

# **Equality Impact Assessment**

Name of Project	Local Welfare Assistance	Cabinet meeting date If applicable	
Service area responsible	Revenues and Benefitss		
Name of completing officer	Amelia Hadjimichael	Date EqIA created	
Approved by Director / Assistant Director	Trans	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 <u>MUST</u> 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 Councils commitment to equality; please visit the Council's website.

Stage 1 – Names of those involved in preparing the EqIA	
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 1<sup>st</sup> 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?			
EqIA 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, disabilitiy, 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	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.  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.  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.	
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	Υ	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.  Younger residents are more adversely affected by welfare reform	Policies do not discriminate on the basis of age?

			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.  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.	
Disability	Y	Y	Residents in receipt of certain disability benefits are exempt form welfare reforms such as the benefit cap. However, disabled claimaints 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.	
			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.	
Race & Ethnicity	Y	Y	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.  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.	
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	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.  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.	
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.				
1 Ositive and negative impacts ident	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**

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.

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.

In terms of eligibility criteria, our Support Fund has been specifically targeted at vulnerable groups and those facing the greates 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.

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

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.

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.

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 the the subject of further conversations with Council services and our partners, including the Voluntary and Community Sector.

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

#### 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 EqIA it is proposed that households no longer able to access financial assistance throught 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.				