

TEMPLATE 2 - Full Equality Impact Assessment (EqIA)

In order to carry out this assessment, it is important that you have completed the EqIA E-learning Module and read the Corporate Guidelines on EqIAs. Please refer to these to assist you in completing this form and assessment.

What are the proposals being assessed? (Note: 'proposal' includes a new policy, policy review, service review, function, strategy, project, procedure, restructure)	Changes to the Discretionary Housing Payment (DHP) Policy
Which Directorate / Service has responsibility for this?	Housing Benefits and Council Tax Collections
Name and job title of lead officer	Fern Silverio, Head of Service, Collections and Housing Benefits
Name & contact details of the other persons involved in the EqIA:	Jenny Townsley, Housing Benefits Service Manager Jennifer.townsley@harrow.gov.uk Tel: 020 8424 1813 This draft policy has been developed following discussion groups with Housing, Children's, Adults, Economic Development, Customer Services and Housing Associations. In addition discussions were also held with the Welfare Reform governance structure which includes a cross council Officer Working Group and an Officer and Member Steering Group.
Date of assessment:	13 th June, 2013

Stage 1: Overview

<p>1. What are the aims, objectives, and desired outcomes of your proposals?</p> <p>(Explain proposals e.g. reduction / removal of service, deletion of posts, changing criteria etc)</p>	<p>The Discretionary Housing Payment Policy is being updated to reflect the increase in government funding which is being provided to support housing costs for Housing Benefit households impacted by the welfare reforms.</p> <p>The DHP is a centrally funded ring fenced grant which supports Local Authorities in providing additional financial assistance for housing costs for Housing Benefit households. From April 2013 this is extended to include households in receipt of Universal Credit Housing Costs (UCHC). The allocation of the fund is restricted by statute however there is a discretionary element that allows the Local Authority to target spend within the legislative framework.</p>
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The Discretionary Housing Policy has been updated to reflect the legislative changes which are based on criteria for allocation of the fund. The DHP aligns with other discretionary pots of funding that sit within the Harrow Help Scheme to ensure the most effective use of available funding to support people in need across the Council.

The principles of the policy are:

- To provide short-term support to assist long-term, sustainable financial independence
- To provide long term support where a household's circumstances are deemed to be such that sustainable financial independence is not an options, e.g. due to disability
- To align with the Harrow Help Scheme, Emergency Relief Scheme, HRA Hardship Fund and Xcite Employment Support Grant.
- To support the Homelessness Strategy and help reduce poverty in the borough
- To help support residents into work
- To reduce the risk to health and safety of households
- To support safeguarding of children and adults and promoting family

The consultation has been based upon the principles of the policy and the qualifying criteria for access to the fund. The consultation and survey are an appendix to the Cabinet Report.

Following the consultation there are no changes to the proposals put to Cabinet.

2. What factors / forces could prevent you from achieving these aims, objectives and outcomes?

- Risk that the need outweighs the funding allocation
- Future year funding allocation unknown

3. Who are the customers? Who will be affected by this proposal? For example who are the external/internal customers, communities, partners,

The primary impact of the allocation of the DHP funding will be positive as it will be supporting households receiving Housing Benefit who also fall into the qualifying criteria. The groups who previously were able to access DHP will still be able to access within this Policy. However the funding is limited and therefore if the funding is allocated before the end of the year there could be a negative impact for these groups.

stakeholders, the workforce etc.	Those groups of households who receive Housing Benefit and do not sit within the qualifying criteria could be impacted by this policy as they may not be able to access this support however there is some discretion within the policy and each individual case will be judged on its own merits. We are unable to identify who these customers are.
<p>4. Is the responsibility shared with another department, authority or organisation? If so:</p> <ul style="list-style-type: none"> • Who are the partners? • Who has the overall responsibility? 	The Collections and Benefits Service has overall responsibility for the delivery of the DHP Policy however the team have been working with other Council Services to ensure involvement in the development of the draft policy. The services that have been involved to date are Housing, Children, Economic Development and Customer Services.
4a. How are/will they be involved in this assessment?	N/A
Stage 2: Monitoring / Collecting Evidence / Data	
<p>5. What information is available to assess the impact of your proposals? Include the actual data, statistics and evidence (including full references) reviewed to determine the potential impact on each equality group (protected characteristic). This can include results from consultations and the involvement tracker, customer satisfaction surveys, focus groups, research interviews, staff surveys, workforce profiles, service users profiles, local and national research, evaluations etc</p> <p>(Where possible include data on the nine protected characteristics. Where you have gaps, you may need to include this as an action to address in the action plan)</p>	
Age (including carers of young/older people)	<p>Housing Benefit is payable to Pensioners and Working Age residents. 17,099 households are in receipt of Housing Benefit of which 13,827 are working age. Discretionary Housing Payment can be awarded to pensioners and working age, but the increase in funding is to address the impact of the welfare reforms which most harshly affect the working age.</p> <p>52.1% of Housing Benefit households have children. 98.7% of households forecast as impacted by the benefit cap have children. 25.6% of households impacted by the size criteria have children. DHP funding has been increased to support these households</p>

Disability (including carers of disabled people)	In respect to the welfare reforms that will result in increased DHP applications, no households with a disabled claimant, partner or dependent child will be classified as disabled under the Housing Benefit regulations will be capped as these households are exempt from the Benefit Cap. 25% of households impacted by the size criteria are in receipt of Disability Living Allowance.			
Gender Reassignment	This data is not currently available			
Marriage / Civil Partnership	This data is not currently available			
Pregnancy and Maternity	This data is not currently available			
Race	This data is not currently available			
Religion and Belief	This data is not currently available			
Sex / Gender	This data is not currently available			
Sexual Orientation	This data is not currently available			
6. Is there any other (local, regional, national research, reports, media) data sources that can inform this assessment? Include this data (facts, figures, evidence, key findings) in this section.	A report is currently being developed to analyse the impacts of the welfare reforms. This information will not be available to inform this EqIA. However, it will inform the ongoing implementation of the proposed DHP policy.			
7. Have you undertaken any consultation on your proposals? (this may include consultation with staff, members, unions, community / voluntary groups, stakeholders, residents and service users)	Yes	X	No	
<p>NOTE: If you have not undertaken any consultation as yet, you should consider whether you need to. For example, if you have insufficient data/information for any of the protected characteristics and you are unable to assess the potential impact, you may want to consult with them on your proposals as how they will affect them. Any proposed consultation needs to be completed before progressing with the rest of the EqIA.</p> <p>Guidance on consultation/community involvement toolkit can be accessed via the link below http://harrowhub/info/200195/consultation/169/community_involvement_toolkit</p>				
Who was consulted?	What consultation methods were	What do the results show about	What action are you going to take as a	

	used?	the impact on different equality groups (protected characteristics)?	result of the consultation? This may include revising your proposals, steps to mitigate any adverse impact. <i>(Also Include these in the Improvement Action Plan at Stage 5)</i>
Residents – DHP applicants (successful and non-successful), voluntary organisations, internal services, Registered Social Landlords	Specific web pages that included online form, circulation of consultation document with survey, face to face discussions	The majority of respondents have been positive about the development of the draft policy. No adverse feedback has been received in respect to protected characteristics	As completed in stage 5.

Stage 3: Assessing Impact and Analysis

8. What does your information tell you about the impact on different groups? Consider whether the evidence shows potential for differential impact, if so state whether this is an adverse or positive impact? How likely is this to happen? How you will mitigate/remove any adverse impact?

Protected Characteristic	Positive	Adverse	Explain what this impact is, how likely it is to happen and the extent of impact if it was to occur.	What measures can you take to eliminate or reduce the adverse impact(s)? E.g. consultation, research, implement equality monitoring etc (Also Include these in the Improvement Action Plan at Stage 5)
Age (including carers of young/older people)	X		Benefit cap impacts working age families with children. Size criteria impacts working age.	The DHP policy seeks to maximise the available assistance to the impacted households, mitigating the impacts of welfare reform.
Disability (including carers of disabled people)	X		Size criteria impacts working age and disabled households are not excluded.	The DHP policy seeks to maximise the available assistance to the impacted households, mitigating the impacts of welfare reform.

9. **Cumulative impact** – Are you aware of any cumulative impact? For example, when conducting a major review of services. This would

The broad programme of welfare reforms will impact on Housing Benefit households in Harrow, reducing the level of benefit payable

<p>mean ensuring that you have sufficient relevant information to understand the cumulative effect of all of the decisions.</p> <p>Example: A local authority is making changes to four different policies. These are funding and delivering social care, day care, and respite for carers and community transport. Small changes in each of these policies may disadvantage disabled people, but the cumulative effect of changes to these areas could have a significant effect on disabled people's participation in public life. The actual and potential effect on equality of all these proposals, and appropriate mitigating measures, will need to be considered to ensure that inequalities between different equality groups, particularly in this instance for disabled people, have been identified and do not continue or widen. This may include making a decision to spread the effects of the policy elsewhere to lessen the concentration in any one area.</p>	<p>to those affected. In addition other reforms will further reduce available household income, such as Council Tax Support.</p> <p>The Discretionary Housing Payments policy has been aligned with other discretionary funding pots to maximise available support to affected residents under the umbrella of the Help Scheme.</p>		
<p>10. How do your proposals contribute towards the requirements of the Public Sector Equality Duty (PSED), which requires the Council to have due regard to eliminate discrimination, harassment and victimisation, advance equality of opportunity and foster good relations between different groups.</p> <p>(Include all the positive actions of your proposals, for example literature will be available in large print, Braille and community languages, flexible working hours for parents/carers, IT equipment will be DDA compliant etc)</p>			
Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010	Advance equality of opportunity between people from different groups	Foster good relations between people from different groups	Are there any actions you can take to meet the PSED requirements? (List these here and include them in the Improvement Action Plan at Stage 5)
The policy has been developed through working in partnership with other services and organisations and therefore the criteria is inclusive.	Consultation was carried out with residents and services and voluntary organisations and no issues were raised regarding equality.	Internal service and the voluntary sector were consulted to ensure all appropriate groups were represented.	Please see stage 5 of the report

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11. Is there any evidence or concern that your proposals may result in a protected group being disadvantaged (please refer to the Corporate Guidelines for guidance on the definitions of discrimination, harassment and victimisation and other prohibited conduct under the Equality Act)?

	Age (including carers)	Disability (including carers)	Gender Reassignment	Marriage and Civil Partnership	Pregnancy and Maternity	Race	Religion and Belief	Sex	Sexual Orientation
Yes									
No	X	X	X	X	X	X	X	X	X

If you have answered "yes" to any of the above, set out what justification there may be for this in Q12a below - link this to the aims of the proposal and whether the disadvantage is proportionate to the need to meet these aims. (You are encouraged to seek legal advice, if you are concerned that the proposal may breach the equality legislation or you are unsure whether there is objective justification for the proposal)

If the analysis shows the potential for serious adverse impact or disadvantage (or potential discrimination) but you have identified a potential justification for this, this information must be presented to the decision maker for a final decision to be made on whether the disadvantage is proportionate to achieve the aims of the proposal.

If there are adverse effects that are not justified and cannot be mitigated, you should not proceed with the proposal. (select outcome 4)
If the analysis shows unlawful conduct under the equalities legislation, you should not proceed with the proposal. (select outcome 4)

Stage 4: Decision

12. Please indicate which of the following statements best describes the outcome of your EqlA (tick one box only)

Outcome 1 – No change required: when the EqlA has not identified any potential for unlawful conduct or adverse impact and all opportunities to enhance equality are being addressed.	
Outcome 2 – Minor adjustments to remove / mitigate adverse impact or enhance equality have been identified by the EqlA. <i>List the actions you propose to take to address this in the Improvement Action Plan at Stage 5</i>	
Outcome 3 – Continue with proposals despite having identified potential for adverse impact or missed opportunities to enhance equality. In this case, the justification needs to be included in the EqlA and should be in line with the PSED to have 'due regard'. In some cases, compelling reasons will be needed. You should also consider whether there are sufficient plans to reduce the adverse impact and/or plans to monitor the impact. (explain this in 12a below)	
Outcome 4 – Stop and rethink: when there is potential for serious adverse impact or disadvantage to one or more protected groups. (You are encouraged to seek Legal Advice about the potential for unlawful conduct under equalities legislation)	

12a. If your EqlA is assessed as outcome 3 or have ticked

'yes' in Q11, explain your justification with full reasoning to continue with your proposals.

Stage 5: Making Adjustments (Improvement Action Plan)

13. List below any actions you plan to take as a result of this impact assessment. This should include any actions identified throughout the EqIA.

Area of potential adverse impact e.g. Race, Disability	Action proposed	Desired Outcome	Target Date	Lead Officer	Progress
At this stage there have been no adverse impacts identified.	When the proposed policy is implemented, monitoring will be carried out to ensure the policy is not adversely affecting any groups.	Identify and address potential adverse impacts	Ongoing	Fern Silverio	

Stage 6 - Monitoring

The full impact of the decision may only be known after the proposals have been implemented, it is therefore important to ensure effective monitoring measures are in place to assess the impact.

14. How will you monitor the impact of the proposals once they have been implemented? How often will you do this? *(Also Include in Improvement*

The policy will be monitored through quarterly returns via the welfare reform governance structure and through complaints.

<i>Action Plan at Stage 5)</i>			
15. Do you currently monitor this function / service? Do you know who your service users are?	Yes	Recording and analysing complaints	No
16. What monitoring measures need to be introduced to ensure effective monitoring of your proposals? <i>(Also Include in Improvement Action Plan at Stage 5)</i>	As above		
17. How will the results of any monitoring be analysed, reported and publicised? <i>(Also Include in Improvement Action Plan at Stage 5)</i>	Through welfare reform structure which includes multi-agency steering group		
18. Have you received any complaints or compliments about the policy, service, function, project or proposals being assessed? If so, provide details.	Through the consultation positive feedback was received.		
Stage 7 – Reporting outcomes			
The completed EqlA must be attached to all committee reports and a summary of the key findings included in the relevant section within them.			
EqlA's will also be published on the Council's website and made available to members of the public on request.			
19. Summary of the assessment	Key impacts – mitigates impacts of welfare reforms for residents receiving Housing Benefit. No adverse feedback or impacts identified.		
NOTE: This section can also be used in your reports, however you must ensure the full EqlA is available as a background paper for the decision makers (Cabinet, Overview and Scrutiny, CSB etc)	Affected groups – Groups affected by welfare reform and consequently more likely to receive assistance through the DHP scheme are working age, families.		
What are the key impacts – both adverse and positive? Are there any particular groups affected more than others? Do you suggest proceeding with your proposals although an adverse impact has been identified? If yes, what are your justifications for this? What course of action are you advising as a result of this EqlA?	No adverse impacts identified, therefore recommending to Cabinet that policy is put in place		
20. How will the impact assessment be publicised? E.g. Council website, intranet, forums, groups etc	Council website.		
Stage 8 - Organisational sign Off (to be completed by Chair of Departmental Equalities Task Group)			
The completed EqlA needs to be sent to the chair of your Departmental Equalities Task Group (DETG) to be signed off.			

21. Which group or committee considered, reviewed and agreed the EqIA and the Improvement Action Plan?			
Signed: (Lead officer completing EqIA)		Signed: (Chair of DETG)	
Date:		Date:	