

Appendix D – Equalities Impact Assessment

Service:	Revenues, Benefits and Customer Services
Directorate:	Assistant Chief Executive
Title of proposal:	Implementation of the Support Fund
Lead Officer (author of the proposal):	Paul Ellicott
Names of other Officers involved:	Carla Segel, Helena Pugh, Eve Pelekanos

Statement of purpose

In making this proposal, we have been mindful of our public sector equality duty to have due regard to the need to:

- a) eliminate discrimination;
- b) advance equality of opportunity between different groups and;
- c) foster good relations between groups in Haringey.

In addition we are committed to ensuring that we promote social inclusion in all council services making sure that they address the needs of those vulnerable residents who rely most heavily on them. The most socially excluded residents predominantly have the protected characteristics defined in the Equality Act 2010.

The purpose of this assessment is to:

- a) Identify whether and to what extent this proposal: could produce disadvantage or enhance opportunity for any groups with the protected characteristic defined in the Equality Act 2010;
- b) Establish whether the potential disadvantage is significant enough to call for special measures to remove or reduce the disadvantage;
- c) Identify and set out the measures that will be taken to remove or reduce the disadvantage;
- d) Where mitigation measures are not possible, to set out and explain why;
- e) To ensure that Members are fully aware of the implications the proposal may have for the Council's public sector equality duty before they decide on the proposal.

Step One: Identify the aims of the proposal

1) Please state:

- **What problems the proposal is intended to address**
- **What effects it is intended to achieve**
- **Which group(s) it is intended to benefit and how**

From 01 April 2013 the Government is abolishing the current Community Care Grant and Crisis Loan Schemes. In order to avoid a gap in support for vulnerable people the Government advises that new arrangements will need to be in place from this date.

Responsibility for payments under the “discretionary” category of the Social Fund will become the responsibility of Local Authorities. This covers items such as household equipment, clothing and travel expenses intended to help vulnerable people remain in or return to the community and where immediate short-term need arises following a crisis.

All people currently entitled to apply for an award under the current Schemes will be affected by these changes. In order to remain consistent, where possible Haringey’s local scheme will mirror that of the DWP’s. Where applicants are not given an award due to not meeting the set eligibility criteria they will be sign posted elsewhere and given other options for support.

In order to avoid confusion with the elements of the Social Fund remaining with Central Government, it is suggested that Haringey’s fund be renamed “Support Fund”.

Duty under the Child Poverty Act 2010

In relation to the proposed Support Fund Scheme, the child poverty duty involves the requirement to consider the impact the scheme will have on Haringey’s children living in poverty as described in Haringey’s *child poverty needs assessment* and work with partner agencies named in the Act to address the effects of child poverty in Haringey.

Public sector equality duty – disability

The Council will need to make sure additional challenges that disabled people face which may affect their income (and therefore their need for assistance under this Scheme) are considered. This could, for example involve, recognising the limited ability of disabled people to find and sustain employment or the likely additional disability-related cost of living.

Duty to prevent homelessness

Part 7 of the Housing Act 1996 provides a safety net for households with dependent children and vulnerable people who become homeless through no fault of their own.

In relation to the Support Fund scheme, the homelessness duty may lie in the way eligibility is considered and the way the award is made.

Step Two: Consideration of available data, research and information

Instruction: You should gather all relevant quantitative and qualitative data that will help you assess whether at present, there are differential outcomes for the different equalities target groups – diverse ethnic groups, women, men, older people, young people, disabled people, gay men, lesbians and transgender people and faith groups, etc. Identify where there are gaps in data and say how you plug these gaps.

In order to establish whether a group is experiencing disproportionate effects, you should relate the data for each group to its population size. The Haringey Borough Profile of Protected Characteristics (can be found on the Website) will help you to make comparisons against Haringey's population size. The most up to date information can be found in the [Joint Strategic Needs Assessment](#).

1) Using data from equalities monitoring, recent surveys, research, consultation etc. are there group(s) in the community who:

- are significantly under/over represented in the use of the service, when compared to their population size?
- have raised concerns about access to services or quality of services?

The current scheme is administered by the DWP and they have been unable to provide detailed analysis of current claimants and projections of impact on future claimants. The information shown below is taken from 11/12 and breaks down the awards according to the categories held by the DWP for Haringey.

2011/12 (Full Year) Awards & Applications rounded to nearest 10	Crisis Loan Items	Crisis Loan Living Expenses	Crisis Loan Alignments	Community Care Grants	Budgeting Loans
Summary					
Number of applications received	1,020	4,550	3,770	2,910	7,210
Total expenditure	£ 264,800	£ 188,700	£ 213,900	£ 866,300	£ 211,500
Number of Awards	610	3,520	3,410	1,200	4,920
Lone Parent Status					
Lone parent	8%	13%	8%	23%	38%
Not a lone parent	75%	70%	75%	43%	33%
Unknown	17%	17%	17%	34%	29%
Age of Youngest Child					
0 to 5	4%	10%	6%	16%	28%
6 to 8	1%	2%	2%	5%	6%
9 to 12	1%	2%	1%	5%	4%
13 to 16	0%	1%	1%	4%	3%
No children 16 or under	92%	85%	90%	70%	58%
Age of recipient					
Under 18	0%	0%	1%	1%	0%
18 to 24	22%	26%	31%	10%	12%
25 to 34	29%	28%	29%	20%	24%
35 to 44	24%	23%	21%	25%	25%
15 to 54	20%	18%	15%	22%	21%

55 to 64	3%	4%	4%	1100%	10%
65 to 69	0%	0%	0%	3%	3%
70 to 79	1%	0%	0%	6%	4%
80 to 89	0%	0%	0%	2%	0%
Household Type					
Couple	1%	3%	2%	11%	8%
Single Female	23%	34%	29%	52%	60%
Single Male	76%	63%	69%	37%	33%

The equalities information shown below is taken from 11/12 and breaks down the awards according to the categories held by the DWP for the scheme as a whole, they have been unable to provide this data for Haringey residents only.

2011/12 (Full Year) Awards & Applications rounded to nearest 10	Crisis Loan Applications	Community Care Grant Applications
Disability Status		
Not Disabled	66%	57%
Disabled	31%	33%
Unknown	2%	10%

2011/12 (Full Year) Awards & Applications rounded to nearest 10	Crisis Loan Applications	Community Care Grant Applications
Race		
White	79%	65%
Mixed	2%	2%
Asian or Asian British	2%	1%
Black or Black British	5%	5%
Other ethnic group	1%	1%
Unknown / Prefer not to say	11%	26%

We engaged with residents currently in Temporary Accommodation to understand if they were aware of the scheme and had made use of it, the results of this are shown below.

	Have you made an application under the current Social Fund Scheme	
Yes	4	1%
No	125	20%
Did not answer	490	79%
Total	619	100%

It is expected that detailed data will be gathered in the first 12 months of the scheme implementation which will be used to further understand which groups are applying for the awards and for what purposes. At this stage we may consider amending the scheme eligibility criteria or publicity of it depending on what the data analysis shows.

2) What factors / barriers might account for this under/over representation?

Even without detailed data, there are likely to be certain groups who are over-represented among claimants who are likely to make applications under the scheme. The reasons for this over representation are multiple and complex and are extensively described in the Council's various key strategic documents and summarised in the Corporate Equality Objectives 2012 – 16. The key factors are:

- **Unemployment** – especially in the east of the borough and within some groups including women, especially lone female parents and minority ethnic communities.
- **Deprivation** – with a disproportionately high concentration in the east and within minority ethnic communities.
- **Child poverty** –with disproportionate incidence in the east and within minority ethnic communities and lone female parents.
- **Disability** –A range of benefits and allowances (e.g. Incapacity Benefit, Severe Disablement Allowance) are claimed by a large number of disabled people of working age. It is recognised that people claiming these benefits are effectively economically inactive.
- **Homelessness** – This may prevent people from working. The homeless register shows an over representation of lone female parents; young people aged 16-24; and; Black or Black British people – three times their size in the local population.

3) What other evidence or data will you need to support your conclusions and how do you propose to fill the gap?

Additional evidence/data will come following the first year of the implementation of the scheme.

Step Three: Assessment of Impact

Instruction: Using the information you have gathered and analysed in step 2, you should assess whether and how the proposal you are putting forward will affect any of the existing barriers facing people who have any of the characteristics protected under the Equality Act 2010. State what actions you will take to address any potential negative effects your proposal may have on them.

1) How will your proposal affect existing barriers? (Please tick below as appropriate and use the space to explain why)

Increase barriers? X

Reduce barriers?

No change?

For explanation of the impact see table below.

2) What specific actions are you proposing in order to reduce the existing barriers and imbalances you have identified in Step 2?

In transferring the Social Fund scheme to local control, the DWP gave Local Authorities the power to amend eligibility criteria and other key aspects of the scheme. Haringey has made a positive choice to keep the scheme open to many people as we are able to and mirror much of the current scheme principles.

Although the DWP has been unable to provide us detailed information specific to Haringey, we have used the data we have coupled with known information about the borough to complete the below tables showing how we expect the different groups will be impacted and the mitigation we are planning to take.

Summary of impact and mitigations by protected characteristics

Impact	Mitigation
<p>Age</p> <p><u>Older People</u> Older people are under- represented in using the Social Fund at present. Reasons for under usage could be lack of knowledge of the fund and cultural/historical reluctance to apply for grants. It is envisaged that older people moving out of hospital or supported accommodation could need assistance with replacing some household goods or need specific items which are not medical equipment but which could make independent living easier following a all or exacerbation of impairment related needs. Another potential reason for low applications is that it can take between 4-6 weeks for community care grants to be processed and this is too long to assist older people moving back into their homes from hospital or re-enablement services who need a small household item within days rather than weeks.</p> <p><u>Young people</u> Young people are over represented in</p>	<ul style="list-style-type: none"> • Older people are at present excluded from the welfare reform changes affecting working age benefits. • Older people's specific benefits are largely unaffected (cold weather payments, pensions, council tax benefit for over 65s). • Under the proposed scheme, individual circumstances will be considered so those in financial need will be prioritised irrespective of age. • Children leaving care received a leaving care grant to assist with the purchase of

Impact	Mitigation
<p>their usage of Social fund to date. There are some additionally vulnerable groups of young people whose additional needs may need to be recognised.</p> <p>A proportion of young people who have grown up in Public Care may not have seen family budgeting and are likely to struggle more with managing their finances,</p> <p>Young parents may have additional needs and are more likely to have priority circumstances or financial needs for example if the young parent is struggling and the child has been identified as a Child in Need or has a child protection plan or if the parent has lived in temporary or hostel accommodation.</p>	<p>household goods so would not be reliant on community care grants when leaving foster or residential care.</p> <ul style="list-style-type: none"> • Young people leaving care and struggling to manage their budgets may need to be prioritised as vulnerable for Emergency payments. • Young parents with additional needs would be in priority category for assistance
Sex (formerly gender)	
<p>DWP data shows an over representation of claims from single men. This is potentially a result of men over the age of 30 being more likely to sustain an unsettled way of life compared to women and many have difficulty in managing their money if they have been in a homelessness hostel or lived in temporary accommodation for a long period. People leaving prison and young offenders institutions are more likely to be men.</p> <p>People leaving prison and young offenders institutions and likely to present for assistance are more likely to be men.</p> <p>Lone and young parents are likely to be women, households with children.</p> <p>People fleeing domestic violence are more likely to present for assistance. women are more likely to fall into this category.</p>	<ul style="list-style-type: none"> • By an agreement by all London Boroughs, their local Support Funds will support people leaving prison with funding coming from the individual's home borough rather than where they are being placed in. Additional support will be given via signposting to other appropriate agencies. • People leaving prison and young offenders institutions will be seen as a priority group. • Lone and young parents with children and people fleeing domestic violence will be considered as a priority group.
Disability	
<p>Because disabled people are more likely to be in residential care or at risk of returning to residential care than non-disabled people and we would anticipate a high demand for Local Crisis and Prevention for disabled people.</p> <p>The households identified as being vulnerable, or having priority</p>	<p>We will consider the low take up of the scheme amongst disabled people and support them via funding from the scheme and signposting as appropriate.</p>

Impact	Mitigation
<p>circumstances or being less likely to be able to manage their finances would include a significant proportion of disabled people.</p> <p>However, DWP data shows that a higher proportion of applicants for both Crisis Loans and Community Care Grants are not disabled.</p>	
Race /ethnicity	
<p>DWP and Community Care Grant data both show a higher proportion of White groups receiving Crisis Loans and Community Care Grant respectively than any other racial category.</p> <p>Black and minority ethnic (BME) communities are over represented amongst Benefit claimants and are therefore likely to be significantly affected by the current Welfare Reform changes. We would expect to see a rise in applications coming from this group.</p>	<p>The Support Fund is a universal provision and as such, we will make no specific provision on the basis of race/ethnicity but will offer appropriate signposting in each case, in light of individual's circumstances and where necessary.</p>
Pregnancy and maternity	
<p>The DWP has not provided data on applicants' pregnancy and maternity status and data on this protected characteristic is not collected locally.</p>	<ul style="list-style-type: none"> • The DWP continues to have responsibility for a regulated scheme which provides entitlement to maternity, funeral, cold weather and winter fuel payments for people who satisfy certain qualifying conditions. Therefore women who are pregnant will not be affected by the change to the Support Fund. • Households that include a pregnant women or young children will be seen as a priority group when considering eligibility.
Religion and belief	
<p>The DWP has not provided data on applicants' religion or belief and data on this protected characteristic is not collected locally.</p>	<p>We will make no specific provision on the basis of religion or belief but will offer appropriate signposting in each case, in light of individual's circumstances and where necessary.</p>
Sexual Orientation	
<p>The DWP has not provided data on applicants' sexual orientation and data on this protected characteristic is not collected locally.</p>	<p>We will make no specific provision on the basis of sexual orientation but will offer appropriate signposting in each case, in light of individual's circumstances and where necessary.</p>
Marriage and Civil Partnership	
<p>The DWP has not provided data on applicants' marital or civil partnership status and data on this protected characteristic is not collected locally.</p>	<p>We will make no specific provision on the basis of marriage or civil partnership status but will offer appropriate signposting in each case, in light of individual's circumstances and where</p>

Impact	Mitigation
	necessary.
Protected characteristic: Gender Reassignment	
The DWP has not provided data on applicants' gender reassignment status and data on this protected characteristic is not collected locally.	We will make no specific provision on the basis of gender reassignment but will offer appropriate signposting in each case, in light of individual's circumstances and where necessary.

3) If there are barriers that cannot be removed, what groups will be most affected and what Positive Actions are you proposing in order to reduce the adverse impact on those groups?

The scheme is intended to be a support for people in short term need or immediate crisis. The main barriers that cannot be removed are the limited budgets which will not be sufficient to support every applicant for assistance. In mitigation, all applicants (whether successful in receiving an award of not) will be signposted to other areas of support and assistance such as debt management (via the Money Advice Trust), food banks and childcare facilities.

Step Four: Consult on the proposal

Instruction: Consultation is an essential part of an impact assessment. If there has been recent consultation, which has highlighted the issues you have identified in Steps 2 and 3, use it to inform your assessment. If there has been no consultation relating to the issues, then you may have to carry out consultation to assist your assessment. Make sure you reach all those who are likely to be affected by the proposal. Potentially these will be people who have some or all of the characteristics listed below and mentioned in the Equality Act 2010:

- Age
- Disability
- Gender Re-assignment
- Marriage and Civil Partnership
- Pregnancy and Maternity
- Race, Religion or Belief
- Sex (formerly Gender) and
- Sexual Orientation

Do not forget to give feedback to the people you have consulted, stating how you have responded to the issues and concerns they have raised.

1) Who have you consulted on your proposal and what were the main issues and concerns from the consultation?

There is no statutory requirement placed on the Council to consult on the provision of a local scheme. However Haringey engaged in ongoing consultation in the following ways:

- Discussions were held with various voluntary sector organisations as listed in the full report on the design and potential operation of the scheme.
- Data was gathered from claimants currently based in temporary accommodation to understand if they have previously made use of the scheme.
- Haringey were part of a London wide learning group with other Boroughs and the DWP.

Over the first year of implementation data will be gathered on claimants to fully understand the impact of the scheme on the different groups.

2) How, in your proposal have you responded to the issues and concerns from consultation?

As per the information contained in the full report, eligibility criteria is largely mirroring that of the current scheme, this will allow for most claimants to continue receiving the same level of support. We will gather data over the first year of implementation and use this to make any necessary changes to the key principles of the scheme.

3) How have you informed the public and the people you consulted about the results of the consultation and what actions you are proposing in order to address the concerns raised?

The scheme will be publicised through the Council website and via referrals from trusted agencies and partners.

Step Five: Addressing Training

Instruction: The equalities issues you have identified during the assessment and consultation may be new to you or your staff, which means you will need to raise awareness of them among your staff, which may even training. You should identify those issues and plan how and when you will raise them with your staff.

1) Do you envisage the need to train staff or raise awareness of the equalities issues arising from any aspects of your proposal and as a result of the impact assessment, and if so, what plans have you made?

The issues identified in this EqIA will be raised with relevant managers and staff through briefings and team meetings. Where specific training needs are identified, arrangements will be made for them needs to be met.

All Revenues, Benefits and Customer Services staff who deal with claimants either face to face, on the phone or in the Back Office when processing applications will be trained and made aware of the changes and likely impact to claimants.

Step Six: Monitoring Arrangements

Instruction: If the proposal is adopted, there is a legal duty to monitor and publish its actual effects on people. Monitoring should cover all the protected characteristics detailed in Step 4 above. The purpose of equalities monitoring is to see how the proposal is working in practice and to identify if and where it is producing disproportionate adverse effects and to take steps to address those effects. You should use the Council's equal opportunities monitoring form which can be downloaded from Harinet. Generally, equalities monitoring data should be gathered, analysed and reported quarterly, in the first instance to your DMT and then to the Corporate Equality Board.

- 1) What arrangements do you have or will put in place to monitor, report, publish and disseminate information on how your proposal is working and whether or not it is producing the intended equalities outcomes?**
- **Who will be responsible for monitoring?**
 - **What indicators and targets will be used to monitor and evaluate the effectiveness of the policy/service/function and its equalities impact?**

- **Are there monitoring procedures already in place which will generate this information?**
- **Where will this information be reported and how often?**

The scheme will be reviewed and we have the option of changing it on an annual basis if we feel this is appropriate. As part of the changes a review of Support Fund application forms will be undertaken to ensure they include the equality information we need to monitor the impact of the scheme. Existing Council policy on equality monitoring will be followed.

Step Seven: Summary of Impact

Instruction: In the table below, summarise for each diversity strand the impacts you have identified in your assessment.

Age	Disability	Race (Ethnicity)	Sex (Gender)	Religion or Belief	Sexual Orientation	Gender Reassignment	Marriage and Civil Partnership	Pregnancy and Maternity
<p>Older people are under represented in using the scheme at present.</p> <p>Young people, in particular men over the age of 30, are over represented in their use of the scheme at present.</p>	<p>Disabled people are under-represented in the scheme at the moment.</p>	<p>White Groups are over represented in using the scheme at the moment.</p>	<p>Single men are over represented in using the scheme at present.</p>	<p>The DWP has not provided data about the religion or belief of applicants.</p>	<p>The DWP has not provided data about the sexual orientation of applicants.</p>	<p>The DWP has not provided data about the gender reassignment status of applicants.</p>	<p>The DWP has not provided data about the marriage and civil partnership status of applicants.</p>	<p>The DWP has not provided data about applicants pregnancy or maternity status.</p>

Step Eight: Summarise the actions to be implemented**Instruction:** Please list below any recommendations for action that you plan to take as a result of this impact assessment.

Issue	Action required	Lead person	Timescale	Resource implications
All groups	Scheme eligibility will be clearly publicised and applicants informed of whether or not an award has been made.	Head of Revenues, Benefits and Customer Services	To be implemented from April 2013	Within existing resources
Monitoring of impact of the scheme	The scheme will be monitor to understand the impact on all groups. Data will be collected in relation to protected characteristics	Head of Revenues, Benefits and Customer Services	April 2014	Within existing resources

