

NOTICE OF MEETING

CABINET MEMBER SIGNING

**Tuesday, 15th March, 2016, 4.00 pm - Civic Centre, High Road,
Wood Green, N22 8LE**

Members: Councillor Jason Arthur (Chair)

Quorum: 1

1. **FILMING AT MEETINGS**

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2. **URGENT BUSINESS**

The Cabinet Member will advise of any items they have decided to take as urgent business.

3. **HARINGEY'S DISCRETIONARY HOUSING PAYMENTS POLICY FOR 2016/17 (PAGES 1 - 32)**

The report will seek Cabinet Member approval for Haringey's Discretionary Housing Payments Policy 2016/17. The Cabinet Member will also be asked to note the changes to the policy in 2016/17, following the review of the Discretionary Housing Payments policy.

4. THE HARINGEY SUPPORT FUND (PAGES 33 - 52)

The report will seek Cabinet Member approval to delegate authority to the Chief Operating Officer to draw down from the remaining money held in reserves for Local Welfare Assistance in order to increase the capacity of the Homelessness Prevention Fund to address emergency needs and prevent homelessness and to support the development of a local approach to preventing crisis and supporting financial resilience.

5. NEW ITEMS OF URGENT BUSINESS

To consider any new items of urgent business admitted under Item 2 above.

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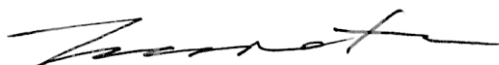
Bernie Ryan
Assistant Director – Corporate Governance and Monitoring Officer
River Park House, 225 High Road, Wood Green, N22 8HQ

Date: 7th March 2016

Report for: Cabinet Member Signing, 15th March 2016

Item number: 3

Title: Haringey's Discretionary Housing Payments Policy for 2016/17



Report

Authorised by: Tracie Evans, Chief Operating Officer

Lead Officer: Amelia Hadjimichael Head of Benefits

Ward(s) affected: All

Report for Key/

Non Key Decision: Key

1. Describe the issue under consideration

1.1 Each year the Department for Work and Pensions makes grants available to local authorities for Discretionary Housing Payment purposes.

1.2 Discretionary Housing Payments (DHPs) are administered by local authorities and provide financial assistance (outside of the Housing Benefit and Universal Credit regulations) to help tenants meet their housing costs. They can play an important role in sustaining tenancies, preventing homelessness and, where needed, enabling tenants to move to more affordable accommodation.

1.3 As part of the report on local welfare assistance presented to Cabinet on 19th January, it was agreed that the Council would review and update its DHP policy by the end of 2015/16 to take account of the Local Government Financial Settlement allocation and the changes that are due to come in through the Welfare Reform and Work Bill. The report noted that as part of this review we would take steps to ensure that systems are in place to deliver support in line with agreed policies in a fair and consistent manner.

1.4 In 2015/16 the Council's DHP grant was reduced by 40%. The Council's DHP allocation for 2016/17 is £1,726,627 – a 16.2% increase on 2015/16. However, welfare

reform changes due to come in during 2016/17 are expected to greatly increase the demands on Discretionary Housing Payment funds for transitional support.

1.5 The purpose of this report is to recommend the annual approval of a Discretionary Housing Payments Policy. The policy, at Appendix A will ensure that, during 2016/17 limited DHP resources are used in a way that is not only fair but also supports those households that are in most need of assistance.

2 Cabinet member introduction

2.1 Welfare reform continues to make the lives of Haringey's low paid families much harder. As the report notes, proposed welfare changes due to take effect in 2016/17, including the lowered benefit cap and a freeze in working age benefits, will significantly reduce the amount of Housing Benefit paid to households that are living in Haringey and/or in temporary accommodation. Such reforms will put significant pressure on Haringey's DHP budget in addition to the ongoing impact of previous welfare reform.

2.2 It is clear that a 16% increase in our DHP allocation will be insufficient to meet the scale of demand especially at a time when the Council's budget continues to be hit by the Government's austerity programme. In the face of these challenges it is important that our DHP budget is aligned with an overall more strategic approach to welfare reform focussed on increasing financial resilience and reducing demand for crisis support. With the resources at our disposal, Haringey will ensure that the DHP policy for 2015/16 is administered in a fair and transparent way. We remain committed to doing everything we can to sustain tenancies, prevent homelessness and, where possible, ensure tenants secure more affordable accommodation.

3 Recommendations

3.1 It is recommended that the Cabinet Member for Resources and Culture:

3.2 Approves Haringey's Discretionary Housing Payments Policy 2016/17 (see Appendix A) as the means by which the Council will determine how the DHP funds will be allocated during the 2016/17 financial year having regard to the Equalities Impact Assessment (set out in Appendix B)

3.3 Notes recommended changes to the policy for 2016/17 taking account of the review of DHP policy as follows:

I) Reprioritised objectives of the policy to emphasize that funds are used in a preventative way towards homelessness and sustain tenancies in correlation with the Council strategy. (Para 6.11)

II) Emphasis to be placed on the contribution that applicants need to make to their rent shortfall, with a reasonable underlying principle that all claimants make some contribution unless there is a clear reason why they should not do so. (Para 6.12)

III) Strengthened conditionality as set out in the policy to be monitored to ensure consistency. The service will monitor any set conditions given to a household; this will be

taken in consideration in determining future awards, which may result in withdrawal of the DHP. (Para 6.17)

3.4 Notes recommended proposals for introducing improved monitoring of the outcomes of the DHP policy during 2016/17 (Para 6.23 and 6.24)

3.5 Notes recommended proposals to ensure our DHP procedures align with our overall strategic response to welfare reform (Para's 6.19 to 6.21 and Para 7)

4 Reasons for decision

4.1 The DHP Policy has to be reviewed each year.

4.2 Changes to the policy for 2016/17 are being proposed to ensure the policy aligns with the Council's strategic approach to welfare reform as set out in a report to Cabinet on 19th January and to improve the fairness and consistency of the policy.

4.3 Changes to the procedures which underpin the policy are proposed to ensure the policy aligns with the Council's strategic approach to welfare reform and is able to respond to increased demand arising from further welfare reform in 2016/17.

4.4 Changes to monitoring arrangements are proposed to ensure that the policy is delivered in a fair and consistent manner and supports the policy aims outlined in this report.

5 Alternative options considered

5.1 Consideration has been given to the option of continuing with Haringey's existing Discretionary Housing Payment Policy. The policy needs to be reviewed each year in line with the new allocation of funding and as such this option was not viable. Taking account of welfare changes due to come in during 2016/17 it was deemed appropriate to review the way applications are dealt with in order to take into account the substantial increase in demand for DHPs, the severe impact that welfare changes are having on many households, and the need for the Council to use its limited resources fairly and efficiently.

5.2 In the course of developing Haringey's DHP Policy for 2016/17, officers have considered a wide range of options, including which claimants should be awarded priority and under what circumstances and what conditions should be attached to the award of a DHP – but have always been mindful of the fact that the Council must not limit its discretion and the need to consider all applications (including those that are not listed as a priority) on their individual merits.

6 Background information

6.1 Discretionary Housing Payments (DHP) are short-term awards provided by local authorities to help people with housing costs. They can play an important role in sustaining tenancies, preventing homelessness and, where needed, enabling tenants to move to more affordable accommodation. They are increasingly being used to assist those affected by welfare reform.

6.2 A Council's decision to award a DHP is discretionary but it must be made in accordance with the regulations which cover DHPs (the Discretionary Financial Assistance Regulations 2001) and with the ordinary principles of good decision-making i.e. administrative law. In particular, local authorities have a duty to act fairly, reasonably and consistently. The Discretionary Housing Payment policy should support the decision-making process, enabling fair and consistent decisions to be made across the year.

6.3 Discretionary Housing Payments are not intended to be used as a long-term solution to a claimant's financial difficulties but provide short-term assistance to ease transitions and allow households time to find a way of resolving their difficulties.

6.4 Our allocation for 2016/2017 is £1,726,627 as confirmed in Subsidy Circular- HB S1 2016. This is a 16.2% increase on our funding allocation in 2015/16. The Government has increased the DHP allocation nationally in line with proposed changes within the Welfare Reform and Work Bill which will increase the need for transitional support for those affected by changes. The DHP policy has been updated to reflect this new funding allocation (page 1 Appendix A). The policy now also notes the Council's ability to top up the fund by a total of 150% of its allocation (page 1 Appendix A).

6.5 It is difficult to get an accurate model for how further welfare reform changes will impact on future demand for DHP. However, our welfare reform impact analysis has identified that proposed changes will put additional pressures on residents' ability to meet their rent commitments beyond the pressures arising from existing welfare reform and the ongoing impact of the private sector housing market. This includes:

I) A freeze on working age benefits including the LHA rate impacting from April 2016 - An additional 1700 private tenants would be affected by the LHA cap if rents in Haringey continue to increase at current rates with an average weekly shortfall of these households of £55 per week

II) Extension of the benefit cap impacting from autumn 2016 – 1571 new households affected by the cap and existing capped households would be further capped. The average weekly shortfall of all capped households will be £76.78.

III) Extension of the LHA rate to new tenancies impacting on rent from April 2018 – 1112 households in the social rented sector currently pay rent above the applicable rate. The average difference between their monthly rent and their applicable LHA rate is £167.44 per month

6.6 Haringey's current DHP policy was approved through Cabinet Member signing in March 2015. The Revenue and Benefits service has completed a review of the Discretionary Housing Payments policy aimed at ensuring the policy is delivered in a fair and consistent manner. The review has drawn on a range of evidence including service monitoring data and a recent cumulative impact analysis of proposed welfare reform changes. The review has considered a number of aspects of the existing policy including prioritisation of DHP resources, the length of awards, the size of awards and the use of conditionality.

6.7 Changes to the Policy for 2016/2017 (Para 3.3)

6.8 The Council's Discretionary Housing Payments policy must be an aid to fair and consistent decision-making on awards but at the same time offer sufficient flexibility so as not to fetter the Council's discretion. The review concluded that our existing DHP policy by and large does provide this framework but that changes to some areas of the policy would help to improve consistency and fairness in decision-making and align our policy with a more strategic and preventive approach to welfare reform.

6.9 The first change we are proposing to the existing policy is to reprioritise the objectives of the policy to emphasize that funds are used in a preventative way towards homelessness and sustain tenancies in correlation with the Council strategy.

6.10 Currently the majority of DHP support goes to households affected by the benefit cap, especially those with a large shortfall in rent and those in temporary accommodation, with 77% of DHP awards (and three quarters of funding) going to capped cases. This reflects the significant impact of the cap compared to other welfare reforms. The circumstances of applicants, and in particular their vulnerability, also plays a considerable part in award decisions, which is consistent with the aims of the policy. (Para 3.3, I)

6.11 However, given the significant demands on our front door services as a result of homelessness and the limits of our homelessness prevention budget to address the quantum of need, it is important that DHP funds do more to support our broader aims around homelessness prevention. It is therefore proposed that there is greater alignment in the use of DHP funds with homelessness prevention funds and development of a more collaborative decision-making mechanism between benefits and the housing service.

6.12 The second area of change to the existing policy is around the size of awards made to applicants. Amendments have been made to the policy for 2016/17 to emphasise is that applicants need to make a greater contribution to their rent shortfall, unless there is a clear reason why they should not do. (Page 2 of policy Appendix A)

6.13 The key reason for this change is in order to improve the consistency of award of DHP. The existing DHP policy notes that the amount awarded may be below the difference between the rental liability and payment for Housing Benefit/Universal Credit and that assessment will take account of the size of any shortfall that exists and the financial circumstances of the claimant and others within their household. The policy also notes that all other options available to a claimant, including reducing household expenditure, will be taken into account when the Council assesses the merits of an application. However, there is a current inconsistency in the rent shortfall covered for different applicants, with benefit capped cases likely to be getting their entire rent shortfall covered whilst other applicants do not. (Para 3.3, II)

6.14 This aspect of the policy will also need to link to our overall strategy for improving financial resilience, looking to reduce reliance on forms of crisis assistance.

6.15 The third area of proposed change to the existing policy is around reference to conditionality

6.16 There has been an ongoing inclusion of conditionality in the policy to make it clearer to claimants what the outcomes could be if they do not adhere to conditions around their

award, such as engaging in work programmes. Conditionality is ultimately about improving the resilience of claimants and ensuring that they are taking responsibility for resolving their situation to reduce long-term reliance on welfare assistance. It is therefore a key part of a more preventive approach to welfare reform and must be used robustly and consistently

6.17 The existing policy notes that failure to meet the conditions stated in the award may lead to initial reduction of up to 25% of the amount paid during the period of the award. This is amended in the policy for 2016/17 to note that the service will monitor any set conditions given to a household; this will be taken into consideration in determining future awards, which may result in withdrawal of the DHP. The reason for this amendment is to strengthen use of conditionality within the policy. In order to further emphasize the role of conditionality as part of a preventative approach to DHP the following wording has also been added to the policy 2016/17: (Para 3.3, III)

I) It is expected that the vast majority of people will have to face and resolve their difficulties with the understanding and support of their social landlords, Jobcentre Plus and the voluntary sector, without requiring a DHP in the long term. The Council understands that DHP has a vital role in providing short term assistance during periods of crisis and in giving vulnerable applicants adequate time to cope with changes, such as moving to a cheaper property, increasing income or decreasing expenditure.

II) DHPs may be conditional on a household taking reasonable steps to resolve their situation e.g. working with The Welfare Reform or Benefit Team to improve their employability skills and seek employment. If these steps haven't been taken, or actions recommended by The Welfare Reform or Benefits Team have not been followed without good reason, this will be taken into account in determining future awards. (Para 3.5)

Compliance with conditions has also been added as a factor that will be taken account of in deciding whether or not to award a DHP as follows

I) The extent to which the claimant has complied with previous conditions.

6.18 Aligning our DHP policy with a more strategic approach to welfare reform

We are recommending a number of changes to current procedures in 2016/17, to take account of proposed welfare reform changes and better align Discretionary Housing Payments with our overall strategic approach to welfare reform.

6.19 The DWP has made it clear that the DHP funding is not intended to replace lost benefits but to provide, instead, extra resources that local authorities can use to assist those most affected to adjust to a long-term affordable approach. Haringey's DHP policy emphasises that assistance is intended to be short-term, easing transitions and enabling claimants to find a way of resolving their difficulties with the ultimate aim of reducing reliance on crisis support. As such, the policy must operate in tandem with other support mechanisms, such as housing and employment advice, linking to our overall policy aims for early help and prevention.

6.20 On January 19th a report was brought to Cabinet which set out proposals for developing a more strategic approach to supporting those affected by welfare reforms. The paper highlighted a number of key principles for our approach going forward:

I) Our approach needs to maximise the use of our existing resources and ensure that financial assistance is more strategically targeted to have the maximum impact

II) If we are to improve the effectiveness of local support to those facing financial hardship then we need to strengthen collaboration across a number of services areas and with our partners

III) We need to develop a more preventive approach which develops resilience within our communities to welfare reform changes and reduces reliance on crisis support

6.21 Welfare reform changes proposed to take effect during 2016/17 are expected to have a significant impact on demand for financial assistance, including applications for DHP. There is some evidence that existing support mechanisms have been successful in reducing demands on DHP by resolving the presenting issues of DHP claimants. For example the Welfare Reform Team has helped to move 68% of capped cases off the cap. However, there are also a number of underlying factors which are barriers to us being able to resolve the housing and employment issues claimants are facing quickly and early engagement is crucial. In implementing the DHP policy in 2016/17, it is therefore proposed that:

I) Consideration is given to what resources are needed within support services to resolve the issues faced by DHP claimants and ease transitions to welfare reform, as part of our development of a more strategic approach to welfare assistance.

II) The Welfare Reform Team and Financial Inclusion Team work with the Benefits Team to develop a plan for early engagement with those affected by welfare reform changes. The cumulative impact analysis will be used to target resident communication and engagement.

6.22 Monitoring of our DHP policy in 2016/17 (Para 3.4)

6.23 Robust monitoring to be introduced and implemented by the service as outlined in the recommendation aligned with other Council Services to ensure refusals do not negatively impact elsewhere.

6.24 The review of the existing DHP policy has highlighted the key challenge in the implementation of a process that delivers consistency, fairness and supports the resilience of some of the most financially disadvantaged residents within the borough whilst enabling the Council to manage its resources in a difficult budgetary environment. It is recommended that the service introduces a monitoring process in order to more effectively track throughout the year the consistency and fairness of DHP decisions made, to enable the service to respond to key issues more effectively, and to ensure the policy is supporting our overall aims to develop a more preventive approach to welfare reform. It is recommended that this should cover some of the key areas focussed on within the review, including:

I) Use of conditionality

II) Types of claimants receiving DHP

III) Length of time on DHP

IV) The amount that applicants are required to contribute towards their shortfall

7 Contribution to strategic outcomes (Para 3.5)

The stated aims of the policy support a number of our corporate priorities, including:

- I) Sustaining tenancies and preventing homelessness
- II) Ensuring residents can find and keep good quality employment
- III) Supporting the vulnerable and elderly to live independent lives
- IV) Creating a fair and equal borough by tackling the underlying factors of poverty and disadvantage
- V) Early help and intervention

8 Statutory Officers comments Assistant Director of Corporate Governance, Equalities)

8.1 The Assistant Director of Corporate Governance has been consulted in the preparation of this report.

8.2 The Discretionary Financial Assistance Regulations 2001 (as amended) (“the Regulations”) provide the legal framework for Discretionary Housing Payments (DHPs).

8.3 The Regulations give the Council a very wide discretion to determine a local scheme for DHPs. However decisions must be made in accordance with public law principles and the duty to demonstrate fair, reasonable and consistent treatment between applicants. Further, the Council must not act in a way which ‘fetters’ its duty to properly exercise its discretion, and each case must therefore be considered on its own merits.

8.4 Given the discretionary nature of the scheme, the Council is able to change its priorities and amend its scheme accordingly.

8.5 In accordance with Article 7 of the Discretionary Housing Payment (Grants) Order 2001 the Council’s total expenditure on DHP cannot exceed the overall cash limit of two and a half times the government contribution. To award DHP above this level would be unlawful. Any unspent DHP funding must be returned to the DWP at the end of the financial year.

8.6 The Council’s Public Sector Equality Duty has been considered and an equalities impact assessment has been carried out.

9 Chief finance Officer Comments

9.1 Whilst DHP Grant Allocation to the Authority for 2016/17 is to increase from that received in 2015/16, this is only by circa £241,000 (i.e. from £1,485,882 to £1,726,627). It is still too early to determine the full anticipated financial impact of the on-going Welfare reform changes for the Authority, although this will be significantly greater than the increase in the DHP Grant, with any such additional cost falling on the Authority’s General fund. In one area alone (i.e. new benefit cap cases), an estimation based on the spend on capped cases in 2015, suggested a possible additional demand of £955,800 on DHP funds over the last 6 months of 2016/17.

9.2 Although some of the proposed measures outlined in the report around the requirement upon claimants to make additional contributions and conditionality will mitigate some of the overspend against the grant allocation, this is unlikely to be significant, and is still expected to be far exceeded by the added demand pressures.

9.3 A broader piece of work around financial resilience is to be undertaken in 2016/17 to assess the likely financial impact and the future resources required, which will be the subject of a separate report to SLT.

10 Equalities Officer comments

10.1 The Policy described in this report will be administered by the Council to provide financial assistance not covered by the Housing Benefit and Universal Credit regulations in order to help tenants at risk of homelessness to meet their housing costs. It is therefore an additional tool to enable the Council to play an important role in helping to sustain tenancy, prevent homelessness and where applicable, by helping tenants to move to more affordable accommodation.

10.2 Discretionary Housing Payments support some of the most vulnerable members of our communities, including disabled residents, care leavers, and families in financial difficulties – a high proportion of which share the protected characteristics. Any changes to this scheme therefore has a high relevance for our equalities duty. A full EqIA has therefore been completed in relation to the proposed changes and is attached as Appendix B to this report.

10.3 DHP funds will increase by 16% in 2016/17 but the increase is not anticipated to be sufficient to meet increased level of demand arising from proposed reforms in the Welfare Reform and Work Bill. The EqIA notes that the Council may have to decide to apply funds less generously and this is likely to have a financial impact on claimants which may impact on their ability to remain in their current home and/or on their disposable income. The EqIA proposes that claimants should continue to be signposted to relevant advice and support services in order to address the underlying issues relating to their claim.

10.4 The Council is proposing to put greater emphasis on conditionality within the policy during 2016/17 and to require all claimants to make some contribution to their rent shortfall unless there is a good reason why they should not do so. This may have a disproportionate impact for some groups with the protected characteristics as they may face greater barriers to resolving the underlying issues affecting their claim or may have greater difficulty managing on a reduced income. It is therefore noted that the decision-making process will still need to consider cases on their individual merits and will take account of individual circumstances, including the vulnerability of the claimant, in deciding what conditions to attach to awards and the size of the award.

10.5 The impact of the policy for protected groups will be closely monitored during 2016/17 to ensure that the policy is being implemented fairly and consistently for these groups.

11 Use of Appendices

11.1 Appendix A Haringey's Discretionary Housing Payments Policy 2016/17

11.2 Appendix B EQIA

12 Local Government (Access to Information) Act 1985



Discretionary Housing Payments Policy – 2016/17

Introduction

Discretionary Housing Payments (DHPs) are administered by the Council and provide financial assistance (outside of the Housing Benefit and Universal Credit regulations) to help tenants meet their housing costs.

DHPs can play an important role in sustaining tenancies, preventing homelessness and, where needed, enabling tenants to move to more affordable accommodation.

DHPs may cover all or part of a shortfall in a tenant's eligible rent or provide the rent-in-advance and damage deposit a tenant may need in order to secure a tenancy. DHPs may be awarded as a one-off payment and/or as a series of payments.

To qualify for a DHP, the claimant must have a rent liability, require further financial assistance with their housing costs and have been receiving Housing Benefit or Universal Credit throughout the period for which they are claiming assistance.

Amount of funding available

The Department for Work and Pensions (DWP) makes grants available to local authorities for DHP purposes. In 2016/17, the total DHP grant budget (shared between all local authorities in England, Scotland and Wales) is £150 million – an increase of £25m from the previous year.

To help LAs manage the impact of the HB reforms announced in the Summer Budget 2015, the overall DHP funding will be £150 million for 2016/17, an increase of £25 million (20%) compared to 2015/16 funding. This comprises of funding for four separate areas of support; Core funding, Local Housing Allowance (LHA), Removal of the Spare Room Subsidy (RSRS) and Benefit Cap

The £150 million consists of a core amount of £20 million, a Benefit Cap allocation of £40 million, a Social Rented Sector Size Criteria ('bedroom tax') allocation of £60 million and a Local Housing Allowance Reforms allocation of £30 million.

Haringey's share of this £150 million grant is £1,726,627, broken down as follows:

Core amount	£207,195.24	Estimated
Benefit Cap	£863,313.50	Estimated
Social Rented Sector Size Criteria	£414,390.48	Estimated
Local Housing Allowance Reforms	£241,727.78	Estimated
Total	£1,726,627	Actual

The Council needs to consider how to allocate these limited DHP resources in a way that is not only fair but also supports those that are in most need of assistance. It is expected that from autumn 2016 five times as many households could be affected by the benefit cap extension. The Council has the ability to top up the fund by up to 150%.



Haringey's DHP scheme

Welfare reform is aimed at encouraging people to move into work, increase their working hours and/or move to more affordable accommodation.

Although it is hoped that many people will be able to address and resolve their difficulties without the need for a DHP, the Council recognises that DHPs have an important role to play in providing tenants with short term assistance to ease transitions and allow households time to find a way to resolve their difficulties.

The overriding principles of Haringey's DHP scheme are as follows:

- To prevent homelessness and to sustain tenancies;
- All claimants will be treated fairly;
- It is expected that applicants make a contribution to their rent shortfall, unless there is a clear reason why they cannot do so;
- All DHP applications will be assessed on their individual merits (which includes, where relevant, considerations of equality);
- All of the options available to the claimant (including, for example, reducing household expenditure, maximising income, securing employment and/or moving to alternative, less expensive accommodation) will be taken into account when the Council assesses the merits of each application; and
- **In order to be awarded a DHP, claimants must be able to show that their circumstances are exceptional.**

Examples of the shortfalls that DHPs may cover

The Council is not required to spend its overall grant allocation in any particular way, despite the DWP breakdown already referred to. It is a matter for its discretion.

The types of shortfall that a DHP may cover include the following:

- Reductions in Housing Benefit or Universal Credit, resulting from the application of the Benefit Cap;
- Reductions in Housing Benefit or Universal Credit, resulting from the under-occupation of social rented housing;
- Reductions in Housing Benefit or Universal Credit, resulting from Local Housing Allowance restrictions, including the Shared Accommodation Rate;



- Reductions in Housing Benefit or Universal Credit, resulting from non-dependant deductions and the use of income tapers;

What DHPs cannot cover

For the purposes of a DHP, the following elements of a claimant's rent cannot be included in their claim for housing costs because the regulations exclude them:

- Ineligible service charges
- Increases in rent that are due to outstanding rent arrears; and
- Certain sanctions and reductions in Benefit
- Council Tax liabilities incurred under the 2013 onwards Council Tax Reduction scheme

Objectives of this DHP policy

The Council will consider making a DHP award to applicants who meet the qualifying criteria. Assessing all applications on their individual merits, it will consider the extent to which the financial assistance requested will meet the Council's objectives of:

- Sustaining tenancies and preventing homelessness;
- Safeguarding Haringey residents in their own homes;
- Encouraging and sustaining people in employment;
- Helping people who are trying to help themselves;
- Keeping families together;
- Supporting victims of domestic violence to move to a place of safety
- Supporting the vulnerable and elderly in the local community;
- Helping customers through personal and difficult events;
- Supporting young people in the transition to adult life; and
- Promoting good educational outcomes for children and young people.
- Alleviating poverty;



Support for households affected by welfare reform

DHPs are not generally intended to be used as a long term solution to the claimant's financial difficulties. Instead, they should be used to provide short term assistance to ease transitions and allow households time to find a way of resolving their difficulties.

All applications will be assessed on their individual merits. However, when considering applications, the Council will take into account not just the cash limitations of what remains in the DHP budget but also the extent to which a DHP can help the claimant to overcome temporary difficulties and, if possible, enable them to secure paid employment and/or move to alternative accommodation that they can afford.

The expectation is that DHPs will be awarded in unusual or extreme circumstances where additional help with the current rent will have a significant effect in reducing the risk of homelessness, alleviating hardship, or alleviating difficulties that may be experienced in the transition from long term benefit dependence into work.

At the discretion of the Council, conditions may be attached to a DHP award, requiring the claimant (for example) to participate in a training or employment programme that will improve their prospects of securing paid employment. Other conditions may be attached to the DHP to encourage behaviour change and achieve an early resolution of the claimant's difficulties.

It is expected that the vast majority of people will have to face and resolve their difficulties with the understanding and support of their social landlords, Jobcentre Plus and the voluntary sector, without requiring a DHP in the long term. The Council understands that DHP has a vital role in providing short term assistance during periods of crisis and in giving vulnerable applicants adequate time to cope with changes, such as moving to a cheaper property, increasing income or decreasing expenditure.

DHPs may be conditional on a household taking reasonable steps to resolve their situation e.g. working with The Welfare Reform or Benefit Team to improve their employability skills and seek employment. If these steps haven't been taken, or actions recommended by The Welfare Reform or Benefits Team have not been followed without good reason, this will be taken into account in determining future awards.



Households affected by the Benefit Cap

The purpose of the DHP funding is to provide short-term, temporary relief to mitigate the most severe effects of the Benefit Cap until a more sustainable solution is found.

Examples of the groups that are likely to be particularly affected by the Benefit Cap include (but are not limited to) the following:

- Homeless families living in temporary accommodation;
- Households that are moving to more appropriate accommodation;
- Families living in private rented accommodation;
- Individuals or families fleeing domestic violence;
- Individuals or families who cannot move immediately for reasons of health, education or child protection;

Given the limitations of the DHP budget– and on the understanding that the Council and its housing association partners will take all reasonable steps to provide homeless families with temporary accommodation that is not only suitable but has also been procured on terms that offer good value for money – the Council will give priority to DHP applications received from the following households:

- Homeless households that are residing in temporary accommodation (provided by, or on behalf of, Haringey Council) and have either been told, by the Council, that they will be able to remain in the accommodation / area or they are awaiting an offer of alternative temporary accommodation, procured at a lower cost;
- Homeless households that are residing in temporary accommodation (provided by, or on behalf of, Haringey Council) and have been assessed, by the Council, as being particularly vulnerable and needing to remain in the area;
- Homeless households that are residing in temporary accommodation (provided by, or on behalf of, Haringey Council) and are either awaiting the Council's decision on their homelessness application or have been notified that the Council's duty to provide temporary accommodation is being brought to an end;
- Households that need to move to alternative, lower cost accommodation but are unable to do so immediately (for reasons of health, education or child protection) and the provision of short-term financial assistance will contribute to the achievement of one or more of the Council's DHP policy objectives (see page 3);
- Households that need to move to alternative, lower cost accommodation but are working proactively to resolve their situation and the short-term award of a DHP will, in the opinion of Haringey's Welfare Reform Practical Support Hub, prevent



the household from becoming homeless or delay homelessness for long enough to enable them to complete a planned move to more affordable accommodation;

- Households that are living in social rented housing and are, in the opinion of Haringey's Welfare Reform Practical Support Hub, working proactively with Jobcentre Plus and advice / support providers to secure paid employment, claim Working Tax Credit and become exempt from the Benefit Cap.

All DHP applications will be assessed on their individual merits.

Households affected by the Social Rented Sector Size Criteria

The purpose of the DHP funding is to help those tenants who are unlikely to be able to meet the shortfall in the rent payments and for whom moving to a smaller property may be inappropriate or avoidable.

For claimants living in significantly adapted accommodation, it will sometimes be more cost-effective to allow them to live in their current accommodation rather than moving them into smaller accommodation which then needs to be adapted.

- Households that contain a person with a disability and are living in 'significantly adapted' accommodation;
- Households that contain a disabled child who is unable to share a bedroom because of their severe disabilities, where regulations do not allow for the extra bedroom;
- Households that contain a disabled child and are living in accommodation that has been adapted to meet the child's needs, where regulations do not allow for the extra bedroom;; and
- Households containing someone who has a severe and persisting disability which means that they are dependent on the care and support of relatives and friends who are living in the local community and there is no suitable accommodation available, within the local area, to which they are able to transfer.

Depending on the level of demand for DHPs, the Council may also give priority (albeit slightly less priority than is given to the households affected by the Size Criteria listed above) to DHP applications from the following households:

- Households whose Housing Benefit is restricted by the Size Criteria but that restriction will soon be lifted because the claimant (and their partner, if they have one) will reach the age at which they will be able to claim Pension Credit;
- Households whose Housing Benefit is restricted by the Size Criteria but that restriction will soon be lifted because one or more of their children will soon reach an age when they are not expected to share a bedroom;
- Single people who are pregnant (and childless couples containing a pregnancy) who are living in a two-bedroom home but whose Housing Benefit is restricted by



the Size Criteria to a one-bedroom home but that restriction will soon be lifted when the baby is born; and

- Households with exceptional need, which are actively and consistently engaging in seeking to downsize to accommodation that matches their need.

Other households requesting a DHP, including those that are affected by the Local Housing Allowance Reforms

The purpose of the DHP funding is to provide short-term, temporary relief to families and vulnerable people whose Housing Benefit or Universal Credit has been reduced, due to Local Housing Allowance restrictions (including any LHA Caps, the Shared Accommodation Rate and changes to the way in which LHA is calculated), income tapers and non-dependant deductions.

DHPs cannot assist with the council tax liabilities that residents incur under the 2013 Council Tax Reduction scheme, though a late request can be made for the Council to backdate a DHP claim that is based on the Council Tax Benefit awarded in 2012/13.

All DHP applications will be considered on their individual merits. However, the Council will give priority to applications from households for whom the Council will have a housing duty if they become homeless and households that have children and need to move to alternative, lower cost accommodation but are unable to do so immediately (for reasons of health, education or child protection).

Rent-in-advance, damage deposits and removals

The DHP budget is insufficient to meet the rent shortfalls of the many tenants whose Housing Benefit and Universal Credit will no longer cover their full rent.

In order to provide long term solutions, the Council will help and encourage tenants to move to alternative accommodation that they can afford.

Instead of providing tenants with short term assistance to enable them to maintain the rent payments on a home that they will never be able to afford without a DHP, the Council may decide that it would be better to help those tenants to move to somewhere they can afford, at a much earlier stage, by providing them with the help they require to pay the rent-in-advance, damage deposit and removal costs.

When considering DHP requests for such a purpose, the Council will take into account any damage deposit or rent-in-advance that is due to be returned to the claimants. It will also check that the claimant's new home will be affordable.



Assessment of applications

When deciding whether or not to award a DHP, the Council will assess each application on its merits (including considerations of equality) and take into account its objectives and such things as:

- The impact that not awarding a DHP is likely to have on the Council's finances and services, especially homelessness, social care, family support and health;
- The size of any shortfall that exists between what the claimant is receiving in housing costs (from Housing Benefit or Universal Credit) and the eligible housing costs for which they are liable, together with the reasons for this shortfall;
- The financial circumstances (income and expenditure, savings, capital and indebtedness) of the claimant, their partner and anyone else living in their home;
- Any special needs or health and social problems that the claimant and/or their family have, and what impact these have on their housing and financial situation;
- The impact that moving home and/or changing schools is likely to have on the family and the educational outcomes of any young people in the household;
- The reasons why, compared to other people, the circumstances of the claimant and their family should be considered 'exceptional';
- The length of time for which a DHP is being sought;
- Any steps the claimant has taken to reduce their rental liability;
- The nature of any contact the claimant has had with the Council's Welfare Reform Practical Support Hub;
- The amount of money remaining in the DHP budget; and
- Any other factors that the Council and/or claimant consider appropriate.
- The extent to which the claimant has complied with previous conditions.

The Council will not normally make allowance for any financial loss resulting from the claimant's failure to claim any benefits in a timely manner. No allowance will be made, either, for any debt relating to an overpayment of Housing Benefit.

When the Council has considered the claimant's needs and circumstances, it will decide how much to award. This may be any amount below the difference between the rental liability and payment for Housing Benefit / Universal Credit. The DHP award cannot exceed the weekly eligible rent for the claimant's home.



The award of a DHP does not guarantee that a further award will be made at a later date, even if the claimant's circumstances remain unchanged.

Claiming a DHP

The regulations require a DHP to be claimed.

In most cases, the person who claims a DHP will be the person who is receiving Housing Benefit or Universal Credit, or their partner. However, the Council may also accept a claim from someone who is acting on behalf of that person (such as an appointee or advocate) if the person is vulnerable and requires support.

The Council accepts DHP claims in writing and provides an application form for this purpose. A letter will also be accepted as a claim and may trigger a referral to Haringey's Welfare Reform Practical Support Hub.

A claim for a DHP will be considered from the date a DHP is requested, but on condition that all supporting information and documentation is received by the Council within one month of that request.

If the Council requires additional information and evidence to assess the claim, it will request this from the claimant in writing, electronically or verbally (over the telephone, face to face or by visit). The claimant must provide this information and documentation within one month of the date of the request.

If the claimant fails to provide the information and documentation on time, the Council will make a decision based on any information it already holds, including the information held on its Housing Benefit computer system. More time may be allowed for some individuals, however, if the Council thinks it is reasonable to do so.

Period of award

The Council will decide on the length of time for which a DHP is to be awarded.

The start date for an award will normally be the Monday following receipt of the claim. However, the Council does have the discretion to backdate an award for DHP if it considers that the applicant's circumstances merit this.

DHPs will normally be paid for a minimum of one week. The length of each award will be based on the individual circumstances of each claimant, but will take into account the date that the tenancy and/or notice period expires.

As an award can only be made for the current financial year, any award that is made for the remainder of 2016/17 will have to be followed by a new application for the next financial year even if the claimant's circumstances remain unchanged.



Although all claimants are entitled to make a fresh claim (for a further DHP) when their existing award comes to an end, the Council will not automatically invite claimants to apply for another DHP.

As DHPs will not usually be regarded as offering a long term solution to a claimant's financial situation, the maximum length of a DHP award (or a series of consecutive awards) will not normally exceed 12 months. Exceptions may be made, in particular for certain claimants affected by the Social Rented Sector Size Criteria and where the Council continues to regard it as inappropriate for the claimant to have to move.

Failure to meet the conditions stated in the award notification or to demonstrate a valid reason why the set conditions could not be met, will lead to the withdrawal of any DHP award.

Request for backdating

The Council will consider any reasonable request for backdating a DHP award. However, these will be limited to the period in which the claimant has been receiving Housing Benefit or Universal Credit and, except where the DHP relates to council tax liabilities arising before 1 April 2013, they will be limited to the current financial year, unless exceptional reasons for a late claim are accepted.

Making a claim in advance

A DHP can only be considered for a period when the claimant is entitled to Housing Benefit or Universal Credit.

However, claims can be made in advance, where the claimant is anticipating a change in their situation, such as the forthcoming imposition of the Benefit Cap and the Social Rented Housing Size Criteria.

Notification of decisions

The claimant will be notified, in writing, of the outcome of the DHP claim within 14 days of receipt of the claim and all supporting documentation, or as soon as possible after that.

If a claim is unsuccessful, the Council's decision letter will include an explanation of how the decision has been reached and details of the right of review.

If the claim is successful, the Council's decision letter will include the following:

- The reason for the award;
- The amount awarded;
- The period of the award;



- To whom the DHP will be paid;
- The claimant's duty to report any changes in circumstances and
- Any conditions associated with the award

Changes in circumstances

The claimant must tell the Council if their circumstances change after a DHP is awarded. This is made clear to claimants in the award letter and application form.

The Council may revise a DHP award if the claimant's circumstances have changed.

Payment arrangements

The Council will decide whether the DHP should be paid to the tenant, the landlord or a third party. Rent-in-advance and deposits will normally be paid to the landlord.

Right to request a review

As a DHP is not a payment of Housing Benefit or Universal Credit, it is not subject to the appeals process that operates under those schemes.

Claimants can request a review of a decision to refuse to award a DHP, a decision to award a reduced amount, a decision not to backdate an award for DHP or a decision to seek recovery of an overpayment of a DHP as follows:

- A claimant (or their representative) who disagrees with a DHP decision may request a review. This request must be made in writing, within one month of when the notification was issued, and set out the reasons for requesting a review. (The time limit for requesting a review may be extended if the Council considers it reasonable to do so).
- A DHP Review Panel, will review all of the evidence held and will make a decision within 14 days or as soon as possible after that.
- If the DHP Review Panel decides to change the original decision – perhaps because of new or additional information provided by the claimant – it will issue the claimant with a new decision notification.
- If the DHP Review Panel decides that the original decision was correct, the claimant will be notified of this in writing, with reasons for the Panel's decision.

The DHP Review Panel's decision will be final. In cases of alleged maladministration by the Council, the claimant should follow the Council's complaints process. If a claimant is still unhappy, they have a right to contact the Local Government Ombudsman.



Overpayments

The Council will make every effort to minimise overpayments of DHP.

If an overpayment does occur, the Council will decide whether or not it is appropriate to recover it. If recovery action is appropriate, the Council will send an invoice to the claimant (or the person to whom the DHP was made) and a written explanation of how the overpayment occurred and the periods and amounts to which it relates.

Where the overpayment is a result of an error made by the Council, recovery will not normally be sought, unless the claimant or person who received the payment could have reasonably known they were being overpaid.

DHP overpayments will not be recovered from payments of Housing Benefit and Universal Credit that are due to the claimant, but may be recovered from any future awards of DHP.

Fraud

The Council is committed to tackling and preventing fraud in all its forms.

If a claimant attempts to claim a DHP by making a false declaration or providing false evidence or statements, they may have committed an offence under the Theft Act 1968. Where the Council suspects that fraud may have occurred, it will investigate the matter as appropriate and this may lead to criminal proceedings.

Publicity

The Council has a responsibility to ensure that it does not limit the legal discretions it may apply, and it is committed to applying this policy fairly and consistently.

It will take steps to maximise take up to make sure that the funds are targeted towards those who are most in need. This policy will be made available on request and via the Council's website: www.haringey.gov.uk

Debt advice

Anyone experiencing debt problems will be signposted to local debt advice agencies (including the Citizens Advice Bureau) for free, confidential, impartial advice.

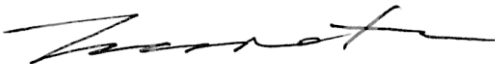
Policy review

This policy will be reviewed annually and in light of any legislative changes, trends or other factors that impact on its effectiveness.

The Council may also, during the course of any year, review and reconsider whether it should allocate any of its own resources towards the overall DHP budget.



Equality Impact Assessment

Name of Project	Haringey's Discretionary Housing Payment Policy 2016/17	Cabinet meeting date <i>If applicable</i>	15/03/2016
Service area responsible	Housing Benefits		
Name of completing officer	Amelia Hadjimichael	Date EqlA created	22/01/2016
Approved by Director / Assistant Director		Date of approval	07.03.16

The Equality Act 2010 places a 'General Duty' on all public bodies to have 'due regard' to:

- Eliminating discrimination, harassment and victimisation and any other conduct prohibited under the Act
- Advancing equality of opportunity between those with 'protected characteristics' and those without them
- Fostering good relations between those with 'protected characteristics' and those without them.

In addition the Council complies with the Marriage (same sex couples) Act 2013.

Haringey Council also has a 'Specific Duty' to publish information about people affected by our policies and practices.

All assessments must be published on the Haringey equalities web pages. All Cabinet papers MUST include a link to the web page where this assessment will be published.

This Equality Impact Assessment provides evidence for meeting the Council's commitment to equality and the responsibilities outlined above, for more information about the Council's commitment to equality; please visit the Council's website.

Stage 1 – Names of those involved in preparing the EqIA	
1. Project Lead	Amelia Hadjimichael / Angela Donnelly / Jim Brady
2. Equalities / HR	Kathryn Booth
3. Legal Advisor (where necessary)	Michelle Williams

Stage 2 - Description of proposal including the relevance of the proposal to the general equality duties and protected groups. Also carry out your preliminary screening (Use the questions in the Step by Step Guide (The screening process) and document your reasoning for deciding whether or not a full EqIA is required. If a full EqIA is required move on to Stage 3.

This EQIA accompanies a report seeking to approve a policy relating to Discretionary Housing Payment (DHP) Awards for 2016/17. The DHP policy will be administered by the Council to provide financial assistance not covered by the Housing Benefit and Universal Credit regulations in order to help tenants who are at risk of homelessness, to meet their housing costs. It is therefore an additional tool to enable the Council to play an important role in helping to sustain tenancy, prevent homelessness and where applicable, by helping tenants to move to more affordable accommodation. The policy is an integral part of how the Council will administer the Welfare Reform Act 2012 while at the same time ensuring that the most vulnerable are afforded effective protection and the impact on groups protected by the Equality Act are identified and mitigated.

Discretionary Housing Payments have been part of Housing Benefit administration for many years, but have taken a greater role in preventing homelessness following government Welfare Reform changes to major Housing Benefit Regulations, such as the introduction of Local Housing Allowance (Restriction on how much Housing Benefit can be paid to private tenants), the Benefit Cap (currently restricting the total amount of benefit that can be awarded to any individual to £350 per week for single people and £500 per week for others – these amounts are likely to change later in 2016), and the Social Sector Size Criteria (otherwise known as the Bedroom Tax – a restriction on Housing Benefit for tenants of Social Landlords, who have more bedrooms than they need).

The 2016/17 policy is a continuation of previous policy with slight variances to conditionality and strategic approach; however it is noted that the funds, whilst slightly increased from 2015/16, are a significant reduction on previous years. All claimants of housing benefit will be affected by this policy, therefore, all the characteristics protected by the Equality Act 2010 will be affected, however it is noted that some groups are more predominant in the benefits claimant population and are therefore more likely to be affected by this policy. These groups include Black and Minority ethnic groups, disabled people, pensioners, women (in particular single mothers), children in single parent households, unemployed people and homeless people / households in Temporary Accommodation. These groups will therefore require additional mitigating actions in light of their individual needs.

This is one of several other Haringey policies relating to the administration of the Welfare Reform Act (the others include the Council Tax Reduction Scheme, which was agreed by Full Council in November 2015 (for the 2016/17 Scheme). These were fully equality impact assessed to identify how they would impact

on existing benefits claimants who have the characteristics protected by section 4 of the Equality Act 2010 as well as other vulnerable groups such as homeless people not specifically identified in the Act. The results of those assessments show that although in each case, the reforms would impact on claimants in all protected characteristics, certain groups are at a higher risk of negative impact than others and mitigation for these groups was provided.

Stage 3 – Scoping Exercise - Employee data used in this Equality Impact Assessment

Identify the main sources of the evidence, both quantitative and qualitative, that supports your analysis. This could include for example, data on the Council's workforce, equalities profile of service users, recent surveys, research, results of recent relevant consultations, Haringey Borough Profile, Haringey Joint Strategic Needs Assessment and any other sources of relevant information, local, regional or national.

Data Source (include link where published)	What does this data include?
EqIA Profile on Harinet	Age, gender, ethnicity, disability information – for the Council and the Borough
Service Reports	<p>These reports are used by the Service to:</p> <ul style="list-style-type: none"> • Understand spend (actual and predicted) and the ongoing financial situation • Understand award periods and flag when awards are due to expire • Categorise award spend in terms of eligibility

Stage 4 – Scoping Exercise - Service data used in this Equality Impact Assessment

This section to be completed where there is a change to the service provided

N/A – there is no service change to the existing policy

Stage 5a – Considering the above information, what impact will this proposal have on the following groups in terms of impact on residents and service delivery:

Positive and negative impacts identified will need to form part of your action plan.

	Positive	Negative	Details	None – why?
Sex <ul style="list-style-type: none"> Both sexes will continue to be subject to the same eligibility criteria. The majority of claimants who will be affected are female, in particular lone female parents who are a predominant group of Housing Benefit claimants. These claimants may face greater barriers in terms of reducing reliance on DHP, for example due to childcare Single males are also an impacted group as they are more likely to have unsettled lifestyles and live in expensive private sector accommodation which cannot always be funded purely on Housing benefit and as such a rent top-up is requested from the DHP budget. 	N/A	Anticipated higher levels of demand for DHP in 2016-17 means that people will be more likely to be refused or restricted in the amount of DHP awarded to them. They will be financially impacted and this could have a direct impact on their ability to remain in their current home, and/or on their disposable income.	<p>Female claimants will continue to be signposted to the various appropriate women specific employment and skills development initiatives in the borough, in addition to generic programmes to help people into work e.g. Haringey Adult Learning Services (HALS) and the College of North East London (CONEL)</p> <p>Where appropriate there will continue to be targeted signposting in place for local groups offering support that is gender specific, via The Bridge Renewal Trust, Haringey Council's Strategic Partner for the Voluntary and Community Sector (VCS)</p>	N/A
Gender Reassignment <p>Housing Benefit applicants do not have to provide any details relating to gender reassignment. There is no evidence to suggest that gender reassignment has been a relevant factor in awarding DHPs nor will it be in the future</p>	N/A	N/A	N/A	N/A
Age <ul style="list-style-type: none"> Housing Benefit is restricted for single claimants aged under 35 who rent from a private landlord. Their benefit is restricted to the rate allowed for shared accommodation. As such they are more 	N/A	Anticipated higher levels of demand for DHP in 2016-17 means that people will be more likely to be refused or restricted in the amount of DHP awarded to them. They will be financially impacted and this could	It is recognised that certain people may find it difficult to find work due to their age; they will continue to be signposted to employment and re-skilling programmes that provide targeted support to find work. These include	N/A

<p>likely to claim additional funds from DHP.</p> <ul style="list-style-type: none"> Older people are more likely to be impacted by restrictions under Size Criteria rules as they may be living in the former family home and have more bedrooms than it is deemed necessary. This group are also likely to make claims for additional funds as a result of a restriction on their benefit. 		<p>have a direct impact on their ability to remain in their current home, and/or on their disposable income.</p>	<p>focused training provided by Haringey Adult Learning Services, CONEL and other Haringey based providers.</p> <p>Where people have been affected by multiple welfare reform changes (such as the CAP and the Size Criteria changes) they will continue to receive individual assistance including 121 interviews with colleagues from Housing Services and JobCentrePlus and direct referrals to support providers such as Money Wise Haringey or through The Bridge Renewal Trust, Haringey Council's Strategic Partner for the Voluntary and Community Sector (VCS)</p>	
<p>Disability</p> <p>People with disabilities are more likely to live on low incomes and be more likely to request assistance from the DHP budget. This protected group may be more likely to face barriers in reducing reliance on DHP, for example being unable to move property due to adaptations.</p>	N/A	<p>Anticipated higher levels of demand for DHP in 2016-17 means that people will be more likely to be refused or restricted in the amount of DHP awarded to them. They will be financially impacted and this could have a direct impact on their ability to remain in their current home, and/or on their disposable income.</p>	<p>Where restrictions are in place and yet there is a care need for an additional bedroom, applications are carefully considered.</p> <p>It is recognised that this group may find it difficult to find work and as such are supported appropriately in terms of employment and re-skilling programmes.</p>	N/A
<p>Race & Ethnicity</p> <p>Of those who have declared their ethnicity, evidence held suggests that people from minority ethnic backgrounds are more likely to live on low incomes and be more likely to request assistance from the DHP budget.</p>	N/A	<p>Anticipated higher levels of demand for DHP in 2016-17 means that people will be more likely to be refused or restricted in the amount of DHP awarded to them. They will be financially impacted and this could have a direct impact on their ability to remain in their current home, and/or on their disposable income.</p>	<p>Claimants will continue to be signposted to employment and skills training programmes to enhance employment opportunities, especially in the east of the Borough where there is a high concentration of BMEs and high levels of deprivation.</p> <p>Relationships have been built with local JobCentrePlus sites where claimants</p>	N/A

			can receive information about opportunities relating to both employment and skills development. There is also access to budgeting loans to help with any work related costs (such as clothing or equipment). These will continue going forward.	
Sexual Orientation Housing Benefit applicants do not have to provide any details relating to sexual orientation. The impact is unknown due to insufficient data.	N/A	N/A	N/A	N/A
Religion or Belief (or No Belief) Housing Benefit applicants do not have to provide any details relating to religious belief. The impact is unknown due to insufficient data.	N/A	N/A	N/A	N/A
Pregnancy & Maternity We do not collect information about claimants' maternity status so the full impact on this characteristic is not known, however we have used the data we hold to make a consideration of the impact. It is estimated that within the Housing Benefit group, pregnant women are more likely to live on low incomes and require larger accommodation; as such they are more likely to request assistance from the DHP budget.	N/A	Anticipated higher levels of demand for DHP in 2016-17 means that people will be more likely to be refused or restricted in the amount of DHP awarded to them. They will be financially impacted and this could have a direct impact on their ability to remain in their current home, and/or on their disposable income.	Where appropriate there will continue to be targeted signposting in place for those needing support with children through Childrens centres, The Bridge Renewal Trust, Haringey Council's Strategic Partner for the Voluntary and Community Sector (VCS) and referrals to the Sure Start Maternity Grant department of the DWP. In addition claimants can be signposted to the following: <ul style="list-style-type: none"> •The Government's "Healthy Start" scheme which provides vouchers to pregnant women and those with children under four, they can be exchanged for food, fruit and formula milk. 	N/A

			<ul style="list-style-type: none"> •Haringey has a number of Children Centres located across the borough bringing together a range of services such as childcare, family support, health and education and information on local services. •Women who are pregnant or on maternity leave are unable to work for a set period of time and are likely to be in receipt of statutory maternity pay which may help to supplement their income. 	
Marriage and Civil Partnership (note this only applies in relation to eliminating unlawful discrimination)	N/A	N/A	N/A	N/A
The impact is unknown due to insufficient data.				

Stage 5b – For your employees and considering the above information, what impact will this proposal have on the following groups: Positive and negative impacts identified will need to form part of your action plan.

N/A – employees are not impacted by the DHP Policy

Stage 6 - Initial Impact analysis	Actions to mitigate, advance equality or fill gaps in information
<p>People on the lowest incomes and particularly those affected by national Welfare Reforms are most dependent on Discretionary Housing Payments and will continue to be so. These claimants are more likely to come from groups with protected characteristics, such as ethnic minorities, single parent females, single people under 35, and people with disabilities.</p> <p>A very small increase in overall funding for 2016/17 will have an impact across all affected groups. Officers must not fetter their discretion by prescribing which groups may or may not continue to be awarded DHP, as each case must be treated on its' own merits. The policy as laid out must continue to be applied fairly; however the Council will have to decide to apply funds less generously and may need to apply conditions more restrictively.</p>	<p>Mitigation appropriate to the various groups has been listed above in Section 5a. It is noted that all groups with protected characteristics who are currently claiming DHP, are likely to be proportionately impacted by the limited increase in the amount of DHP available to spend in 2016-17.</p> <p>It is possible that decisions could be taken to favour one group with protected characteristics over another (for example, ensuring that households with children are favoured, in order not to affect the child's schooling), however each application will be treated on its own merits and individual circumstances will be taken into consideration.</p>

All groups currently receiving awards of DHP may be expected to reapply for DHP in 2016-17, unless their financial circumstances have changed. In addition, there may be more new claimants facing hardship who will seek to be awarded a DHP in 2016-17, particularly if proposed changes to the level of the Benefit Cap are implemented, and the Benefits Family Premium is removed for new cases. The spread of claimants with protected characteristics requiring DHP can be expected to be similar to the current spread of claimants. No protected characteristic group can be predicted to be more affected in 2016-17 than at present.

Decisions will need to be taken as to which might be classed as the cases in the most exceptional need. In 2016/17 our policy will put greater emphasis on measures to prevent homelessness, through collaboration with Homes for Haringey. It could be that claimants with very high shortfalls in rent, may be living in the most expensive accommodation, and so will have to be prioritised for assistance from our Homelessness Team to relocate to cheaper accommodation, though there is difficulty in sourcing such accommodation close to London. We could similarly apply these principles to such tenants who we determine to be furthest from the job market, and less likely to be able to maintain their homes without support from DHP.

We may have to decide that claimants with the lowest shortfalls cannot be assisted as much, and should seek to renegotiate rents with their landlords, or find the funds to pay these smaller shortfalls themselves. The policy has been amended for 2016/17 so that all claimants will now be expected to make a contribution to their rent shortfall unless there is a good reason why they should not do so. This is intended to improve the consistency and fairness in awards across different groups of claimants.

Improving financial resilience and addressing underlying issues to reduce reliance on crisis payments will be a key aim of our strategic approach to welfare reform in 2016/17. In 2016/17 we intend to strengthen our approach to conditionality within our DHP policy in order to ensure claimants are engaged in activities to resolve their situation and reduce reliance on DHP. The EqIA has highlighted that some groups may face particular barriers to meeting conditions and reducing reliance on DHP.

As some protected characteristics are not mandatory in order to apply for either Housing Benefit or a DHP we do not hold data on them. Although we will continue to ask for this information going forward, it is noted that it is not a mandatory requirement and as such data collection will remain challenging. It is expected that going forward the levels of DHP funding allocated to Local Government will reduce, as such we need to consider how we will administer DHPs in the future and whether the eligibility for these awards will need to change.

Expecting all claimants to make some contribution to their rent shortfall is intended to improve the consistency and fairness in awards across different groups of claimants. However, it is noted that every case will still need to be considered on its individual merits and individual circumstances may still need to be taken into consideration when deciding on the amount of DHP to award, including the vulnerability of the claimant.

Individual circumstances will continue to be taken into consideration when deciding on conditions attached to any award, including the vulnerability of the claimant.

Stage 7 - Consultation and follow up data from actions set above

There is no requirement to consult on the DHP Policy as the Government has allocated funds and there is no scope to challenge this.

Stage 8 - Final impact analysis

The reduction in funding of Discretionary Housing Payments from Government means that we had almost £1m less to spend than in 2015-16, and only a modest increase in this amount in 2016/17. The Council will have to be more selective when deciding which applications to award. Officers will do this by assessing the exceptionality of the application, the severity of the financial circumstances of the applicant, the likely timeframe that DHP will be needed by the applicant and the steps being taken by the applicant to resolve their financial problems. This is no different to current assessments.

The reduction in funds may lead to reduced values of awards, reduced length of awards, and more comprehensive assessment of whether conditions set against awards have been met, when it comes to renewing awards.

The Council will continue throughout 2016/17 to monitor successful and unsuccessful awards against protected characteristics, to ensure that no group is more affected than any other.

Stage 9 - Equality Impact Assessment Review Log

Review approved by Director / Assistant Director

Date of review

Review approved by Director / Assistant Director

Date of review

Stage 10 – Publication

Ensure the completed EqIA is published in accordance with the Council's policy.

This EQIA will be published along with the report and policy document in line with Haringey's democratic processes.

Appendix A

Welfare Reform Reasons for being Awarded a DHP

Claimant affected by the benefit cap	304	67%
Claimant affected by the Size Criteria	79	17%
Claimant affected by the LHA Reforms	38	8%
Claimant not affected by welfare reforms	36	8%

Report for: Cabinet Member Signing, 15th March 2016

Item number: 3

Title: The Haringey Support Fund



Report

Authorised by: Tracie Evans, Chief Operating Officer

Lead Officer: Amelia Hadjimichael Head of Benefits

Ward(s) affected: All

**Report for Key/
Non Key Decision:** Key

1. Describe the issue under consideration

1.1 Central Government funding for local welfare assistance ceased in April 2015 and no new funding has been allocated within the Local Government Financial Settlement for 2016/17. During 2015/16 the Council has continued to provide a local Support Fund scheme using funding held in reserves. The Council currently contracts Northgate Plc to administer its local Support Fund scheme. The existing contract was extended for 12 months in March 2015 and the contract is due to end on 31st March 2016.

1.2 At the 19th January Cabinet meeting it was agreed that when the current Support Fund contract ends, the existing scheme should be brought to an end and a proposal should be brought to the Cabinet Member for resources outlining how the Council will meet the needs of those who would have been eligible for support under the scheme. It was also agreed that remaining resources for local welfare assistance held in reserves should be aligned with other forms of assistance for those in financial hardship and a clear plan developed for targeting these resources to meet existing and future support needs.

2 Cabinet Member Introduction

2.1 The Government's decision to remove support for local financial assistance is deeply troubling when considered alongside its other welfare reforms, which are causing hardship for low-paid families across the borough. The Council remains committed to supporting the most vulnerable members of our community who may need assistance during key moments of crisis in their lives and this report sets out the interim measures to be put in place for those who would have been eligible for support through our local welfare assistance scheme.

2.2 Further reforms within the Welfare Reform and Work Bill will have a significant impact on low paid families across the borough. Not only are a wider number of residents likely to be impacted by welfare reform but the extent of financial hardship for those affected is likely to increase. In the context of these challenges it is important that the Council uses its limited resources as effectively as possible and looks to develop a more preventive approach that improves the financial resilience of our vulnerable residents and reduces reliance on crisis support.

3 Recommendations

It is recommended that the Cabinet Member for resources:

3.1 Agrees to delegate authority to the Chief Operating Officer to draw down from the remaining money held in reserves for Local Welfare Assistance in order to increase the capacity of the Homelessness Prevention Fund to address emergency needs and prevent homelessness and to support the development of a local approach to preventing crisis and supporting financial resilience.

4 Reason for decision

4.1 An element of the remaining reserves in the fund will be made available to prevent homelessness and sustain tenancies; the Benefit Team will work in collaboration with the Welfare Reform Team and Financial Inclusion Team.

4.2 Communication to signpost all kinds of support that are currently available will be promoted on our website and to our partners, a workshop will also be held with key partners in order to effectively communicate the changes to work together to signpost as many applicants as possible to other means of support that is available within the voluntary and community sector.

5 Alternative options considered

5.1 Consideration was given to a number of options. Although there is currently enough remaining in reserves to extend the contract for an additional year, this is not considered the best use of these resources as the Support Fund is expensive to administer and only supports a small proportion of those facing financial hardship. Continuing with an externally administered scheme also increases the potential for duplication and reduces opportunities to better coordinate existing resources.

5.2 Given the limited resources remaining within reserves it is not considered good value for money to use these resources to set up an in-house scheme which could only be supported for a limited period of time.

5.3 Doing nothing is not considered to be a viable option given the anticipated impact of welfare reform changes on demand for financial assistance and support in the borough, it is imperative that we use this fund to address homelessness and to sustain tenancies.

6 Background information

6.1 The Support Fund is Haringey's local welfare assistance scheme. It was introduced as a result of the Welfare Reform Act 2013 which abolished the discretionary part of the Social Fund previously administered by the DWP. In place of the Social Fund, local authorities received government funding to provide locally administered assistance to the vulnerable but had discretion in how this funding was targeted. In 2015/16 the Government removed grant funding for Local Welfare Assistance. Haringey, in common with a number of other authorities had not spent all its previous grant allocation and opted to continue the Support Fund scheme with the remaining reserves during 2015/16.

6.2 The current Support Fund contract with Northgate is due to end on March 31st 2016. Following the end of the current Support Fund contract, there will be £0.9 million in reserves remaining. At Cabinet on January 19th 2016 it was agreed that

- i. The existing Support Fund scheme should be closed at the end of the current contract
- ii. That remaining resources for local welfare assistance held in reserves should be aligned with other forms of assistance for those in financial hardship and a clear plan developed for how these resources should be targeted to meet existing and future support needs
- iii. That a report was brought to the Cabinet Member for Resources in March 2016 outlining how the Council will meet the needs of those who would have been eligible for support under the scheme when the scheme closes on 1st April

6.3 In order to determine what interim support measures are required following closure of the scheme, the Benefits service has considered the types of cases that are currently receiving funding from the scheme and the extent to which these are aligned with the existing Support Fund policy and our priority outcomes within the Corporate Plan. Key findings of this review work are:

- i. The Support Fund is currently reaching only a small number of residents, with 299 awards made between April 2015 and January 2016. This is a very small proportion of the quantum of need identified within the recent welfare reform cumulative impact assessment
- ii. There is little evidence that the scheme is meeting its overarching aim of encouraging greater financial capability and resilience and reducing dependency on the Council for emergencies. This is because the scheme offers only one off payments and does not refer on to advice or support services as a mechanism to develop financial resilience. Case studies indicate that many applicants to the scheme were previous claimants of the Social Fund and many continued to have unresolved financial difficulties, including in some cases debts to loan sharks.
- iii. There is little evidence that the scheme has duplicated other forms of support provided by the Council, with only a small number of claimants receiving multiple forms of financial assistance. However, similar forms of support are provided in other areas of the Council, such as homelessness crisis support and section 17

funding, or within the voluntary sector, such as help with immediate food costs/needs.

6.4 Two types of support are currently provided through the scheme:

- i. Crisis Support Payments
- ii. Community Care Payments

6.5 Crisis payments are intended to provide short-term support in a crisis due to a disaster or other emergency or to prevent serious damage or risk to health, safety or welfare of a person or their family. Within the existing Support Fund policy, crisis payments can be provided in the following circumstances:

- i. Where an applicant has suffered a disaster to their home
- ii. Where the health, safety or welfare of the applicant would immediately deteriorate without the ability to afford the goods or services requested

6.6 Crisis payments currently represent a very small proportion of the total spend on the scheme – only £2000 was spent on crisis awards from April 2015 to January 2016 or 1.2% of total spend. The needs that were covered by crisis award were for emergency living expenses i.e. food and utilities costs, with by far the majority of awards being made for emergency food provision.

6.7 The Support Fund is currently only meeting a small proportion of emergency needs within the borough. Other providers – particularly in the voluntary and community sector - are also picking up crisis demands, for example referral to the Haringey food bank, food vouchers provided through the CAB and emergency living expenses provided through section 17.

6.8 Within the existing Support Fund policy, community care payments aim to help people remain in the community or move back into the community after a period in institutional care or unsettled accommodation. Community care awards are made to support those leaving prison who need help with a deposit or rent in advance, vulnerable tenants moving into a new property which is unfurnished, and those already in accommodation who need help to improve their living conditions. As such they link closely with our corporate plan objectives to support residents to live independently for longer and prevent homelessness through avoiding evictions and sustaining tenancies.

6.9 In 2015/16 community care awards represented the majority of Support Fund spend. A proportion of community care awards (£11,000 in 2016/17) are made to cover tenancy deposits and rent in advance. These awards represent immediate needs which contribute towards sustaining tenancies and preventing homelessness. Immediate loss of this support could result in loss of tenancy and risk transferring demand to other services at increased cost. Currently there are other existing schemes administered by the local authority which could be used to meet these needs – Discretionary Housing Payments and the housing crisis budget.

6.10 The remaining community care awards (£156,000 in 2016/17) provide in-kind support of households goods, such as furniture and white goods, for households in settled tenancies or moving into settled tenancies. Under the current Support Fund structure, decisions on provision of these items is made separately to established policies/mechanisms for assessing and meeting the support needs of vulnerable households, such as through care and support packages.

6.11 Proposals for meeting needs from 1st April 2016

6.12 There is currently no clear evidence base for the targeting of welfare assistance funds through the Support Fund. Given the significant impact that planned national changes to welfare support will have on the incomes of some of our most vulnerable residents, it is important that the Council ensures the limited resources it holds for welfare support are effectively targeted and support our objectives around early help and prevention. The Council has therefore committed to developing a clear plan for targeting the resources for local welfare assistance currently held in reserves, particularly aimed at reducing demand for crisis and emergency support and increasing financial resilience. This process will involve engagement with relevant Council services and partners, including in the voluntary and community sector. It is intended that this consultation will take place between March and June of 2016 and further proposals will be brought to the Cabinet Member for approval.

6.13 Designing a more robust and evidence based approach will take time and in the meantime it is recognised that some form of transitional crisis support will be needed for the highest priority cases who would have been eligible for support through the Support Fund, in particular to ensure tenancies are sustained and homelessness prevented.

6.14 From 1st April it is therefore proposed that:

- i. Emergency needs for those at risk of homelessness, for example support for tenancy deposits and rent in advance, are met through the existing Homelessness Prevention Fund held within housing
- ii. That authority is delegated to the Chief Operating Officer to draw down from the remaining money held in reserves for Local Welfare Assistance in order to increase the capacity of the Homelessness Prevention Fund and to support the development of a local approach to preventing crisis and supporting financial resilience
- iii. Prior to closure of the Support Fund, the Council updates its website and communicates with those services and organisations that currently make referrals to the scheme in order to promote and signpost to the different forms of support available for those facing financial difficulty following closure of the scheme

7. Contribution to strategic objectives

7.1 The proposals within this report are part of a process to develop a more strategic response to welfare reform which was set out in the report to Cabinet of 19th January 2016. Developing a more strategic approach to welfare reform supports a number of our corporate priorities, including preventing homelessness, ensuring residents can find and

keep good quality employment, and supporting residents to live independent lives. In addition, supporting those affected by welfare reform is central to our ambition to create a fair and equal borough by tackling the underlying factors of poverty and exclusion.

8. Statutory Officer comments

8.1 Equalities Comments

- 8.1.1 Those in receipt of financial assistance are amongst some of the most vulnerable residents in the borough and include a high proportion of those from the protected groups. An EqIA was completed in relation to the decision to close the Support Fund taken to Cabinet on 19th January 2016. The EqIA has been updated to reflect the proposals within this report and is attached as Appendix A to this document.
- 8.1.2 As part of the recommended mitigating actions within the EqIA it was proposed that households no longer able to access financial assistance through the Support Fund scheme should be offered alternative sources of support where appropriate. Based on a review of existing support provided through the scheme, the Council is proposing to use some of the money held in reserves to increase capacity within its homelessness prevention budget to ensure that the most critical needs continue to be met following closure of the scheme. The Council is also proposing to use the remaining resources to support a more preventive approach that increases financial resilience and reduces reliance on crisis support.

8.2 Chief Finance Officer comments

- 8.2.1 It is not anticipated that there will be any significant budgetary impact from the proposals outlined in this report to align Haringey's local welfare assistance scheme with other forms of assistance for those in financial hardship, given the intention to draw down against existing grant allocation funds currently held in reserves.
- 8.2.2 A broader piece of work around improving financial resilience and reducing reliance on crisis support to be undertaken in 2016/17 is expected to consider how resources should be targeted to meet existing and future support needs.
- 8.2.3 In 2015/16 the Government removed grant funding for Local Welfare Assistance. Haringey opted to continue the Support Fund scheme with the remaining reserves during 2015/16. Although the government stated that councils should continue to provide local support funds concentrated on those facing greatest difficulty in managing their income, it decided not to place a new duty on local authorities in respect of the new provision. Funds were to have flexibility to allow help to those in genuine need. The Council still has some fund money available for use in this way. It proposes to develop a new approach to its use over the coming months, but in the meantime it wishes to continue to provide support, particularly in respect of Homelessness Prevention.

8.3 Comments of the Assistant Director of Corporate Governance

- 8.3.1 The report seeks to delegate authority to the Chief Operating Officer to draw down money from reserves during 2016/17, in order to increase the capacity of the Homelessness Prevention Fund to address emergency needs, sustain tenancies and prevent homelessness. This can be achieved using the power the authority has to do anything for the benefit of the authority, its area or residents present or in its area under s1 of the Localism Act 2011 (the general power of competence).

9 Use of Appendices

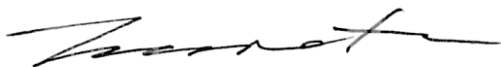
9.1 Appendix A EqlA – Support Fund

10. Local Government (Access to Information) Act 1985

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Equality Impact Assessment

Name of Project	Local Welfare Assistance	Cabinet meeting date <i>If applicable</i>	
Service area responsible	Revenues and Benefitss		
Name of completing officer	Amelia Hadjimichael	Date EqIA created	
Approved by Director / Assistant Director		Date of approval	07.03.16

The Equality Act 2010 places a '**General Duty**' on all public bodies to have '**due regard**' to:

- Eliminating discrimination, harassment and victimisation and any other conduct prohibited under the Act
- Advancing equality of opportunity between those with 'protected characteristics' and those without them
- Fostering good relations between those with 'protected characteristics' and those without them.

In addition the Council complies with the Marriage (same sex couples) Act 2013.

Haringey Council also has a '**Specific Duty**' to publish information about people affected by our policies and practices.

All assessments must be published on the Haringey equalities web pages. All Cabinet papers MUST include a link to the web page where this assessment will be published.

This Equality Impact Assessment provides evidence for meeting the Council's commitment to equality and the responsibilities outlined above, for more information about the Council's commitment to equality; please visit the Council's website.

Stage 1 – Names of those involved in preparing the EqIA	
1. Project Lead – Amelia Hadjimichael	5.
2. Equalities / HR – Kathryn Booth	6.
3. Legal Advisor (where necessary) Alison Vydulinska	7.
4. Trade union	8.

Stage 2 - Description of proposal including the relevance of the proposal to the general equality duties and protected groups. Also carry out your preliminary screening (Use the questions in the Step by Step Guide (The screening process) and document your reasoning for deciding whether or not a full EqIA is required. If a full EqIA is required move on to Stage 3.

The Welfare Reform and Work Bill will make significant changes to the provision of welfare support in addition to the previous changes brought in through the 2012 Welfare Reform Act and is likely to impact on demand for welfare assistance in the borough. In light of these changes, the Council needs to review its approach to welfare provision and the support we provide to vulnerable residents affected by welfare reform.

Our local financial assistance schemes support some of the most vulnerable members of our communities, including disabled residents, care leavers, and families in financial difficulties – a high proportion of which share the protected characteristics. Any changes to these schemes therefore has a high relevance for our equalities duty.

The report follows a report to Cabinet in January which agreed to close the Support Fund scheme at the end of the current contract from 1st April 2016 and that the remaining money held in reserves for welfare assistance should be used to support a more preventive approach to welfare reform aimed at improving financial resilience and reducing reliance on crisis support. It was agreed that further proposals would be brought to the Cabinet Member for Resources to outline what measures would be put in place for those who would have been eligible for support through the scheme following the scheme's closure. The report proposes that some of the resources held in reserves for financial assistance should be allocated to the homelessness prevention fund in 2016/17 to ensure that those at risk of homelessness can continue to be supported.

Stage 3 – Scoping Exercise - Employee data used in this Equality Impact Assessment
Identify the main sources of the evidence, both quantitative and qualitative, that supports your analysis. This could include for example, data on the Council's workforce, equalities profile of service users, recent surveys, research, results of recent relevant consultations, Haringey Borough Profile, Haringey Joint Strategic Needs Assessment and any other sources of relevant information,

local, regional or national.	
Data Source (include link where published)	What does this data include?
EqlA Profile on Harinet	Age, gender, ethnicity, disability information – for the Council and the Borough

Stage 4 – Scoping Exercise - Service data used in this Equality Impact Assessment This section to be completed where there is a change to the service provided	
Data Source (include link where published)	What does this data include?
Census 2011	Information on households in Haringey broken down by age, gender, and household type
Support Fund July monitoring report	Information on applications to the Support Fund broken down by gender, disability, household type, ethnicity, religion and age
Council Tax Reduction Scheme monitoring data	Information on Council Tax reduction Scheme broken down by age, disability, and household type
Discretionary Housing Payment monitoring data	Information on awards of DHP, including by tenure
Housing Benefit System monitoring data	Information on Housing Benefits applications, including age, ethnicity, gender and household type
Benefit cap monitoring data	Information on households affected by the benefit cap, including by tenure, age and household type

Stage 5a – Considering the above information, what impact will this proposal have on the following groups in terms of impact on residents and service delivery:

Positive and negative impacts identified will need to form part of your action plan.

	Positive	Negative	Details	None – why?
Sex	Y	Y	<p>Lone parents represent more than three quarters of those affected by the benefits cap and are therefore likely to be hit particularly hard by proposed changes to the cap. The majority of lone parents within Haringey are women (9,870 female lone parents compared to 777 male lone parents). Lone female parents are likely to need additional support to mitigate the impact of welfare reform changes.</p> <p>Lone parents represent just under a third of applicants to the Support Fund. Loss of funding for the scheme is therefore likely to impact in particular on this group.</p> <p>Recent monitoring data indicates that there is a roughly even split of Support Fund applications between men and women. The success rate for men and women under the scheme is also broadly similar.</p>	
Gender Reassignment			Our local financial assistance schemes do not currently record information related to gender reassignment. However, it is not anticipated that welfare reform changes will have a disproportionate impact on this protected group.	This protected characteristic is not disproportionately impacted by the proposed changes to the Council's financial assistance schemes
Age	Y	Y	<p>Benefit changes impact most on those of working age. 25% of those in receipt of Housing Benefit and/or Council Tax Reduction support are of pension age and are protected from the vast majority of welfare reforms.</p> <p>Younger residents are more adversely affected by welfare reform</p>	Policies do not discriminate on the basis of age?

			<p>changes. For example, 94% of those affected by the benefit cap have children and 41% are in the 25-34 age group. 18-21 year olds will also be excluded from claiming housing support under Universal Credit as a result of proposed welfare changes. Families with children are likely to be harder hit by changes in their income due to higher household costs. Younger residents and families with children are therefore more likely to need additional support to mitigate the impact of welfare reform changes.</p> <p>Most applicants to the Support Fund are aged between 26 and 59. Older residents represent a smaller proportion of applicants to the Support Fund with only 7% of applications in the last monitoring report from pensioners. However, the success rate between different age groups in terms of awards is broadly similar. Although lone parents represent a high proportion of those claiming support through the Support Fund, only a third of applicants to the scheme are households with children.</p>	
Disability	Y	Y	<p>Residents in receipt of certain disability benefits are exempt from welfare reforms such as the benefit cap. However, disabled claimants on the Employment Support Allowance WRAG group will see their income fall to the JSA rate under proposed welfare reforms. Disabled residents have also been most affected by the under-occupation charge with 51% affected by this charge claiming disability benefits. Disabled claimants may be less resilient when faced with changes in their income due to higher living cost and lower rates of employment. It is therefore likely that this protected group will need additional support to mitigate the impact of welfare reform.</p> <p>The eligibility criteria for the Council's Support Fund scheme prioritises vulnerable individuals with health and mental health issues making an award more likely. The success rate for</p>	

			claimants with disabilities is therefore higher than average. Claimants disclosing a mental health issue represent 15% of successful awards.	
Race & Ethnicity	Y	Y	<p>A significant proportion of DHP spend is on those in temporary accommodation where there is a high proportion of BME households (91% of all family heads in temporary accommodation were non White British in 2014). Certain ethnic groups are also over-represented in terms of the overall welfare claims. For example, there are 3 times as many Black Caribbean and 2 times as many Black African claimants of Job Seekers Allowance compared to the estimated working age population. These groups are therefore more likely to need additional support to mitigate the impact of welfare reform changes.</p> <p>In the most recent monitoring report, 30% of applicants to the Support Fund who disclosed their ethnicity were White British (compared to 35% in the 2011 census), and 41% were Black or Black British (compared to 18.7% in the 2011 census). However, it is difficult to draw meaningful conclusions from this data as only a third of applicants disclosed their ethnicity. The 2014 Centre for Analysis of Social Exclusion report noted that Black ethnicities were marginally less likely to have a successful award under the scheme but this was not statistically significant.</p>	
Sexual Orientation			Our local financial assistance schemes do not currently record information related to sexual orientation. However, it is not anticipated that welfare reform changes will have a disproportionate impact on this protected group.	This protected characteristic is not disproportionately impacted by the proposed changes to the Council's financial assistance schemes
Religion or Belief (or No			In the most recent monitoring report, 46% of applicants to the Support Fund who disclosed their religion were Christian, 10%	This protected characteristic is not

Belief)			Muslim, 7% other, 1.7% Buddhist, 0.8% Sikh, and 26% no religion. This is broadly in line with the 2011 census. However, it is difficult to draw meaningful conclusions from this data as only a third of applicants disclosed their religion or belief. The 2014 Centre for Analysis of Social Exclusion report noted that the success rate for different religions under the scheme was broadly similar.	disproportionately impacted by the proposed changes to the Council's financial assistance schemes
Pregnancy & Maternity			<p>Our local financial assistance schemes do not currently record information related to pregnancy or maternity. However, recent monitoring indicates that a third of applicants to the Support Fund scheme were households with children.</p> <p>Changes in income as a result of welfare reform are likely to have a significant impact on families with children due to higher outgoings. Therefore these households may need additional support to mitigate the impact of welfare reform changes.</p>	
Marriage and Civil Partnership (note this only applies in relation to eliminating unlawful discrimination (limb 1))			Our local financial assistance schemes do not currently record information on marriage or civil partnership. However, recorded information does show that single households are over-represented in applications and awards for both the Support Fund and Discretionary Housing Payments. This may be an indicator of higher levels of financial hardship amongst single income households	Welfare assistance policies do not discriminate on the basis of marriage and civil partnership

Stage 5b – For your employees and considering the above information, what impact will this proposal have on the following groups: Positive and negative impacts identified will need to form part of your action plan.

	Positive	Negative	Details	None – why?
Sex				There is no impact from these proposals for Council employees
Gender Reassignment				As above
Age				As above
Disability				As above
Race & Ethnicity				As above
Sexual Orientation				As above
Religion or Belief (or No Belief)				As above
Pregnancy & Maternity				As above
Marriage and Civil Partnership (note this only applies in relation to eliminating unlawful discrimination (limb 1))				As above

Stage 6 - Initial Impact analysis	Actions to mitigate, advance equality or fill gaps in information
<p>Certain protected groups are particularly affected by welfare reform changes. Disabled claimants for example are most affected by the under-occupation charge and changes to ESA. Lone parents have been most affected by the benefit cap and couples with children by the change to the LHA rate. These affected households are likely to need support to cope with further changes to their income arising from welfare reform.</p> <p>The Council no longer receives a specific grant for Local Welfare Assistance. It has therefore been agreed to close the current Support Fund scheme. The Support Fund currently provides one-off in-kind support to residents with community care and crisis needs, many of whom share the protected characteristics. However, the scheme has only supported a small number of those in financial hardship and support provided has been one-off rather than seeking to address underlying issues and improve financial resilience.</p> <p>In terms of eligibility criteria, our Support Fund has been specifically targeted at vulnerable groups and those facing the greatest financial hardship. In particular, single households and disabled residents are over-represented in terms of groups currently accessing support from the scheme. These groups are therefore likely to be disproportionately affected by closure of the scheme.</p>	<p>A cumulative impact analysis on the impact for different households of the national welfare reform changes has been completed. Based on the findings an action plan will be agreed setting out the Council's proposed response, including what support will be provided different groups of residents.</p> <p>We will ensure that households that can no longer receive financial assistance through the Support Fund scheme are signposted to alternative sources of support where appropriate. The Council continues to hold money in reserves which it is proposed will continue to be targeted at those facing financial hardship. It is intended that these remaining resources should be used more effectively with less of the remaining money spent on administrative costs and a greater focus on early help and prevention.</p> <p>To ensure that the most critical needs are met on closure of the scheme it has been proposed that a proportion of the money held in reserves is transferred to the homelessness prevention fund. Proposals for the remaining resources held in reserves should be targeted will be the subject of further conversations with Council services and our partners, including the Voluntary and Community Sector.</p>

Stage 7 - Consultation and follow up data from actions set above	
Data Source (include link where published)	What does this data include?
Consultation has not been undertaken specifically on the closure	

of the Support Fund. This is due to the one-off and discretionary nature of the scheme. However, the Council plans to consult on the development of proposals for using the remaining resources held in reserves for local welfare assistance.	
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Stage 8 - Final impact analysis

Those in receipt of financial assistance are amongst some of the most vulnerable residents in the borough and include a high proportion of those from the protected groups. For 2016/17 it is proposed that the Council develops a clear plan for how resources should be targeted to meet the needs of vulnerable groups of residents who face financial difficulties. Our approach in 2016/17 will be focussed more on improving financial resilience and reducing reliance on crisis support.

The Support Fund has supported only a small number of residents and closure of the scheme should therefore have a low impact. However, it is recognised that protected groups may be more disproportionately affected. As part of the recommended mitigating actions within the EqlA it is proposed that households no longer able to access financial assistance through the Support Fund are offered alternative sources of support where appropriate, including through referral for homelessness prevention support.

Stage 9 - Equality Impact Assessment Review Log

Review approved by Director / Assistant Director

Date of review

Review approved by Director / Assistant Director

Date of review

Stage 10 – Publication

Ensure the completed EqIA is published in accordance with the Council's policy.

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