

## Equality Impact Assessment (EQIA)

The Equality Impact Assessment (EQIA) form is a template for analysing a policy or proposed decision for its potential effects on residents with protected characteristics covered by the Equality Act 2010.

The council has a Public Sector Equality Duty under the Equality Act (2010) to have due regard to the need to:

- Eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act
- Advance equality of opportunity between people who share protected characteristics and people who do not
- Foster good relations between people who share those characteristics and people who do not

The three parts of the duty apply to the following protected characteristics: age, disability, gender reassignment, pregnancy/maternity, race, religion/faith, sex and sexual orientation. Marriage and civil partnership status applies to the first part of the duty.

Although it is not enforced in legislation as a protected characteristic, Haringey Council recognises the profound and far-reaching impacts of socioeconomic disadvantage treats socioeconomic status as a local protected characteristic.

### 1. Responsibility for the Equality Impact Assessment

<b>Name of proposal:</b>	<b>Review of Discretionary Housing Payment Policy 2023</b>
<b>Service Area:</b>	<b>Corporate &amp; Customer Services / Revenues and Benefits</b>
<b>Officer Completing Assessment:</b>	<b>Jim Brady</b>
<b>Equalities/HR Advisor:</b>	<b>Jim Pomeroy</b>
<b>Cabinet meeting date (if applicable):</b>	<b>February 2023</b>
<b>Director/Assistant Director</b>	<b>Andy Briggs</b>

### 2. Executive summary

Please complete this section *after* completing the rest of the form and summarise:

- The policy proposal, its aims and objectives, the decision in consideration. Please focus on **the change** that will result from this decision.
- Results of the analysis: positive and negative equality impacts

- Mitigations that will be taken to minimise negative equality impacts (if relevant)
- Next steps (this may be future consultation or stages of the project)

The Culture Strategy and Engagement has produced a report relating to Discretionary Housing Payment (DHP) Awards, asking Members to approve Haringey's Discretionary Housing Payments Policy review 2023. This is the policy to determine awards of individual Discretionary Housing Payments.

The substance of the policy is unchanged.

The Discretionary Housing Payment policy is administered by the Council to provide financial assistance to help tenants at risk of homelessness with their housing costs. This enables the Council to play an important role in sustaining tenancies, preventing homelessness and, where applicable, by helping tenants to move to more affordable accommodation. The policy is an integral part of the Council's administration of the Welfare Reform Act 2012 and ensures that the most vulnerable get effective protection and that 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 £296.35 per week for single people and £442.31 per week for others, and the Social Sector Size Criteria (also known as the Bedroom Tax – a restriction on Housing Benefit for tenants of Social Landlords, who have more bedrooms than they are deemed to need).

Analysis of the spend on Discretionary Housing Payment for the year to 2022/2023 to date has shown that the effect of the policy on groups with protected characteristics is either positive or neutral. No Negative impacts have been identified.

### **3. Consultation and engagement**

3a. How will consultation and/or engagement inform your assessment of the impact of the proposal on protected groups of residents, service users and/or staff?

This is an extension of an existing policy. No changes have been made to the policy, so no further consultation is proposed.

3b. Outline the key findings of your consultation / engagement activities once completed, particularly in terms of how this relates to groups that share the protected characteristics

No consultation has been proposed for this policy extension.

### **4. Data and Impact Analysis**

**Please consider how the proposed change will affect people with protected characteristics.**

#### **4a. Age**

##### **Data**

##### **Borough Profile<sup>1</sup>**

56,718: 0-17 (21%)

72,807: 18-34 (27%)

68,257: 35-49 (25%)

44,807: 50-64 (17%)

28,632: 65+ (11%)

##### **Target Population Profile**

0-17 (0%)

18-34 (18%)

35-49 (34%)

50-64 (38%)

65+ (11%)

What data sources will you use to inform your assessment of the impact of the proposal on people under this protected characteristic?

Analysis of the 2022/23 allocation of Discretionary Housing Payments has been undertaken and where data is available, this has been used to populate the figures above.

Detail the findings of the data.

- a) Might members of this group be disproportionately affected by the proposal due to overrepresentation? How does this compare with the wider demographic profile of the Borough?
- b) Might members of this group be disproportionately affected by this proposal as a result of a need related to their protected characteristic?

Where the data is available, our figures show that 11% of successful applicants were over 65, 72% were between 35-65, 18% were between 18-34. People awarded Discretionary Housing Payment and over 65 are not proportionate to the general population as they tend to be less affected by welfare reforms than working-age people. For that reason, working-age people awarded Discretionary Housing Payment are proportionately more than the general population. Common reasons for this are listed below.

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

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<sup>1</sup> Source: State of the Borough

accommodation. As such they are more likely to claim additional funds from Discretionary Housing Payment.

- People between 35-65 are more likely to have children, and be in temporary accommodation, and therefore affected more by the Benefit Cap.
- Those with adult children leaving home, may be more affected by the Bedroom Tax.
- Older people (though not pensioners who are exempt) 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.
- Limited funds in the Discretionary Housing Payment budget means that these groups are more likely to be affected by restricted amounts of Discretionary Housing Payment funding being awarded. 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.
- 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 focused training provided by Haringey Adult Learning Services, CONEL and other Haringey based providers.
- Where people have been affected by multiple welfare reform changes (such as the Benefit Cap and the Size Criteria changes) they will continue to receive individual assistance including one-to-one interviews with colleagues from Housing Services and Jobcentre Plus and direct referrals to support providers such as Citizens Advice Haringey or through The Bridge Renewal Trust, Haringey Council's Strategic Partner for the Voluntary and Community Sector (VCS).

### **Impacts**

- Consider whether the proposed policy/decision will have positive, neutral, or negative impacts (including but not limited to health impacts).

Those aged 35 and below, as well as older people (up to the age of 65) are more likely to be claimants affected by welfare reforms and are therefore more likely to benefit from continued Discretionary Housing Payment funding.

Impact Result is Positive

## **4b. Disability<sup>2</sup>**

### **Data**

#### **Borough Profile <sup>3</sup>**

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<sup>2</sup> In the Equality Act a disability means a physical or a mental condition which has a substantial and long-term impact on your ability to do normal day to day activities.

<sup>3</sup> Source: 2011 Census

4,500 people have a serious physical disability in Haringey.

19,500 aged 16-64 have a physical disability this equates to approximately 10% of the population aged 16-64.

1,090 people living with a learning disability in Haringey.

4,400 people have been diagnosed with severe mental illness in Haringey.

### **Target Population Profile**

Of the data available for existing Discretionary Housing Payment recipients in 2022/2023, 18% receive a state benefit which indicates a disability. Due to recording limitations, this percentage is likely to be higher.

What data sources will you use to inform your assessment of the impact of the proposal on people under this protected characteristic?

Analysis of the 2022/23 allocation of Discretionary Housing Payments has been undertaken and where data is available, this has been used to populate the figure above.

Detail the findings of the data.

- a) Might members of this group be disproportionately affected by the proposal due to overrepresentation? How does this compare with the wider demographic profile of the Borough?
- b) Might members of this group be disproportionately affected by this proposal by dint of a need related to their protected characteristic?

Disabled people are more likely to live on low incomes and be more likely to request assistance from the Discretionary Housing Payment budget, so successful claims from disabled people are likely to be proportionately higher than the general population. At least 18% of applicants in 2022/23 are known to receive a benefit which indicates a disability.

Where restrictions are in place and yet there is a care need for an additional bedroom, applications are carefully considered. 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.

No individuals whose access to the internet is restricted by their disability will be prevented from making a Discretionary Housing Payment claim as there will be a paper-based alternative available.

### **Impacts**

- Consider whether the proposed policy/decision will have positive, neutral, or negative impacts (including but not limited to health impacts).

Those who have a disability are more likely to be claimants and are therefore more likely to benefit from continued Discretionary Housing Payment funding.

Impact Result is Positive

## 4c. Gender Reassignment<sup>4</sup>

### Data

#### Borough Profile

There is no robust data at Borough level on our Trans population, however the central government estimates that there are approximately 200,000-500,000 Trans people in the UK. Assuming an average representation, this would mean between 800 and 2000 Haringey residents are Trans.<sup>5</sup>

#### Target Population Profile

Discretionary Housing Payment 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 Discretionary Housing Payments, nor will it be in the future. We have no reason to believe that Trans individuals will be disproportionately impacted by the Discretionary Housing Payment Policy.

What data sources will you use to inform your assessment of the impact of the proposal on people under this protected characteristic?

We have no local data from existing Discretionary Housing Payment awards on this characteristic

Detail the findings of the data.

- a) Might members of this group be disproportionately affected by the proposal due to overrepresentation? How does this compare with the wider demographic profile of the Borough?
- b) Might members of this group be disproportionately affected by this proposal by dint of a need related to their protected characteristic?

Data on gender reassignment is not collected among claimants. There is no data to suggest that there will be a disproportionate impact on this protected characteristic group, however the service will ensure that the same eligibility criteria is applied in all cases, to minimise any disproportionately negative impact on this group.

#### Impacts

- Consider whether the proposed policy/decision will have positive, neutral, or negative impacts (including but not limited to health impacts).

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<sup>4</sup> Under the legal definition, a transgender person has the protected characteristic of gender reassignment if they are undergoing, have undergone, or are proposing to undergo gender reassignment. To be protected from gender reassignment discrimination, an individual does not need to have undergone any specific treatment or surgery to change from one's birth sex to one's preferred gender. This is because changing one's physiological or other gender attributes is a personal process rather than a medical one.

<sup>5</sup> Trans is an umbrella term to describe people whose gender is not the same as, or does not sit comfortably with, the sex they were assigned at birth.

Impact Result is Neutral

## 4d. Marriage and Civil Partnership

### Data

#### Borough Profile <sup>6</sup>

Divorced or formerly in a same-sex civil partnership which is now legally dissolved: (8.2%)

In a registered same-sex civil partnership: (0.6%)

Married: (33.3%)

Separated (but still legally married or still legally in a same-sex civil partnership): (4.0%)

Single (never married or never registered a same-sex civil partnership): (50.0%)

Widowed or surviving partner from a same-sex civil partnership: (3.9%)

### Target Population Profile

Data on marriage and civil partnership is not collected among claimants. There is no data to suggest that there will be a disproportionate impact on people in marriages or people in civil partnerships.

What data sources will you use to inform your assessment of the impact of the proposal on people under this protected characteristic?

We have no data from existing Discretionary Housing Payment awards on this characteristic

Detail the findings of the data.

- a) Might members of this group be disproportionately affected by the proposal due to overrepresentation? How does this compare with the wider demographic profile of the Borough?
- b) Might members of this group be disproportionately affected by this proposal by dint of a need related to their protected characteristic?

Housing Benefit and Discretionary Housing Payment applicants do not have to provide any details relating to marriage and civil partnership.

Single males and single females are also impacted groups as they are more likely to move between residences more frequently and live in relatively 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. From available data, we have identified that 17% of applicants are male and single. 75% of applicants are female and single.

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<sup>6</sup> Source: 2011 Census

## Impacts

- Consider whether the proposed policy/decision will have positive, neutral, or negative impacts (including but not limited to health impacts).

The impact is Neutral for people who are married or in civil partnerships

The impact is Positive for Single People.

## 4e. Pregnancy and Maternity

### Data

#### Borough Profile <sup>7</sup>

Live Births in Haringey 2019: 3646

### Target Population Profile

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.

- What data sources will you use to inform your assessment of the impact of the proposal on people under this protected characteristic?

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 claim Discretionary Housing Payment.

Where appropriate there will continue to be targeted signposting in place for those needing support with children through Children's 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: 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.

Haringey has a number of Children's 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.

Detail the findings of the data.

- a) Might members of this group be disproportionately affected by the proposal due to overrepresentation? How does this compare with the wider demographic profile of the Borough?

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<sup>7</sup> Births by Borough (ONS)



- b) Might members of this group be disproportionately affected by this proposal by dint of a need related to their protected characteristic?

Pregnant women are more likely to live on low incomes and claim Discretionary Housing Payment, meaning that this group may be disproportionate to the general population but is more likely to benefit from continued Discretionary Housing Payment funding.

### Impacts

- Consider whether the proposed policy/decision will have positive, neutral, or negative impacts (including but not limited to health impacts).

Impact Result is Positive

## 4f. Race

### Data

#### **Borough Profile <sup>8</sup>**

Arab: **0.9%**

Any other ethnic group: 3.9%

Asian: **9.5%**

Bangladeshi: 1.7%

Chinese: 1.5%

Indian: 2.3%

Pakistani: 0.8%

Other Asian: 3.2%

Black: **18.7%**

African: 9.0%

Caribbean: 7.1%

Other Black: 2.6%

Mixed: **6.5%**

White and Asian: 1.5%

White and Black African: 1.0%

White and Black Caribbean: 1.9%

Other Mixed: 2.1%

White: **60.5% in total**

English/Welsh/Scottish/Norther Irish/British: 34.7%

Irish: 2.7%

Gypsy or Irish Traveller: 0.1%

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<sup>8</sup> Source: 2011 Census

Other White: 23%

### **Target Population Profile**

Arab: 2%

Asian: 2%

Black: 34%

Mixed: 16%

English/Welsh/Scottish/Norther Irish/British: 22%

Other White: 24%

What data sources will you use to inform your assessment of the impact of the proposal on people under this protected characteristic?

Analysis of the 2021/22/23 allocation of Discretionary Housing Payments has been undertaken and where data is available, this has been used to populate the figure above. Due to recording limitations on Universal Credit claims, we have limited data on ethnicity.

Detail the findings of the data.

- a) Might members of this group be disproportionately affected by the proposal due to overrepresentation? How does this compare with the wider demographic profile of the Borough?
- b) Might members of this group be disproportionately affected by this proposal by dint of a need related to their protected characteristic?

Of those who have declared their ethnicity, evidence held suggests that people from minority ethnic groups are more likely to live on low incomes and more likely to request assistance from the Discretionary Housing Payment budget. In 2022/23, where the data was available, 34% of applicants (whose ethnicity is recorded) were Black, 22% were White British, 24% were White Other, 16% have mixed ethnicity, 2% were Asian and 2% were from Arab backgrounds.

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 minority ethnic groups and high levels of deprivation.

Relationships have been built with local Jobcentre Plus sites where claimants 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.

### **Impacts**

- Consider whether the proposed policy/decision will have positive, neutral, or negative impacts (including but not limited to health impacts).

Those from a minority ethnic background are more likely to be claimants and are therefore more likely to benefit from continued Discretionary Housing Payment funding.

Impact Result is Positive

#### **4g. Religion or belief**

##### **Data**

##### **Borough Profile <sup>9</sup>**

Christian: 45%

Buddhist: 1.1%

Hindu: 1.9%

Jewish: 3%

Muslim: 14.2%

No religion: 25.2%

Other religion: 0.5%

Religion not stated: 8.9%

Sikh: 0.3%

##### **Target Population Profile**

The service does not hold data in relation to religious belief.

What data will you use to inform your assessment of the impact of the proposal on people under this protected characteristic?

Discretionary Housing Payment applicants do not have to provide any details relating to religion. There is no evidence to suggest that religion has been a relevant factor in awarding Discretionary Housing Payment, nor will it be in the future. We have no reason to believe that individuals of any specific faith (or none) will be disproportionately impacted by the Discretionary Housing Payment Policy.

##### **Impacts**

- Consider whether the proposed policy/decision will have positive, neutral, or negative impacts (including but not limited to health impacts).

Impact Result is Neutral

#### **4h. Sex**

##### **Data**

##### **Borough profile <sup>10</sup>**

Females: (50.5%)

Males: (49.5%)

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<sup>9</sup> Source: 2011 Census

<sup>10</sup> Source: 2011 Census

## Target Population Profile

Of existing Discretionary Housing Payment recipients, 78% are female and 22% are male.

What data sources will you use to inform your assessment of the impact of the proposal on people under this protected characteristic?

Analysis of the 2022/23 allocation of Discretionary Housing Payments has been undertaken and where data is available, this has been used to populate the figures above.

Detail the findings of the data.

- a) Might members of this group be disproportionately affected by the proposal due to overrepresentation? How does this compare with the wider demographic profile of the Borough?
- b) Might members of this group be disproportionately affected by this proposal by dint of a need related to their protected characteristic?

All People will continue to be subject to the same eligibility criteria and people of either sex will see the same overall impact of the reduced funding levels.

The majority of claimants who will be affected are female, in particular lone female parents who are a predominant group of Housing Benefit claimants. Where the data was available, 78% of applicants in 2022/23 were female.

Limited funds in the Discretionary Housing Payment budget means that these groups may be more likely to be affected by restricted amounts of Discretionary Housing Payment funding being awarded. 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

Female claimants who are affected by the benefit cap will have access to job centre advisors 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 Northeast London (CONEL)

Where appropriate there will continue to be targeted signposting in place for local groups offering support that is sex specific, via The Bridge Renewal Trust, Haringey Council's Strategic Partner for the Voluntary and Community Sector (VCS)

All groups impacted by the Benefit CAP will continue to have targeted support offered to them in terms of housing, childcare and training opportunities.

## Impacts

- Consider whether the proposed policy/decision will have positive, neutral, or negative impacts (including but not limited to health impacts).

Impact Result is Positive

## 4i. Sexual Orientation

Data

### **Borough profile** <sup>11</sup>

3.2% of London residents aged 16 or over identified themselves as lesbian, gay or bisexual in 2013. In Haringey this equates to 6,491 residents.

### **Target Population Profile**

Discretionary Housing Payment applicants do not have to provide any details relating to sexual orientation.

What data sources will you use to inform your assessment of the impact of the proposal on people under this protected characteristic?

Discretionary Housing Payment applicants do not have to provide any details relating to sexual orientation. There is no evidence to suggest that sexual orientation has been a relevant factor in awarding Discretionary Housing Payment, nor will it be in the future. We have no reason to believe that individuals of any specific sexual orientation will be disproportionately impacted by the Discretionary Housing Payment Policy.

Detail the findings of the data.

- a) Might members of this group be disproportionately affected by the proposal due to overrepresentation? How does this compare with the wider demographic profile of the Borough?
- b) Might members of this group be disproportionately affected by this proposal by dint of a need related to their protected characteristic?

We have no reason to believe there is any discrimination or disproportionality in the awards of Discretionary Housing Payment in terms of sexual orientation.

LGBT+ people are more likely to be vulnerable to becoming homeless and to move between residences more frequently and live in relatively expensive private sector accommodation which cannot always be funded purely on Housing Benefit and as such, a rent top-up is requested from the Discretionary Housing Payment budget. It has been reported that the LGBT Foundation has seen a large increase in enquiries relating to Housing.

### **Impacts**

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<sup>11</sup> Source: ONS Integrated Household Survey

- Consider whether the proposed policy/decision will have positive, neutral, or negative impacts (including but not limited to health impacts).

Impact Result is likely to be Positive or Neutral

#### 4j. Socioeconomic Status (local)

##### Data

##### Borough profile

##### Income<sup>12</sup>

Haringey is the 4th most deprived in London as measured by the IMD score 2019 (where 1 = most deprived). The most deprived LSOAs (Lower Super Output Areas or small neighbourhood areas) are more heavily concentrated in the east of the borough.

22.4% of the population in Haringey aged 16-65 receive Universal Credit as of March 2021.

29% of employee jobs in the borough are paid less than the London Living Wage. The average wage of someone working in Haringey is £30,452 per year and the average resident wage (including people who travel out of the borough for work) is £35,769 per year.

##### Educational Attainment<sup>13</sup>

While Haringey's proportion of students attaining grade 5 or above in English and Mathematics GCSEs is higher than the national average, it performs worse than London.

5.5% of Haringey residents have no qualifications.

##### Target Population Profile

19,252 Housing Benefit Recipients in January 2023

36,617 Universal Credit Recipients in October 2022

What data sources will you use to inform your assessment of the impact of the proposal on people under this protected characteristic?

Analysis of the 2022/23 allocation of Discretionary Housing Payments has been undertaken and where data is available, this has been used to populate the figures above.

Detail the findings of the data.

- a) Might members of this group be disproportionately affected by the proposal due to overrepresentation? How does this compare with the wider demographic profile of the Borough?

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<sup>12</sup> Source: Annual Survey of Hours and Earnings, ONS, 2019

<sup>13</sup> Source: Annual Population Survey 2019 (via nomis)

- b) Might members of this group be disproportionately affected by this proposal by dint of a need related to their protected characteristic?

Recipients of Discretionary Housing Payment must also receive either Housing Benefit or the Housing Element of Universal Credit. This means that recipients of Discretionary Housing Payment are dependent on state assistance for their Housing Costs due to low incomes. As such they are among the most socially disadvantaged people in the borough. Discretionary Housing Payment enables people who face restrictions in the amount of rent paid through Housing Benefit or Universal Credit, to receive a top-up of funds which enables them to pay their rent and remain in their homes and not face homelessness. People who are able to afford their rent, cannot lawfully receive Discretionary Housing Payment, so socially disadvantaged people make up the entirety of Discretionary Housing Payment recipients. Though this makes socially disadvantaged people disproportionately benefit from this policy, that is the sole reason that funding has been made available.

One additional socio-economic area of Discretionary Housing Payment awards is also discussed below.

### **Tenancy Type**

Analysis from 2022/23 suggests that Temporary Accommodation cases account for a disproportionate number of Discretionary Housing Payment. Residents in this type of accommodation are often particularly vulnerable. In addition, this is because rents are expensive in Temporary Accommodation, and Benefit Cap is most likely to affect tenants in Temporary Accommodation.

### **Impacts**

- Consider whether the proposed policy/decision will have positive, neutral, or negative impacts (including but not limited to health impacts).

Impact Result is Positive

## **5. Key Impacts Summary**

### **5a. Outline the key findings of your data analysis.**

The analysis undertaken shows that the existing policy has been effective in assisting many people from disadvantaged groups to be able to pay their rent and remain in their homes.

### **5b. Intersectionality**

- Many proposals will predominantly impact individuals who have more than one protected characteristic, thereby transforming the impact of the decision.
- This section is about applying a systemic analysis to the impact of the decision and ensuring protected characteristics are not considered in isolation from the individuals who embody them.

- Please consider if there is an impact on one or more of the protected groups? Who are the groups and what is the impact?

Groups who share more than one protected characteristic and are more likely to claim Discretionary Housing Payment and therefore benefit from continued Discretionary Housing Payment funding. People from ethnic minorities, women and disabled and vulnerable people are more likely to live on low incomes and face more difficulties in achieving better incomes. Some groups which may be affected, and cross multiple groups include:

- Ethnic Minority women
- Women with disabilities
- Pregnant ethnic minority women
- Young women
- Older people with disabilities

### **5c. Data Gaps**

Based on your data are there any relevant groups who have not yet been consulted or engaged? Please explain how you will address this

Based on existing patterns of Discretionary Housing Payment awards, no further groups have been excluded from consideration for the continuation of this policy.

## **6. Overall impact of the policy for the Public Sector Equality Duty**

Summarise the key implications of the decision for people with protected characteristics.

In your answer, please consider the following three questions:

- Could the proposal result in any direct/indirect discrimination for any group that shares the relevant protected characteristics?
- Will the proposal help to advance equality of opportunity between groups who share a relevant protected characteristic and those who do not?
- Will the proposal help to foster good relations between groups who share a relevant protected characteristic and those who do not?

The policy is used to make decisions on award of Discretionary Housing Payment. Officers will do this by assessing the exceptionality of the application, the severity of the financial circumstances of the applicant, the likely timeframe that Discretionary Housing Payment will be needed by the applicant and the steps being taken by the applicant to improve their financial situation. We will also make use of available resources to signpost applicants to sources of further assistance, which may for example help them with budgeting, or to find employment, or better paid employment,



or assist them with finding cheaper accommodation, and therefore be less reliant on the need to receive financial assistance from Discretionary Housing Payments

The Discretionary Housing Payment application process is online for Haringey residents, with offline application forms available on request from Haringey's Customer Service Centres. This does not pose any equalities challenges, as the offline option is well signposted and remains easily accessible to those who do not have access to, or do not know how to use, the internet. If this were not the case, there would be a risk that this could exclude some residents from applying for funds, particularly older residents and those with a disability who experience higher rates of digital exclusion.

The limited 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. This would not be expected to impact or discriminate disproportionately towards any particular group of people with protected characteristics.

People from groups with protected characteristics are most likely to benefit from the Discretionary Housing Payments, as they are most likely to be affected by welfare reforms and be on the lowest incomes. This policy reduces the risk of people from groups with protected characteristics being evicted and advances their prospects of retaining their homes and local connections.

By working with people who receive Discretionary Housing Payments to improve their circumstances, the Council aims to meet its objectives to reduce poverty and deprivation.

## 7. Amendments and mitigations

### 7a. What changes, if any, do you plan to make to your proposal because of the Equality Impact Assessment?

Further information on responding to identified impacts is contained within accompanying EQIA guidance

Please delete Y/N as applicable

**No major change to the proposal:** the EQIA demonstrates the proposal is robust and there is no potential for discrimination or adverse impact. All opportunities to promote equality have been taken. If you have found any inequalities or negative impacts that you are unable to mitigate, please provide a compelling reason below why you are unable to mitigate them

No – No major change to policy is being proposed. The EQIA demonstrates the proposal is robust and there is no potential for discrimination or adverse impact. All opportunities to promote equality have been taken.

**Adjust the proposal:** the EQIA identifies potential problems or missed opportunities. Adjust the proposal to remove barriers or better promote equality. Clearly set out below the key adjustments you plan to make to the policy. If there are any adverse impacts you cannot mitigate, please provide a compelling reason below **Y/N**

No – No major change to policy is being proposed. The EQIA identifies no potential problems or missed opportunities.

**Stop and remove the proposal:** the proposal shows actual or potential avoidable adverse impacts on different protected characteristics. The decision maker must not make this decision. **Y/N**

No – No major change to policy is being proposed. The EQIA identifies no actual or potential avoidable adverse impacts on different protected characteristics.

**7b. What specific actions do you plan to take to remove or mitigate any actual or potential negative impact and to further the aims of the Equality Duty?**

Action:

No negative impacts have been identified as a result of this policy.

Lead officer: Not applicable as no changes are proposed

Timescale: Not applicable as no changes are proposed

Please outline any areas you have identified where negative impacts will happen because of the proposal, but it is not possible to mitigate them.

Please provide a complete and honest justification on why it is not possible to mitigate the:

Not applicable as no negative impacts have been identified

## 7. Ongoing monitoring

Summarise the measures you intend to put in place to monitor the equalities impact of the proposal as it is implemented.

- Who will be responsible for the monitoring?
- What the type of data needed is and how often it will be analysed.
- When the policy will be reviewed and what evidence could trigger an early revision
- How to continue to involve relevant groups and communities in the implementation and monitoring of the policy?

Monitoring of the awards made for Discretionary Housing Payment will continue. The same data as is currently collected will continue to be collected. No new data collection is being proposed.

The policy will be made available on the Haringey Website and we welcome any comments regarding it, and will review any comments made by interested parties for future policy enhancement.

**Date of EQIA monitoring review: Quarter 4 2023/2024.**

## **8. Authorisation**

EQIA approved by (Assistant Director/ Director)

**Andy Briggs**

Date

**17<sup>th</sup> January 2023**

## **9. Publication**

Please ensure the completed EQIA is published in accordance with the Council's policy.

Please contact the Policy & Strategy Team for any feedback on the EQIA process.