

## EQUALITY IMPACT ASSESSMENT

The Council has a public sector equality duty under the **Equalities Act (2010)** to have due regard to:

- Eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act
- Advance equality of opportunity between people who share those 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 applies 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.

### Stage 1 – Screening

Please complete the equalities screening form. If screening identifies that your proposal is likely to impact on protected characteristics, please proceed to stage 2 and complete a full Equality Impact Assessment (EqIA).

### Stage 2 – Full Equality Impact Assessment

An EqIA provides evidence for meeting the Council’s commitment to equality and the responsibilities under the Public Sector Equality Duty.

**When an EqIA has been undertaken, it should be submitted as an attachment/appendix to the final decision making report. This is so the decision maker (e.g. Cabinet, Committee, senior leader) can use the EqIA to help inform their final decision. The EqIA once submitted will become a public document, published alongside the minutes and record of the decision.**

Please read the Council’s Equality Impact Assessment Guidance before beginning the EqIA process.

#### 1. Responsibility for the Equality Impact Assessment

<b>Name of proposal</b>	Haringey’s Discretionary Housing Payment Policy 2020/21
<b>Service area</b>	Housing Benefits
<b>Officer completing assessment</b>	Amelia Hadjimichael
<b>Equalities/ HR Advisor</b>	Hugh Smith
<b>Cabinet meeting date (if applicable)</b>	10/03/2020
<b>Director/Assistant Director</b>	Andy Briggs

#### 2. Summary of the proposal

*Please outline in no more than 3 paragraphs*

- *The proposal which is being assessed*
- *The key stakeholders who may be affected by the policy or proposal*
- *The decision-making route being taken*

This EQIA accompanies a report seeking to approve a policy relating to Discretionary Housing Payment (DHP) Awards for 2020/21. The DHP policy will be administered by the Council to provide financial assistance not covered by the Housing Benefit and Universal Credit regulations in order to help tenants who are at risk of homelessness, to meet their housing costs. It is therefore an additional tool to enable the Council to play an important role in helping to sustain tenancy, prevent homelessness and where applicable, by helping tenants to move to more affordable accommodation. The policy is an integral part of how the Council administers the Welfare Reform Act 2012 while at the same time ensuring that the most vulnerable are afforded effective protection and the impacts 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 (otherwise known as the Bedroom Tax – a restriction on Housing Benefit for tenants of Social Landlords, who have more bedrooms than they need).

The 2020/21 policy is a continuation of previous policy. All claimants of housing benefit will be affected by this policy, therefore, all the characteristics protected by the Equality Act 2010 may be affected, however it is noted that some groups are more predominant in the benefits claimant population and are therefore more likely to be affected by this policy. These groups include Black and Minority ethnic groups, disabled people, pensioners, women (in particular single mothers), children in single parent households, unemployed people and homeless people / households in Temporary Accommodation.

### 3. What data will you use to inform your assessment of the impact of the proposal on protected groups of service users and/or staff?

*Identify the main sources of evidence, both quantitative and qualitative, that supports your analysis. Please include any gaps and how you will address these*

*This could include, for example, data on the Council's workforce, equalities profile of service users, recent surveys, research, results of relevant consultations, Haringey Borough Profile, Haringey Joint Strategic Needs Assessment and any other sources of relevant information, local, regional or national. For restructures, please complete the restructure EqIA which is available on the HR pages.*

Protected group	Service users	Staff
Sex	<p>Service data has been used to inform this EqIA. Reports &amp; Data are available to allow us to understand overall spend, to categorise award spend in terms of eligibility, and to identify who receives awards.</p> <p>For the majority of awards, this data is available broken down by sex.</p>	Staff are not affected by this policy
Gender Reassignment	<p>Service data has been used to inform this EqIA. Reports &amp; Data are available to allow us to understand overall spend, to categorise award spend in terms of eligibility, and to identify who receives awards.</p> <p>The service does not hold data in relation to gender reassignment.</p>	Staff are not affected by this policy
Age	<p>Service data has been used to inform this EqIA. Reports &amp; Data are available to allow us to understand overall spend, to categorise award spend in terms of eligibility, and to identify who receives awards.</p> <ul style="list-style-type: none"> <li>For the majority of awards, this data is available broken down by</li> </ul>	Staff are not affected by this policy

	age.	
Disability	<p>Service data has been used to inform this EqlA. Reports &amp; Data are available to allow us to understand overall spend, to categorise award spend in terms of eligibility, and to identify who receives awards.</p> <ul style="list-style-type: none"> <li>• For the majority of awards, this data is available broken down by disability.</li> </ul>	Staff are not affected by this policy
Race & Ethnicity	<p>Service data has been used to inform this EqlA. Reports &amp; Data are available to allow us to understand overall spend, to categorise award spend in terms of eligibility, and to identify who receives awards.</p> <p>For the majority of awards, this data is available broken down by race &amp; ethnicity.</p>	Staff are not affected by this policy
Sexual Orientation	<p>Service data has been used to inform this EqlA. Reports &amp; Data are available to allow us to understand overall spend, to categorise award spend in terms of eligibility, and to identify who receives awards.</p> <p>The service does not hold data in relation to sexual orientation</p>	Staff are not affected by this policy
Religion or Belief (or No Belief)	<p>Service data has been used to inform this EqlA. Reports &amp; Data are available to allow us to understand overall spend, to categorise award spend in terms of eligibility, and to identify who receives awards.</p> <p>The service does not hold data in relation to religious belief</p>	Staff are not affected by this policy
Pregnancy & Maternity	<p>Service data has been used to inform this EqlA. Reports &amp; Data are available to allow us to understand overall spend, to categorise award spend in terms of eligibility, and to identify who receives awards.</p> <p>The service does not hold data in relation to pregnancy and maternity</p>	Staff are not affected by this policy

Marriage and Civil Partnership	<p>Service data has been used to inform this EqlA. Reports &amp; Data are available to allow us to understand overall spend, to categorise award spend in terms of eligibility, and to identify who receives awards.</p> <p>The service does not hold data in relation to marriage and civil partnership</p>	Staff re not affected by this policy
--------------------------------	--	--------------------------------------

**Outline the key findings of your data analysis. Which groups are disproportionately affected by the proposal? How does this compare with the impact on wider service users and/or the borough’s demographic profile? Have any inequalities been identified?**

*Explain how you will overcome this within the proposal.*

*Further information on how to do data analysis can be found in the guidance.*

**Sex**

- Both sexes will continue to be subject to the same eligibility criteria and both 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. 78% of applicants in 2019/20 were female.
- 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. 12% of applicants are male and single. 15% of applicants are female and single.
- Limited funds in the DHP budget for 2020/21 means that these groups may be more likely to be affected by restricted amounts of DHP 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 will continue to be signposted to the various appropriate women specific employment and skills development initiatives in the borough, in addition to generic programmes to help people into work e.g. Haringey Adult Learning Services (HALS) and the College of North East London (CONEL)
- Where appropriate there will continue to be targeted signposting in place for local groups offering support that is gender specific, via The Bridge Renewal Trust, Haringey Council's Strategic Partner for the Voluntary and Community Sector (VCS)
- All groups impacted by the Benefit CAP will continue to have targeted support offered to them in terms of housing, childcare and training opportunities.

**Gender Reassignment**

- Housing Benefit applicants do not have to provide any details relating to gender reassignment. There is no evidence to suggest that gender reassignment has been a relevant factor in awarding DHPs, nor will it be in the future. We have no reason to believe that Trans individuals will be disproportionately impacted by the DHP Policy.

**Age**

- In 2019/20 awards were made to households where the lead claimant is in the following age groups:

under 25	4%	
25 – 35		26%
35-64	66%	
65+	4%	
- Housing Benefit is restricted for single claimants aged under 35 who rent from a private landlord. Their benefit is restricted to the rate allowed for shared accommodation. As such they are more

likely to claim additional funds from DHP.

- 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 DHP budget for 2020/21 means that these groups are more likely to be affected by restricted amounts of DHP 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 CAP and the Size Criteria changes) they will continue to receive individual assistance including one-to-one interviews with colleagues from Housing Services and JobCentrePlus 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)

#### **Disability**

- People with disabilities are more likely to live on low incomes and be more likely to request assistance from the DHP budget. At least 20% of applicants in 2019/20 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.

#### **Race & Ethnicity**

- 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 DHP budget. In 2019/20 43% of applicants (whose ethnicity is recorded) were Black, 23% were White British, 14% were White Other, 13% have mixed ethnicity, 3% were Asian and 3% 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 BMEs and high levels of deprivation.
- Relationships have been built with local JobCentrePlus 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

#### **Marriage & Civil Partnership**

- Housing Benefit applicants do not have to provide any details relating to marriage and civil partnership. The impact is unknown due to insufficient data.

#### **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 DHP budget.
- Housing Benefit applicants do not have to provide any details relating to sexual orientation. The impact is unknown due to insufficient data. We have no reason to believe there is any discrimination

or disproportionality in the awards of DHP in terms of sexual orientation.

**Religion or Belief (or No Belief)**

- Housing Benefit applicants do not have to provide any details relating to religious belief. The impact is unknown due to insufficient data. We have no reason to believe there is any discrimination or disproportionality in the awards of DHP in terms of religion or belief.

**Pregnancy & Maternity**

- We do not collect information about claimants' maternity status so the full impact on this characteristic is not known, however we have used the data we hold to make a consideration of the impact. It is estimated that within the Housing Benefit group, pregnant women are more likely to live on low incomes and require larger accommodation, as such they are more likely to request assistance from the DHP budget.
- 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.

**4. a) 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?**

*Please outline which groups you may target and how you will have targeted them*

Further information on consultation is contained within accompanying EqIA guidance

The service does not propose to consult on the continuation of the DHP Policy. This year no policy changes have been made. It is not envisaged that the continuation of this policy will have any adverse impact on residents and service users within the protected groups.

The DHP application forms are available in print format for non-internet users.

**4. b) 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**

*Explain how will the consultation's findings will shape and inform your proposal and the decision making process, and any modifications made?*

Consultation has not taken place in relation to changes to this policy.

**5. What is the likely impact of the proposal on groups of service users and/or staff that share the protected characteristics?**

*Please explain the likely differential impact on each of the 9 equality strands, whether positive or negative. Where it is anticipated there will be no impact from the proposal, please outline the evidence that supports this conclusion.*

Further information on assessing impact on different groups is contained within accompanying EqIA guidance

**1. Sex**

There is a larger proportion of female applicants than male applicants, meaning that the continuation of the DHP Policy is likely to have a positive impact for this group.

Positive	X	Negative		Neutral impact		Unknown Impact	
----------	---	----------	--	----------------	--	----------------	--

**2. Gender reassignment**

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

Positive		Negative		Neutral impact		Unknown Impact	X
----------	--	----------	--	----------------	--	----------------	---

**3. Age**

Those aged 35 and below, as well as older people (up to the age of 65) are more likely to be claimants, and are therefore more likely to be benefit from continued DHP funding.

Positive	X	Negative		Neutral impact		Unknown Impact	
----------	---	----------	--	----------------	--	----------------	--

**4. Disability**

Those who have a disability are more likely to be claimants and are therefore more likely to benefit from continued DHP funding. No individuals whose access to the internet is restricted by their disability will be prevented from making a DHP claim as there will be a paper-based alternative available.

Positive	X	Negative		Neutral impact		Unknown Impact	
----------	---	----------	--	----------------	--	----------------	--

**5. Race and ethnicity**

Those from a BAME background are more likely to be claimants, and are therefore more likely to benefit from continued DHP funding

Positive	X	Negative		Neutral impact		Unknown Impact	
----------	---	----------	--	----------------	--	----------------	--

**6. Sexual orientation**

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

Positive		Negative		Neutral impact		Unknown Impact	X
----------	--	----------	--	----------------	--	----------------	---

### 7. Religion or belief (or no belief) (

Data on religion or belief is not collected among claimants. There is no data to suggest that there will be a disproportionate impact on this protected characteristic group, but this will be revisited if any data emerges to suggest this is not the case.

Positive		Negative		Neutral impact		Unknown Impact	X
----------	--	----------	--	----------------	--	----------------	---

### 8. Pregnancy and maternity

Pregnant women are more likely to claim DHP, meaning that this group is more likely to benefit from continued DHP funding.

Positive	X	Negative		Neutral impact		Unknown Impact	
----------	---	----------	--	----------------	--	----------------	--

### 9. Marriage and Civil Partnership

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, but this will be revisited if any data emerges to suggest this is not the case.

Positive		Negative		Neutral impact	x	Unknown Impact	
----------	--	----------	--	----------------	---	----------------	--

### 10. Groups that cross two or more equality strands e.g. young black women

Groups who share more than one protected characteristic and are more likely to claim DHP and therefore benefit from continued DHP funding, include the following:

- BAME women
- Women with disabilities
- Pregnant BAME women
- Young women
- Older people with disabilities

### Outline the overall impact of the policy for the Public Sector Equality Duty:

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

This includes:

- a) Remove or minimise disadvantage suffered by persons protected under the Equality Act
  - b) Take steps to meet the needs of persons protected under the Equality Act that are different from the needs of other groups
  - c) Encourage persons protected under the Equality Act to participate in public life or in any other activity in which participation by such persons is disproportionately low
- Will the proposal help to foster good relations between groups who share a protected characteristic and those who do not?

The funding of Discretionary Housing Payments from Government, gave Haringey £1, 563,947 to spend in

2019/20. For 2020/21 this is expected to increase to £2,047,737, an increase of £483,790.

The Council will have to be considerate of policy when deciding which applications to award. Officers will do this by assessing the exceptionality of the application, the severity of the financial circumstances of the applicant, the likely timeframe that DHP will be needed by the applicant and the steps being taken by the applicant to resolve their financial problems. 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 DHP 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 DHP as a whole, 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.

**6. a) What changes if any do you plan to make to your proposal as a result of the Equality Impact Assessment?**

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

Outcome	Y/N
<b>No major change to the proposal:</b> the EqlA demonstrates the proposal is robust and there is no potential for discrimination or adverse impact. All opportunities to promote equality have been taken. <u>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.</u>	Yes
<b>Adjust the proposal:</b> the EqlA identifies potential problems or missed opportunities. Adjust the proposal to remove barriers or better promote equality. Clearly <u>set out below</u> 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	No
<b>Stop and remove the proposal:</b> the proposal shows actual or potential avoidable adverse impacts on different protected characteristics. The decision maker must not make this decision.	No

**6 b) Summarise the specific actions you plan to take to remove or mitigate any actual or potential negative impact and to further the aims of the Equality Duty**

Impact and which	Action	Lead officer	Timescale
------------------	--------	--------------	-----------

<b>protected characteristics are impacted?</b>			
Will affect all characteristics Limited funds May need to pay less or award for shorter periods	Monitor closely and encourage people to engage better with support services.	Amelia Hadjimichael	Next 12 months
Potential for digital exclusion associated with online application process, affecting older and disabled residents and those on lower incomes	Offline application forms will be available on request from Haringey's Customer Service Centres and this option will be well signposted.	Amelia Hadjimichael	Next 12 months

**Please outline any areas you have identified where negative impacts will happen as a result 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 them.**

**6 c) Summarise the measures you intend to put in place to monitor the equalities impact of the proposal as it is implemented:**

The Council will continue throughout 2020/21 to monitor successful and unsuccessful awards against protected characteristics, to ensure that no group (where data is available) is more affected than any other.

The Council will where possible, canvass applicants who have been awarded Discretionary Housing Payment, and who subsequently return to have the award renewed, as to why their circumstances have not changed since they were last signposted for support. This will alert the Council as to whether signposting has been effective, and where signposting has been most and least effective.

**7. Authorisation**

EqlA approved by Andy Briggs (Assistant Director/ Director)	Date 17 <sup>th</sup> February 2020
--	-------------------------------------

**8. Publication**

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

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