7,446
Bexley	£12.60	£12.60	£12.60	9,547
Brent	£10.23	£13.50	£13.70	14,779
Bromley	£11.26	£12.46	£12.64	10,775
Camden	£9.49	£13.47	£16.93	11,840
City of London	£12.90	£14.60	£18.00	172
Croydon	c. £12.04	..	c. £19.48	c. 10,080
Ealing	£11.40	£13.79	£18.50	18,290
Enfield	£13.71	£13.78	£13.85	21,750
Greenwich	£11.62	£14.29	£65.00	12,133
Hackney	£11.97	£13.43	£15.23	7,312
Hammersmith & Fulham	£10.90	£13.22	£24.57	9,719
Haringey	£10.95	£13.54	£20.00	10,920
Harrow	£11.00	£13.28	£16.09	2,857
Havering	£14.94	£14.94	£14.94	11,477
Hillingdon	£11.27	£13.16	£19.15	13,487
Hounslow	£11.09	£12.67	£17.78	9,953
Islington	£10.72	£14.25	£16.36	9,927
Kensington & Chelsea	£12.25	£14.14	£16.67	4,643
Kingston upon Thames	£12.50	£13.27	£20.00	3,503
Lambeth	£10.58	£13.47	£31.00	10,795
Lewisham	£10.32	£16.23	£18.78	1,956
Merton	£9.60	£16.76	£23.92	8,044
Newham	£10.67	£11.62	£17.31	13,311
Redbridge	£9.26	£12.89	£20.64	9,580
Richmond upon Thames	£12.85	£13.15	£20.33	5,609
Southwark	£11.50	£13.68	£25.00	20,214
Sutton	£12.40	£13.30	£18.32	14,584
Tower Hamlets	£12.15	£13.95	£14.50	11,595
Waltham Forest	£13.20	£13.55	£13.33	6,969
Wandsworth	£9.99	£12.77	£16.27	9,657
Westminster	£8.75	£14.04	£49.85	15,229

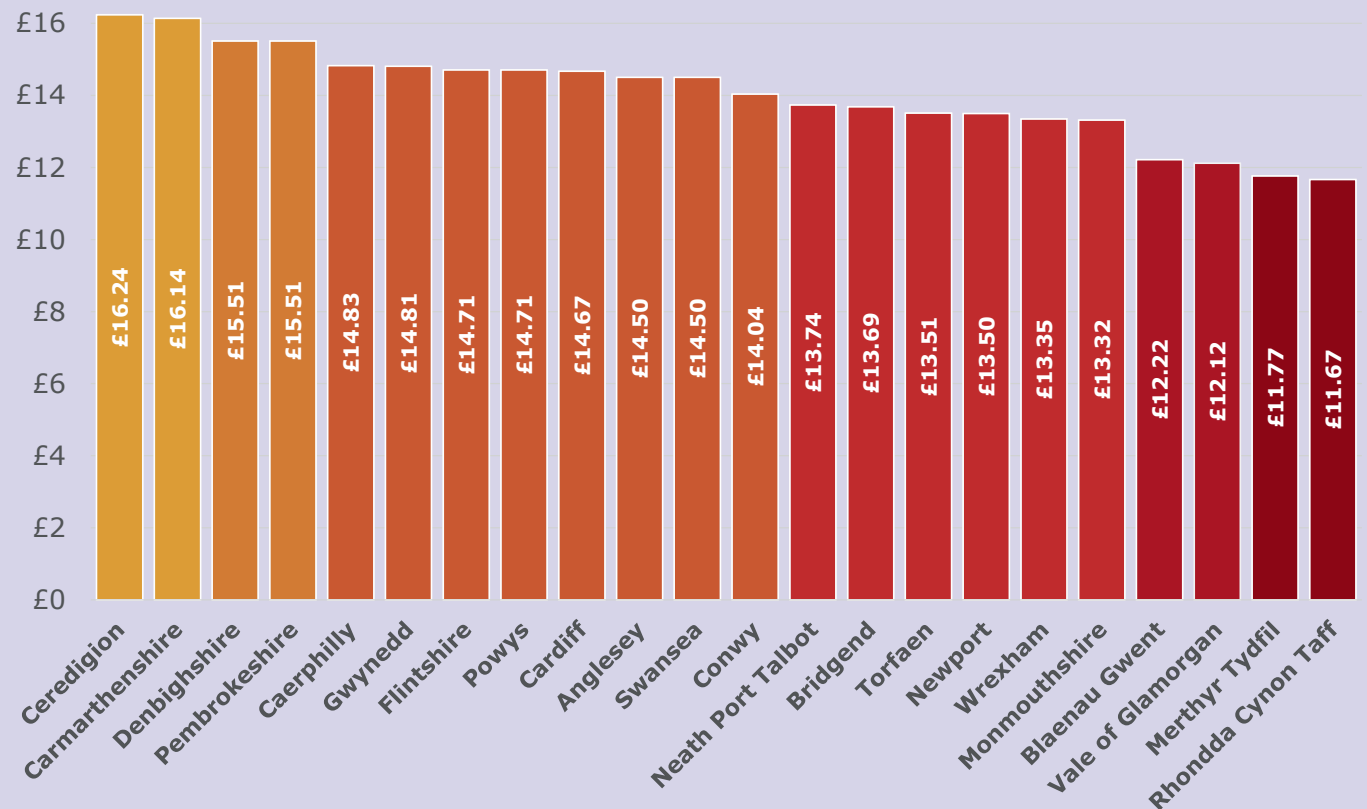
Please see “Disclaimer and Caution” on page 4 in relation to these figures.

Social care is a devolved matter in Wales, Scotland and Northern Ireland.

The results of our freedom of information requests are provided in the following sections.

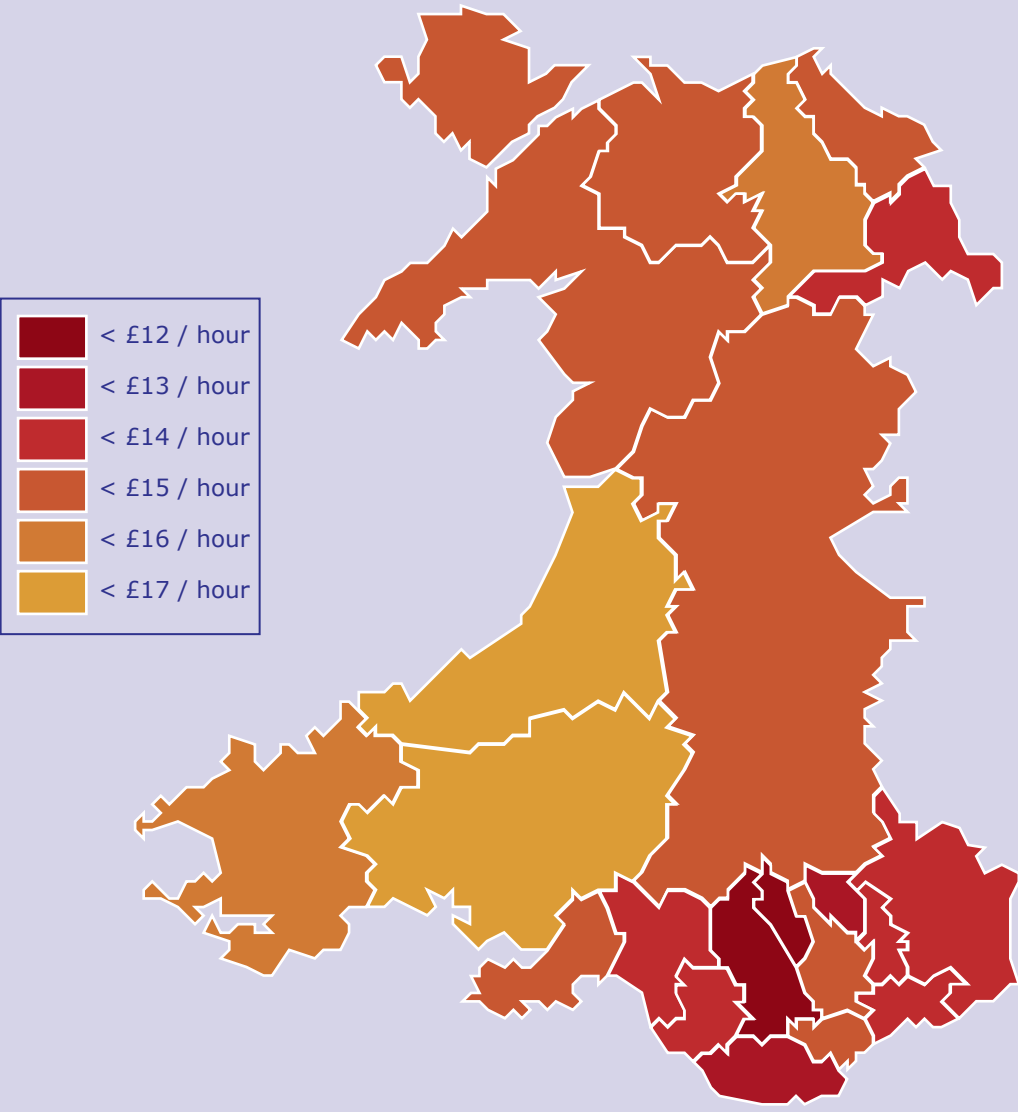
Please see page 14 for a comparison of the data for all four administrations.

The findings of these enquiries should be of interest to government in each administration and the respective statutory regulators as well as the authorities themselves.



Authority	Lowest Price	Average Price	Highest Price	Hours of Care
Anglesey	£14.50	£14.50	£14.50	5,600
Blaenau Gwent	£12.22	£12.22	£12.22	5,235
Bridgend	£11.40	£13.69	£15.49	4,257
Caerphilly	£12.18	£14.83	£19.48	7,107
Cardiff	£10.13	£14.67	£42.01	19,889
Carmarthenshire	£13.17	£16.14	£19.06	11,333
Ceredigion	£15.00	£16.24	£17.75	..
Conwy	£14.04	£14.04	£14.04	7,013
Denbighshire	£12.00	£15.51	£21.68	3,396
Flintshire	£14.71	£14.71	£14.71	8,718
Gwynedd	£14.35	£14.81	£15.65	5,488
Merthyr Tydfil	£11.48	£11.77	£12.15	1,916
Monmouthshire	£11.75	£13.32	£15.00	..
Neath Port Talbot	£13.42	£13.74	£14.47	6,723
Newport	£12.17	£13.50	£15.79	6,826
Pembrokeshire	£9.16	£15.51	£18.94	10,081
Powys	..	c. £14.71	..	12,541
Rhondda Cynon Taff	£10.00	£11.67	£12.71	10,010
Swansea	£14.50	£14.50	£14.50	12,108
Torfaen	£12.00	£13.51	£16.80	6,407
Vale of Glamorgan	£11.00	£12.12	£13.17	9,002
Wrexham	£12.48	£13.35	£14.05	7,885

Please see "Disclaimer and Caution" on page 4 in relation to these figures.



The weighted average price for older people’s homecare for all councils in Wales was £14.28 per hour¹ (or £14.39 if estimated² and data submitted late³ is included). The weighted average price paid places Wales above all but two of England’s government regions (page 16 provides an over-view of our regional findings).

The lowest average price in the region was £11.67 per hour, paid by Rhondda Cynon Taff.

Only two councils, Ceredigion and Carmarthenshire, paid a rate above UKHCA’s Minimum Price for Homecare of £15.74 per hour (see page 10). We note that prices in these councils may reflect the rural nature of the areas covered, where workers’ travel time may be exceptionally high.

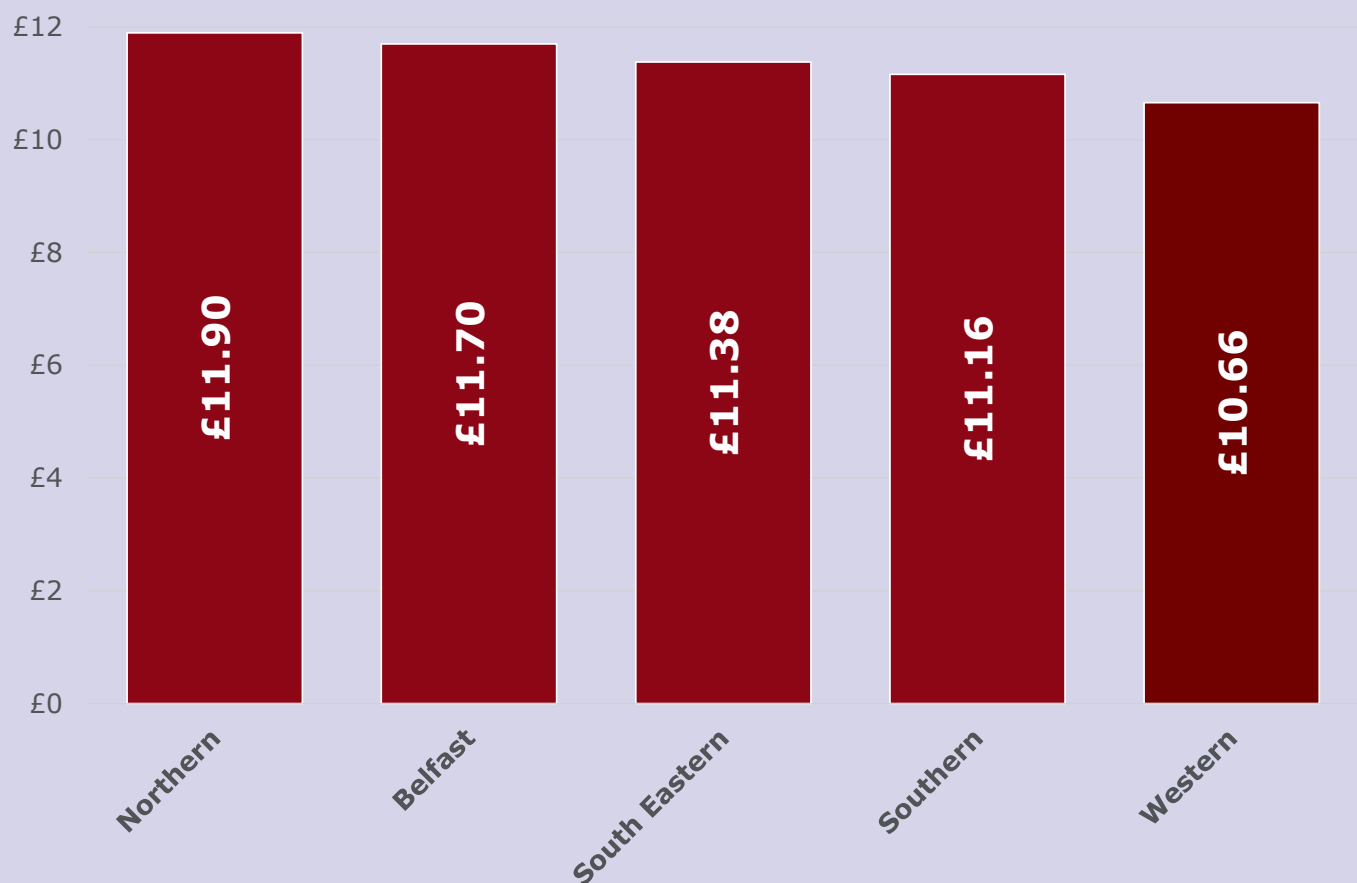
Four councils in Wales fall into the lowest quartile of all rates paid in the UK: Blaenau Gwent, Merthyr Tydfil, Rhondda Cynon Taff and Vale of Glamorgan.

1 Figures for Ceredigion County Council have been excluded from calculations, as we were unable to establish the hours of care purchased.

2 Powys Council declined to provide a complete response on the grounds of commercial sensitivity. Our estimate of average price is the midpoint between two different averages supplied by the authority.

3 Rhondda Cynon Taff Council did not provide a response until 54 working days from our enquiry.

Northern Ireland



The weighted average price for older people’s homecare for the Health and Social Care Trusts in Northern Ireland was £11.35 per hour,¹ the lowest in the United Kingdom (page 16 provides an overview of our regional findings).

All five Trusts in Northern Ireland fall into the lowest quartile of rates paid in the UK, the only part of the UK where this is the case. We suggest that older people who use homecare services, and members of the homecare workforce, are possibly the most underfunded amongst all four nations.

The lowest average price in the region was £10.66 per hour by the Western Trust. This rate is extremely low,

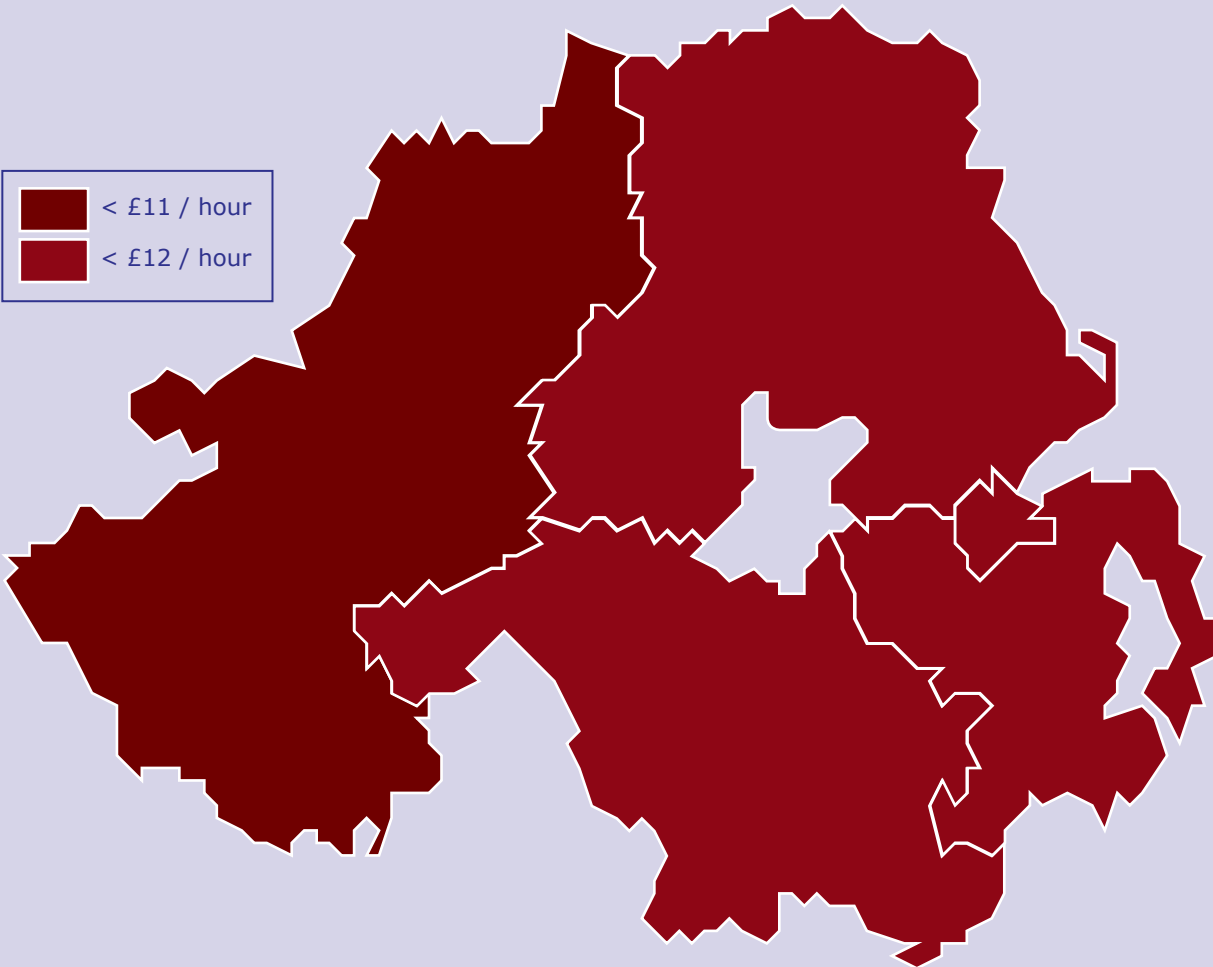
¹ This figure includes an estimated average price supplied by the Southern Health and Social Care Trust.

particularly compared to our estimate of £11.01 to meet careworkers’ “contact time”, travel time and on-costs to comply with National Minimum Wage.

No Trust pays an average rate above UKHCA’s Minimum Price for Homecare of £15.74 per hour (see page 10).

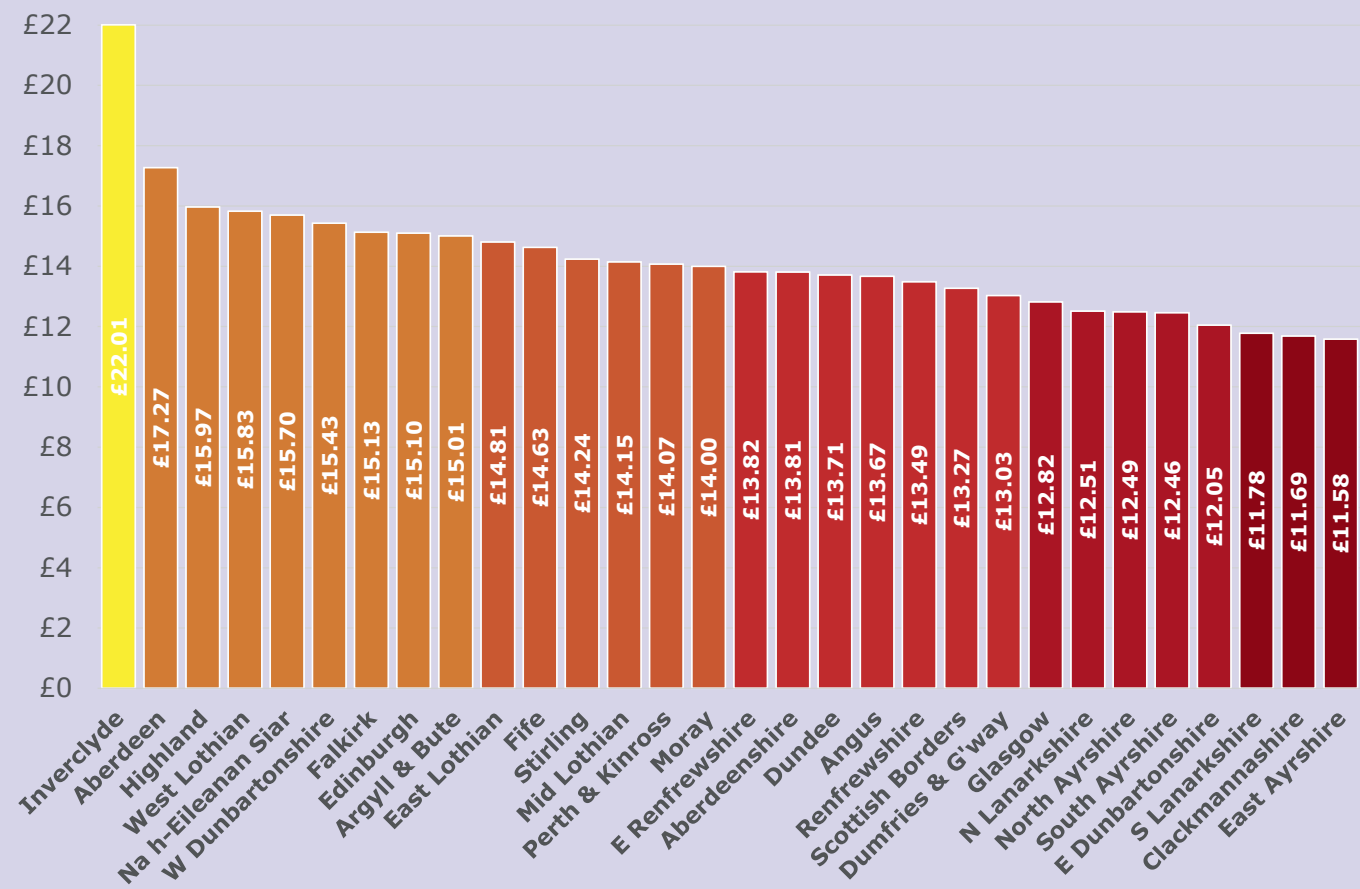
We believe that the exceptionally low average prices paid in Northern Ireland should be a particular concern for the health and social care trusts themselves, the Health and Social Care Board (which is responsible for implementing a comprehensive framework for performance management and service improvement) and the statutory regulators: the Regulation and Quality Improvement Authority (RQIA) and the Northern Ireland Social Care Council (NISCC).

Northern Ireland



Authority	Lowest Price	Average Price	Highest Price	Hours of Care
Belfast HSCT	£11.70	£11.70	£11.70	21,294
Northern HSCT	£11.00	£11.90	£17.50	25,374
South Eastern HSCT	£10.00	£11.38	£12.25	33,193
Southern HSCT	£10.27	c. £11.16	£11.54	26,200
Western HSCT	£10.29	£10.66	£11.04	25,379

Please see “Disclaimer and Caution” on page 4 in relation to these figures.



The weighted average price for older people's homecare in Scotland was £13.68 per hour (or £13.62 if estimated data for East Ayrshire is included¹)² (page 16 provides an overview of our findings for the devolved administrations and the government regions in England).

The lowest average price in the region was £11.58 per hour in East Ayrshire.

Five councils in Scotland fell into the lowest quartile of all rates paid in the

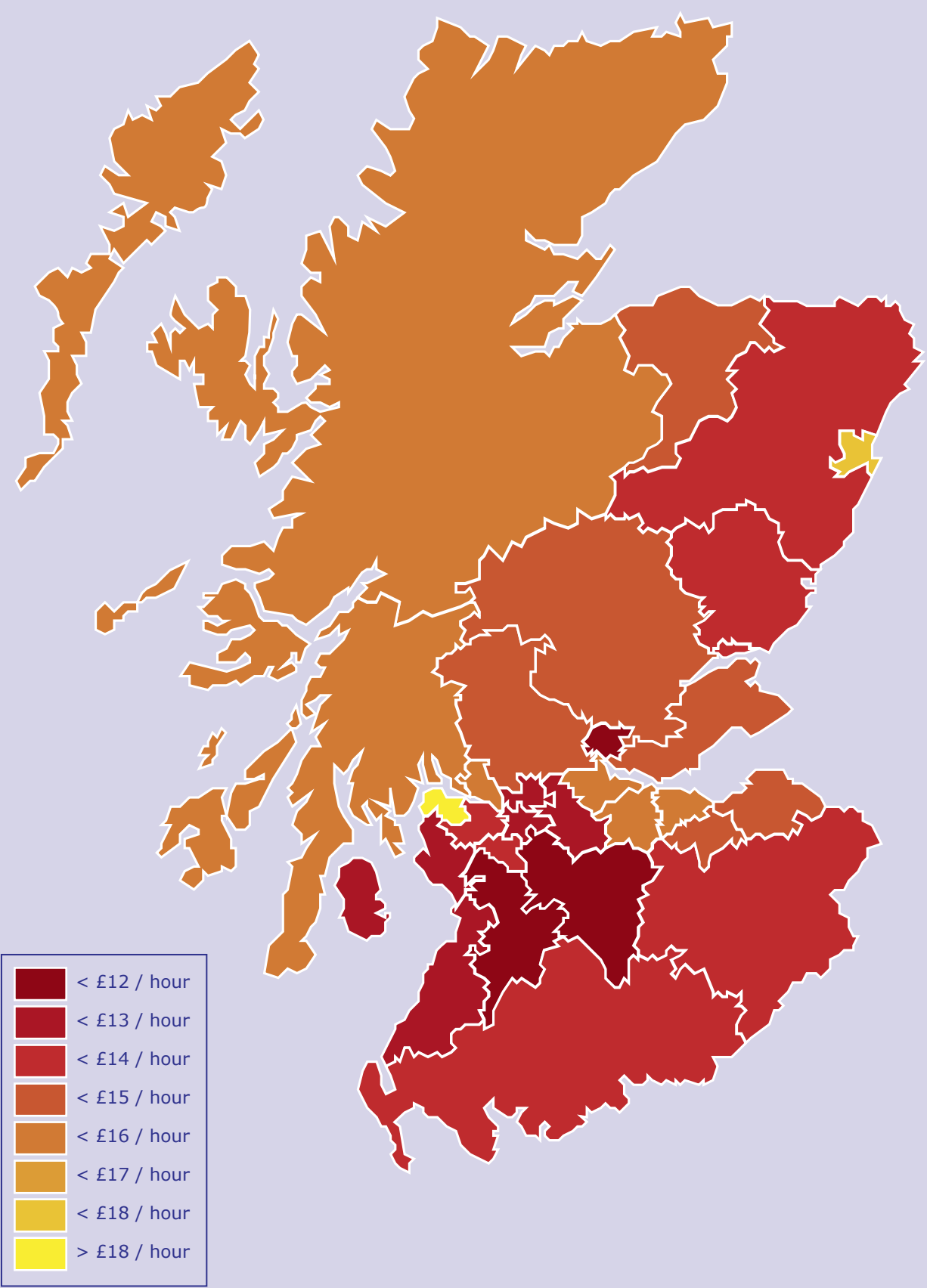
1 East Ayrshire Council advised that they did not know the average price. As the difference between the lowest and highest price was so narrow, a reasonable estimate has been calculated.

2 Excluded from both calculations are data for East Renfrewshire, which supplied an incomplete response and West Dunbartonshire, which advised that it did not hold all the information requested.

UK: Clackmannanshire, East Ayrshire, East Dunbartonshire, South Ayrshire and South Lanarkshire.

Only four councils in Scotland pay an average price above UKHCA's Minimum Price for Homecare of £15.74 per hour (see page 10): Inverclyde, Aberdeen and West Lothian are relatively urban areas, compared to Highlands, where the council's rate may be recognising the additional careworkers' travel time associated with large geographic areas.

Councils for the Orkney Isles and Shetland Isles confirmed that they did not purchase homecare services from the voluntary or independent sectors.



Please see the following page for the table showing the lowest, average and highest rates paid in Scotland.

Scotland (cont)

Authority	Lowest Price	Average Price	Highest Price	Hours of Care
Aberdeen	£13.84	£17.27	£18.98	277
Aberdeenshire	£12.25	£13.81	£15.10	5,096
Angus	£13.13	£13.67	£14.43	913
Argyll & Bute	£11.00	£15.01	£16.80	6,106
Clackmannanshire	£10.78	£11.69	£21.14	5,130
Dumfries & G'way	£11.70	£13.03	£18.68	19,170
Dundee	£11.98	£13.71	£15.50	7,078
East Ayrshire	£11.56	c. £11.58	£11.61	6,804
E Dunbartonshire	£10.94	£12.05	£15.90	6,354
East Lothian	£13.54	£14.81	£18.48	9,858
E Renfrewshire	£11.96	c. £13.82	£16.25	..
Edinburgh	£12.28	£15.10	£19.95	26,446
Falkirk	£11.96	£15.13	£23.56	1,607
Fife	£12.08	£14.63	£17.96	9,101
Glasgow	£11.03	£12.82	£16.02	55,443
Highland	£15.24	£15.97	£18.80	4,495
Inverclyde	£18.22	£22.01	£25.00	3,112
Mid Lothian	£12.75	£14.15	£16.68	5,881
Moray	£12.49	£14.00	£16.65	9,438
Na h-Eileanan Siar	£15.00	£15.70	£17.50	31
North Ayrshire	£11.35	£12.49	£15.75	8,931
N Lanarkshire	£11.98	£12.51	£12.76	14,653
Perth & Kinross	£14.07	£14.07	£14.07	6,194
Renfrewshire	£12.79	£13.49	£15.36	5,418
Scottish Borders	£12.30	£13.27	£15.76	3,658
South Ayrshire	£12.00	£12.46	£13.14	9,515
S Lanarkshire	£10.10	£11.78	£13.46	9,491
Stirling	£12.36	£14.24	£18.06	6,564
W Dunbartonshire	£12.99	£15.43	£18.62	..
West Lothian	..	£15.83	£27.72	10,234

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Use of freedom of information legislation

UKHCA contacted the 211 local government bodies with responsibility for commissioning social care for older people (ie. every local authority in Great Britain and the five Health and Social Care Trusts in Northern Ireland) with a request for a consistent dataset using the Freedom of Information Act 2000 and the Freedom of Information (Scotland) Act 2002.

The questions asked

We asked authorities to provide the prices paid to independent and voluntary sector homecare providers for the provision of regulated social care services delivered to people aged 65 years or above in their own home, over a 'reference period' of Monday 8th to Sunday 14th September 2014, inclusive, as follows:

- a. The lowest rate per hour paid to any individual provider;
- b. The highest rate per hour paid to any individual provider;
- c. The average ("arithmetic mean") price per hour paid to all providers for all hours of homecare services purchased;
- d. The total hours of care purchased from all providers during the reference period.

The guidance we offered

The following guidance was provided to assist councils select the correct data-sample to complete the request. In cases of doubt, the authority was asked to apply a 'common sense' interpretation to the request.

The authority was asked to **include** the following:

- Services delivered to adults aged 65 years and above;
- Services which are primarily designed to provide personal care and support, including prompting to undertake such activities.

The authority was asked to **exclude** the following items:

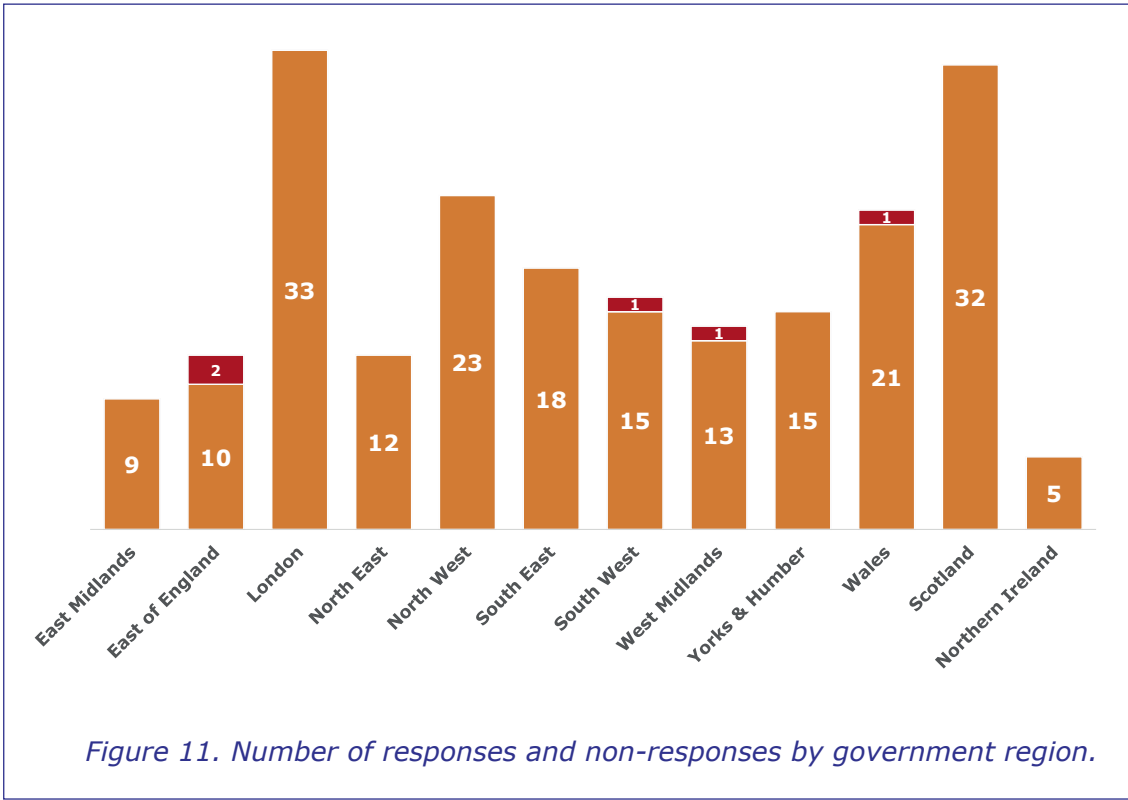
- Services provided to adults under 65 years of age;
- Services provided primarily to support people with a learning disability or a physical disability;
- Services which are charged by reference to a unit price, other than a price per hour (or part thereof);
- Direct payments made to people in lieu of the provision of services by the council;
- Services provided by any "in-house" homecare team, where the workforce is employed by the authority itself.

Sample size

In total 206 (98%) authorities responded to our request for information out of a total of 211 identified. A summary of the number of councils responding is provided in figure 11.

Non-responders

Five (2%) authorities had not replied within 40 working days of our original request, despite having received a subsequent reminder following our original request. This is twice the time permitted by freedom of information legislation. These organisations are named in Appendix 2.



Authorities' speed of response

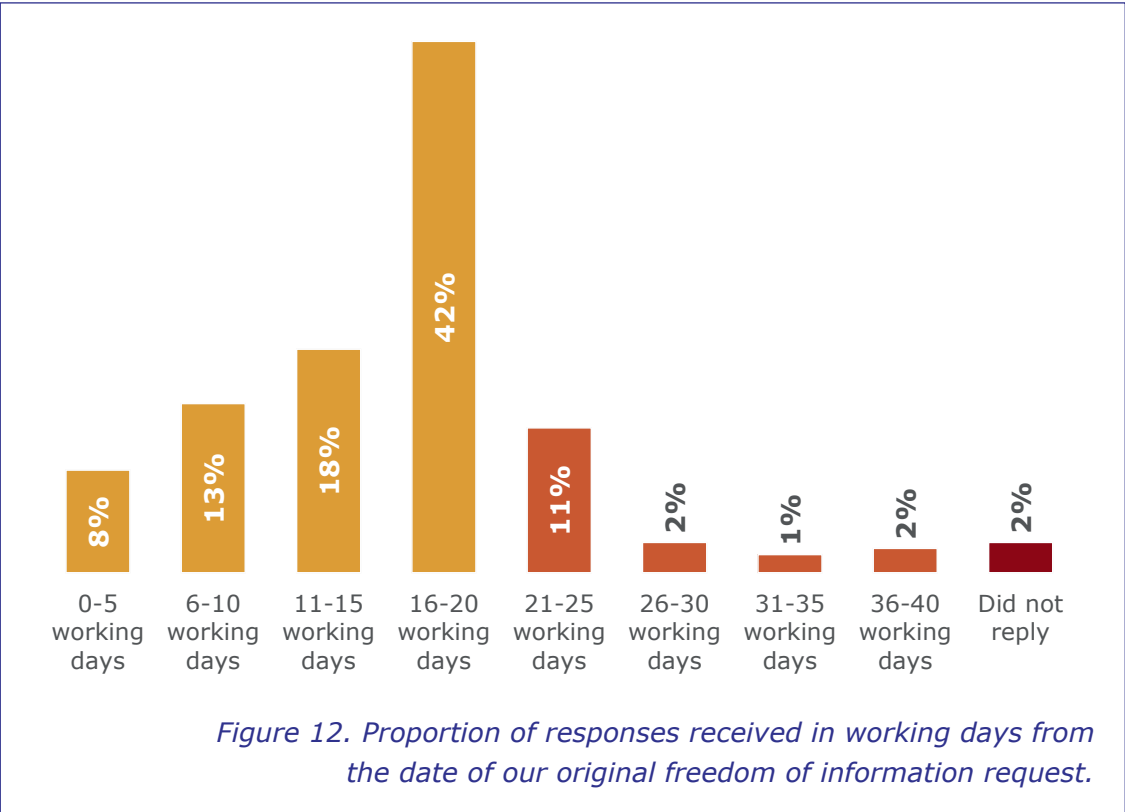
Each public body was sent the original freedom of information request by electronic mail and recorded delivery mail. 170 (81%) of authorities responded within the 20 working day deadline specified in the legislation.

After 20 working days the remaining public bodies were sent follow-up requests, with a further 36 (17%) responding (in one case 40 working days after the original request).

The average response time to our request was 16 working days (median 17 working days).

Figure 12 summarises the response rate in working days from our original request to each council, excluding two further responses received outside this timescale.

We acknowledge, with thanks, all those councils who supplied information promptly and with complete answers.



How we analysed the data

Overall approach

We analyse the data as supplied by each authority as it was reported to us under freedom of information legislation. Where we found a significant 'outlier' – data which appeared to be well-outside expected range – we offered the authority the opportunity to correct their original submission. In many cases the authority did so.

Our calculations of national and regional data were based solely on the data supplied by authorities, excluding incomplete responses, where necessary.

Completeness of responses

The vast majority of public bodies responding provided the four items of data requested, as illustrated in figure 13.

27 authorities were unable to supply the data requested, generally on the grounds that they did not hold all of the data requested, or that the information was commercially sensitive.¹ These councils are listed in Appendices 1 and 3.

Missing data

For the purposes of illustration in this report, and for the infographics we produced for social media, we have occasionally needed to supplement the data received from the authorities with information obtained from a similar freedom of information enquiry

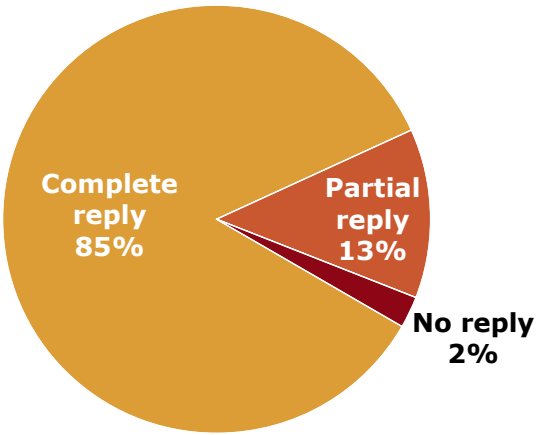


Figure 13. Proportion of complete and partially complete responses.

undertaken a few months before ours (see page 54).

We have also estimated some figures using data from other sources or by reference to the main data in our sample. These additions to our sample are indicated by the prefix "c." ("circa" – "approximately") before numerical figures in the rate tables published in this report. These items of data are presented for completeness of reporting, but have not been used in our other calculations.

Average price and weighted average price

Where we specify an "average" price for an individual authority, we are reporting the "arithmetic mean" value, supplied directly by the authority.

Where we refer to a "weighted average" within a UK administration or government region, we have calculated this in order to provide a figure which takes into account the different volumes of care that each individual authority in that administration or region purchases.

¹ Three of these authorities did not purchase from the independent and voluntary sector

Appendix 1. Authorities which do not purchase from the independent or voluntary sector

We are grateful to the following councils who kindly responded to our request, but confirmed that they do not purchase services from the independent or voluntary sector:

- Isles of Scilly
- Orkney Islands
- Shetland Islands

Appendix 2. Authorities which failed to respond to our enquiry within 40 working days

Five authorities had not responded to our enquiry within 40 working days of the original request - twice the time permitted under Freedom of Information legislation and well after the majority of the analysis of data in this report had been completed:

- Bristol (No response received)
- Luton (Received after 47 working days)
- Milton Keynes (Received after 45 working days)
- Rhondda Cyon Taff (Received after 54 working days)
- Walsall (Received after 43 working days)

We have used our best endeavours to include data from these councils in our report for completeness, despite this having added considerably to our workload.

Appendix 3. Authorities providing incomplete responses

Twenty-four authorities replied to our freedom of information request, but did not supply all the information requested. Where we were able to make reasonable estimates (or supply data from other sources with reasonable confidence) in this report, we have done so.

Incomplete response on grounds of commercial sensitivity

Commercial sensitivity is a valid reason to decline to respond under Freedom of Information legislation;¹ the following authorities declined to provide some of the information requested:

- Croydon
- Devon
- Kirklees
- Manchester
- Nottingham City²
- Powys
- Surrey
- Warrington

We are grateful to those authorities which, while using this exemption, appear to have provided a considered approach to the public interest test.

¹ See: <https://ico.org.uk/for-organisations/guide-to-freedom-of-information/refusing-a-request/>

² Nottingham City Council eventually provided a complete set of data 57 working days after our original request, once the majority of this report had been produced.

Incomplete response on the grounds of not holding the data requested

- Ceredigion
- Cornwall
- Derby
- East Ayrshire
- Monmouthshire
- North Lincolnshire
- Stockton on Tees
- Sunderland
- West Dunbartonshire
- Wiltshire

Incomplete response on grounds of exceeding the cost limit

This can be a valid reason for declining to supply information under Freedom of Information legislation. However, we are surprised to see this rationale being used for the relatively straightforward data requested:

- Windsor & Maidenhead
- Redcar & Cleveland

Other reasons

- East Renfrewshire
- Kent
- North Tyneside
- West Lothian

Hazlewoods LLP

Hazlewoods kindly supplied additional data to UKHCA’s Freedom of Information Act inquiry, having conducted a similar request to councils in England earlier in the year. The Healthcare Team at Hazlewoods had made this request given the fact that they act for a significant number of domiciliary care providers, for whom data on rates and increases is useful.

Hazlewoods provide advice to clients on accounting, tax planning (personal and corporate) and business strategy/planning for exit, backed by our detailed knowledge of the sector in which you operate. This knowledge of the sector allows us to understand really well how to minimise tax bills now, what a business needs to be attractive to prospective acquirers, and how to minimise tax liabilities on sale.

The Healthcare Team acts for around 250 clients from an accounting and tax perspective, having specialised in the sector for over 20 years. In addition, Hazlewoods are well known by many of the Corporate Acquirers and Private Equity houses. Being so well recognised in the sector means that we know what the drivers are, what the trends are, and how to really add value to your business.

To discuss Hazlewoods services please contact:

Andrew Brookes, Head of Healthcare,
Hazlewoods, Windsor House, Bayshill Road,
Cheltenham, GL50 3AT.
E-mail: andrew.brookes@hazlewoods.co.uk
Telephone: 01242 237661

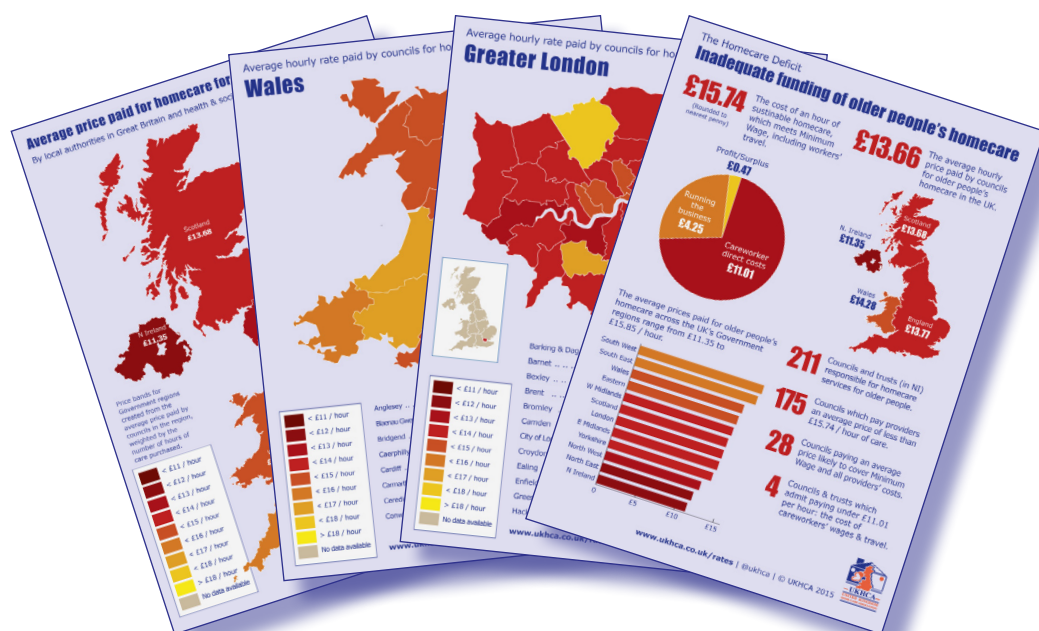


Our thanks also go to

UKHCA would particularly like to acknowledge the following contributions:

- The significant number of councils who responded to our enquiries with complete information in a timely manner.
- Members of UKHCA’s Provider Reference Group, who helped develop UKHCA’s Costing Model, or assumptions for our Minimum Price for Care and who provided constructive comment on the design of this enquiry.
- Jonathon Holmes, Policy Officer at UKHCA, who managed the dispatch and collation of over 200 separate Freedom of Information enquiries which produced this national overview.

Infographics from this report



A range of high-resolution infographics presenting findings from this report at national and regional level are available from www.ukhca.co.uk/rates.

If you have particular needs which make it difficult for you to read this document, please contact 020 8661 8188 or accessibility@ukhca.co.uk and we will try to find a more suitable format for you.

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