



**Haringey Council**

## Equality Impact Assessment

<b>Name of Project</b>	Local welfare assistance	<b>Cabinet meeting date <i>If applicable</i></b>	
<b>Service area responsible</b>	Revs and Bens/ Policy		
<b>Name of completing officer</b>	Kathryn Booth	<b>Date EqIA created</b>	
<b>Approved by Director / Assistant Director</b>	Mark Rudd	<b>Date of approval</b>	

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.

<b>Stage 1 – Names of those involved in preparing the EqIA</b>	
1. Project Lead	5.
2. Equalities / HR	6.
3. Legal Advisor (where necessary)	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 to Cabinet makes recommendations affecting future provision of welfare assistance in Haringey. These include:

- That the existing Support Fund scheme should be brought to a close, that the remaining reserves aligned with other forms of welfare assistance and support for those in financial hardship and that a clear plan is developed for how these resources will be targeted to meet existing and future support needs
- That the Council should complete a review of its DHP policy, including eligibility criteria, following announcement of the Local Government Financial Settlement
- That the Council should work with partners, including in the VCS, to develop a shared strategic response to welfare assistance

**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,**

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

<b>Stage 4 – Scoping Exercise - Service data used in this Equality Impact Assessment</b>	
<b>This section to be completed where there is a change to the service provided</b>	
<b>Data Source (include link where published)</b>	<b>What does this data include?</b>
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.**

	<b>Positive</b>	<b>Negative</b>	<b>Details</b>	<b>None – why?</b>
<b>Sex</b>	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 a high proportion of those in receipt of DHP (37%) and also represent just under a third of applicants to the Support Fund. Any changes to the eligibility criteria or funding of our local financial assistance schemes 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>	
<b>Gender Reassignment</b>			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
<b>Age</b>	Y	Y	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.	Policies do not discriminate on the basis of age?

			<p>Younger residents are more adversely affected by welfare reform 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> <p>46% of households receiving DHP in 2015 were single people without children. Lone parents represented 37% of recipients of DHP. Couples with children received just 15% of DHPs.</p>	
<b>Disability</b>	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</p>	

			<p>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 claimants with disabilities is therefore higher than average. Claimants disclosing a mental health issue represent 15% of successful awards.</p> <p>Disability information is not currently recorded for DHP claims. However, the majority of Discretionary Housing Payments currently goes to households affected by the benefit cap. As claimants of certain disabled benefits are exempt from the cap, it is unlikely that disabled claimants represent a high proportion of those receiving DHP. For example, very few disabled claimants affected by the under-occupation charge are getting DHP.</p>	
<b>Race &amp; Ethnicity</b>	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</p>	

			<p>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> <p>Information on race and ethnicity is not currently recorded for DHP claims.</p>	
<b>Sexual Orientation</b>			<p>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.</p>	<p>This protected characteristic is not disproportionately impacted by the proposed changes to the Council's financial assistance schemes</p>
<b>Religion or Belief (or No Belief)</b>			<p>In the most recent monitoring report, 46% of applicants to the Support Fund who disclosed their religion were Christian, 10% 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.</p> <p>Information on religion or belief is not currently recorded for DHP claims or Council Tax Reduction Scheme claims.</p>	<p>This protected characteristic is not disproportionately impacted by the proposed changes to the Council's financial assistance schemes</p>
<b>Pregnancy &amp; Maternity</b>			<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 and just over half of households receiving DHP in 2015 were households with children.</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.	
<b>Marriage and Civil Partnership (note this only applies in relation to eliminating unlawful discrimination (limb 1))</b>			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.**

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

**Stage 6 - Initial Impact analysis**

**Actions to mitigate, advance equality or fill gaps in information**

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.

In terms of eligibility criteria, our financial assistance schemes are already specifically targeted at vulnerable groups and those facing the greatest financial hardship. For example, Discretionary Housing Payments have been mostly used to mitigate those changes that have had the biggest impact on residents e.g. the benefit cap. It is proposed that once future finance is confirmed as part of the Local Government Financial Settlement that our financial assistance policies are reviewed including revisiting eligibility criteria. Any changes to the eligibility criteria for these schemes would need to be assessed for their equalities impact.

The Council no longer receives a specific grant for Local Welfare Assistance. The report therefore proposes closing 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. In particular, single households and disabled residents are over-represented in terms of groups currently accessing support from the scheme.

A cumulative impact analysis on the impact for different households of the national welfare reform changes will be completed by March 2016. 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. This EqlA will be updated based on these proposals.

The proposed review of our financial assistance policies will look to measure the impact of any proposed changes for the protected groups. This EqlA will be updated to reflect these proposals.

We will ensure that households that can no longer receive financial assistance through the Support Fund scheme are provided with alternative sources of support where appropriate. A clear plan, for how those eligible for support under the scheme will be supported when the current contract ends, will be brought to the Cabinet Member for Resources in March 2016 for approval. 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.

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

<b>Data Source (include link where published)</b>	<b>What does this data include?</b>
<p>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.</p> <p>The Welfare Reform Club are currently completing a cumulative impact analysis on the proposed national welfare reform changes and their impact for different groups of residents in Haringey. This EqIA will be updated to reflect the findings of this report and the impact of the Local Government Financial Settlement on our financial assistance scheme funds.</p>	

**Stage 8 - Final impact analysis**

To be completed following findings of the Welfare Reform Club cumulative impact analysis.

**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.