
REPORT FOR: CABINET

Date of Meeting:	19 January 2017
Subject:	Approval of Hardship Fund Policy
Key Decision:	Yes
Responsible Officer:	Tom Whiting, Corporate Director of Resources and Commercial
Portfolio Holder:	Councillor Adam Swersky, Portfolio Holder for Finance and Commercialisation
Exempt:	No
Decision subject to Call-in:	Yes
Wards affected:	All
Enclosures:	Appendix A – Draft Hardship Scheme Policy (previously the Harrow Emergency Scheme) Appendix B – ERS Consultation document Appendix C – Consultation Findings Report Appendix D – Equality Impact Assessment Appendix E – Harrow Law Centre response

Section 1 – Summary and Recommendations

The report provides members with the feedback from the consultation with Harrow residents & the voluntary sector, and shows how the feedback has informed the development of the revised Emergency Relief Scheme Policy, now to be known as the Harrow Hardship Fund Policy.

It also requests the new policy is adopted to dovetail with the reduced budget allocation for 2017/18.

Recommendations:

Cabinet is requested to:

1. Agree and adopt the revised Hardship Fund Policy.
2. Agree that the scheme to deliver the Policy is delivered in two parts, a recurring emergency relief fund for food, fuel, clothing and emergency travel, which will be administered by the Council or through the new Generalist Information and Advice Service (see Recommendation 4), and a fund for 2017/18 only for white goods and furniture, which will be administered within the Council.
3. Agree the savings as set out in the Financial Implications section of this report
4. Delegate authority to the Corporate Director Resources and Commercial to make the decision, following consultation with the PH for Community, Culture and Resident Engagement and PH Finance, Commercialisation and Major Contracts on whether to include the “emergency needs” part of the Hardship Scheme as part of the Generalist Information and Advice Service or remain within the Council; in effect deciding to apply the hybrid model or to simply deliver the service via the in-house team.

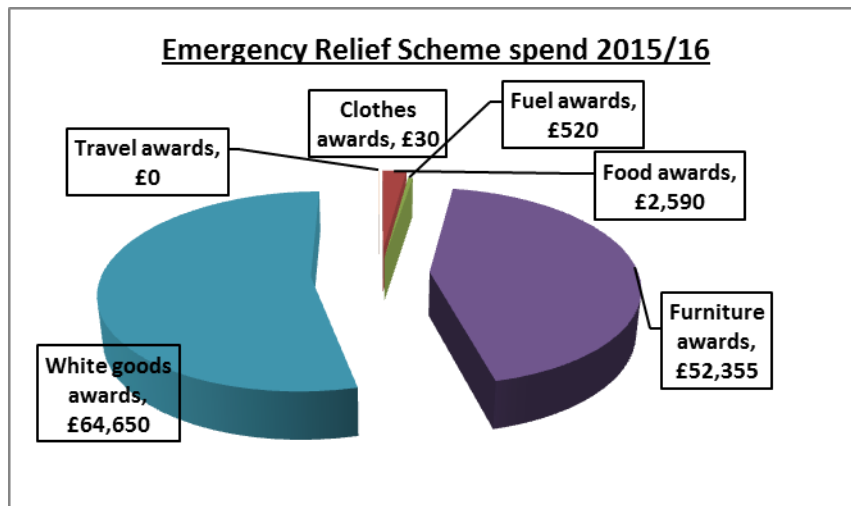
Reason: (For recommendation)

Agreeing the above will support the 2017/18 budget process and protect those requiring very specific support of last resort.

Section 2 - Report

Introductory paragraph

- 2.1 As part of the overall Welfare Reforms the Council consulted on and implemented the Emergency Relief Scheme (ERS) as a mitigation to support those impacted. The scheme was first introduced on 1/4/2013. The existing Emergency Relief Scheme provides assistance to residents both through financial and in-kind awards for emergency items such as food, fuel and furniture but also by referring people to advice services for support with matters such as debt/money advice.
- 2.2 As part of the 2017/18 budget process, the existing budget for the ERS scheme is being reduced from £270k to £115k. This means that after removing administration, staff & IT costs the programme funding budget (the money used to pay for awards to applicants) is being reduced from £200k to £115k. It should be noted that approximately £120k was spent on awards in 2015/16, the majority of the spend, £117k or 97.5%, on white goods and furniture. The breakdown of the spend is shown below.



So far in 2016/17 applications are down in comparison with the previous year, 338 as at 1/12/16, with 134 awards given, equating to around £47k. The full year forecast is therefore likely to be 507 applications, 201 awards totalling to an expected spend of £65k.

- 2.3 We have consulted on changes to the ERS scheme and are proposing merging the reduced budget for the Scheme with the funding for commissioning the new generalist Information and Advice service; in effect we are re-orienting the way we support residents to be more effective for those with greatest need. We also consulted the VCS regarding re-directing funds to ensure the sustainability of a generalist advice service, whose role will be to better prevent people from getting into crisis situations (this being part of a separate but complimentary Cabinet report).
- 2.4 The overall proposed changes will enable more effective use of funds through preventative measures in place of a reactionary approach. Resources will be concentrated on the delivery of an Information and Advice service to provide an early intervention service to prevent people's issues from becoming exacerbated. By potentially incorporating part of the new Hardship Scheme into the Information and Advice service, a more holistic support can be offered which will bring together financial assistance alongside the provision of advice, thus removing the need to refer.
- 2.5 To enable funds to be directed where they are expected to have greatest impact, it is proposed awards will in future be funded from two separate funds.

Fund 1 will be focused upon food, fuel, clothing and emergency travel, and will be allocated £10,000. In 2015/16 the scheme awarded £3,000 for these items. The allocated funding substantially exceeds existing and historical spend regarding this category of spend.

This area may, subject to Officer decision in consultation with the relevant Portfolio Holders at a later date, be administered through the Generalist Information and Advice service. This funding pot will also allow for awards of white goods & furniture, but in exceptional

circumstances only, as it is anticipated the £10k funding will mainly be spent on emergency needs.

Fund 2 will cover “white goods & furniture” and it is proposed to allocate funding of up to £105,000 for 2017/18 only to this area which compares favourably with the spend in 2015/16 (£120k) and is well above the forecasted expenditure for 2016/17 (£65k). As the funding is allocated for 2017/18 only, the Council will keep the scheme under review to decide whether funding should be made available from 2018/19. This review will be based on evidence of need for this type of service and the demand which the Council has seen for the support offered through the scheme.

It is expected this area of the service will be administered internally, either within the Housing Benefits Team or from the Housing Needs service.

In order to implement the above, the Council has consulted on a revised scheme policy. At Appendix A you will find our proposed revised Hardship Scheme policy.

2.6 Options Considered

2.7 Due to the Council’s financial position, although not reducing the budget for the service was considered, this was not seen as a viable option. Harrow accepts that this service will need to support the most financially vulnerable residents in the borough, but it also acknowledges that the budget must be reduced taking into account the current funding gap. It is also acknowledged that support must be for exceptional and short term cases only due to the availability of other existing means tested benefits to deal with low or no income applicants.

2.8 As there are clear synergies with the Hardship Scheme and the advice and support that residents receive from the Voluntary and Community Sector (‘VCS’), whilst continuing to deliver the service in-house is an option, we have included the option to administer and deliver the emergency needs part of the Hardship Scheme through the proposed Generalist Information and Advice service. The Council believes that providers of generalist information and advice services are better placed to deliver a more holistic service, and integrating the delivery of this part of the service with the Information and Advice service will ensure the most efficient use of funds by delivering emergency needs awards at the first point of contact. The consultation findings largely backs this position.

Consultation

2.9 The consultation was carried out over the period 26th September 2016 through to 31st October 2016. The consultation focussed on getting feedback on the removal of “White goods & furniture” awards from the scheme in order to reduce costs, and asked residents and

stakeholders to help shape the Hardship scheme from 2017/18 onwards. The consultation booklet and survey are attached at Appendix B.

It should be noted that whilst the consultation focused largely on removing the white goods and furniture from the scheme, the proposal for Cabinet consideration is to retain such a scheme, albeit funded for a single year at this stage.

2.10 The following consultation activity was undertaken to share information about the changes and inform residents and stakeholders on how to get involved:

- Online survey – both public and with the Voluntary and Community Sector (VCS) in respect to VCS Funding and a proposed Information, Advice & Advocacy Strategy
- Consultation pack sent to 200 residents (including 100 people who had received an award from the Emergency Relief Scheme in the last year)
- Posters and consultation packs shared with Voluntary and Community Sector organisations to share with their service users
- Posters and consultation packs made available to people in Children Centres and Access Harrow
- Visited Harrow Job Centre, St George's Shopping Centre, Foodbank, Cedars Children Centre to speak to Harrow residents
- Held workshops with various Council departments to understand what the proposals might mean for them and their service users. These departments included
 - Housing,
 - Adults,
 - Children's
 - Public Health
 - Economic Development
 - Access Harrow

2.11 Workshops were also held with the VCS as part of the wider Information, Advice and Advocacy strategy and VCS commissioning proposals, which included the delivery of the new Hardship Scheme. These workshops gave various VCS organisations the opportunity to feed into the Emergency Relief consultation. The following organisations fed into the consultation:

- MIND in Harrow,
- Citizens Advice Harrow
- Carramea
- Harrow Foodbank
- Harrow Voluntary & Community Sector Forum – respondents consisted of:
 - Capable Communities
 - Citizens Advice Harrow
 - Friends of Bentley Priory Nature Reserve
 - Harrow Domestic & Sexual Violence

- Harrow Women's Centre
- Newcleus
- South Harrow Christian Fellowship
- Talk:Harrow
- Voluntary Action Harrow Co-operative
- Hillingdon AIDS Response Trust
- Ignite Trust
- DAWN – Diwa Asian Women’s Network
- Harrow Domestic and Sexual Violence Forum
- Citizens Advice Harrow x 4
- Harrow Mencap
- Friends of Bentley Priory Nature Reserve
- 9th Kenton Scout Group
- Harrow LETS
- Harrow Foodbank was visited to capture and feed in views of volunteers working at the Foodbank.

2.12 One written response was received from Harrow Law Centre which can be seen in Appendix E.

Consultation Feedback

2.13 The feedback from the consultation has been collated and can be seen in the Consultation Findings report in Appendix C. A summary of the feedback and Harrow Council’s proposed response is given below. The proposals are set out with consideration to the outcomes from the Voluntary & Community Sector Funding and the Information, Advice and Advocacy Strategy consultations that took place simultaneously. Some of the proposals are dependent upon decisions which will be made by Cabinet prior to a decision on the Hardship Scheme. Below is a summary of the feedback:

2.14 13 (22%) of the 59 public respondents had heard of the Emergency Relief Scheme. 13 (22%) of public respondents believed that they or their dependents would be affected by the proposed changes. 21 (70%) of organisations or their representatives had heard of the scheme.

Table 2

Consultation Questions	Summary of feedback
Do you agree that the scheme should continue to provide emergency support for food, fuel, clothing and emergency travel?	Respondents said food, fuel, clothing and emergency travel should continue to be provided by the Hardship Scheme
Proposed action: Food, fuel, clothing and emergency travel will be kept as items applicants can receive assistance for within the Hardship scheme	
Are there any other items that you think should be included in the revised scheme?	Many respondents said there are no other items that should be named within the scheme or that furniture and white goods should continue to be provided within the scheme.

Consultation Questions	Summary of feedback
<p>Proposed action: The Hardship Scheme will offer food, fuel, clothing and emergency travel. Excess funds are expected to be available to support any other exceptional circumstances and the scheme allows for discretionary awards to be made. Furniture and white goods will continue to be funded for one year, with funding for further years to be determined as part of the broader 2018/19 Medium Term Financial Strategy. This part of the scheme will be administered by the Council.. Impacts of this proposed decision and mitigations are detailed later in this report.</p>	
<p>Should the revised policy have a cap on the amount of financial support that can be given in a single award, for example of £100 maximum award?</p>	<p>Respondents said a cap to the value of the awards should be applied.</p>
<p>Proposed action: A cap of £100 has been applied to the value of awards in the draft scheme, although where there is exceptional need then awards above this value can be issued. A cap of £500 will be applied to furniture and white goods awards in the new scheme.</p>	
<p>Should the revised policy continue to limit the number of awards that can be paid to two a year?</p>	<p>Respondents said that the scheme should continue to limit the awards to two a year</p>
<p>Proposed action: The number of awards that someone can be paid in year has continued to be limited to two in the draft scheme.</p>	
<p>Other comments were also made about the criteria within the scheme.</p>	<p>Most respondents who gave additional information about the criteria said the key criteria should remain unchanged. Suggested changes that were given included:</p> <ul style="list-style-type: none"> - the scheme should not be restricted to people on means-tested benefits; - the scheme should be available to people who do not have access to public funds - a new exception to the residency criteria should be added for people impacted by family breakup - the administration of the scheme should not be too onerous.
<p>Proposed action: Criteria are to remain the same except:</p> <ul style="list-style-type: none"> • New exception added to residency criteria for people impacted by family breakup • Receipt of means-tested benefit as a criteria will only be applied if demand for the scheme exceeds available funds. Means-tested benefits will be extended to include Personal Independence Payments and Child Benefit • For food, energy fuel, clothing and emergency travel, applications from people who do not have access to public funds will be considered where not providing support would breach their human rights 	

Consultation Questions	Summary of feedback
<ul style="list-style-type: none"> Administration of the scheme will be simplified by allowing the service provider to satisfy themselves of genuine need, rather than setting an evidence standard that applies in all scenarios. <p>The scheme will be monitored to ensure that the proposed changes do not create a level of demand that cannot be met within the funding pot</p>	
<p>What do you think the impact will be on people who cannot access items that are currently available from the Emergency Relief Scheme such as fridges, washing machines, cookers, beds?</p>	<p>Respondents said that the impact of removing furniture, white goods and flooring from the scheme would be very hard for some people and there would be more people living in poverty.</p> <p>The public and organisations/their representatives thought that people's health and mental wellbeing would be affected for example if they don't have a fridge to store fresh food or medication. MIND stated that people with mental health issues would be detrimentally impacted as they often don't have family or friends to support them.</p> <p>Some people thought there would not be an impact as items could be obtained elsewhere or there was not always a need.</p> <p>Harrow Law Centre asked for the funding not to be cut from £270,000 to £10,000 as they believe demand for the scheme will grow as a result of welfare reform and other council services will feel additional pressure if the scheme is reduced.</p> <p>Organisations stated that a key impact would be people in emergency accommodation being unable to take a new property if they don't have furniture to furnish it.</p> <p>Concerns were also raised about the impact on children and child poverty. Council Services including Public Health and Children's were concerned about the wider impacts on children if they are unable to have clean clothes or an environment that allowed them to do their homework.</p> <p>The combined response from Harrow Voluntary & Community Sector Forum sited potential increase in homelessness, crime and suicide as the alternative to accessing these items from the scheme</p> <p>More information on the impacts is available in the Equality Impact Assessment in Appendix D.</p> <p>Organisations also stated that there was expected to be increased pressure on other council budgets such as Children Services</p>
<p>Are there any groups of people that you think</p>	<p>Respondents said that the following groups would be most impacted by the proposed changes to the</p>

Consultation Questions	Summary of feedback
<p>will be particularly impacted by the proposed changes to the Emergency Relief Scheme?</p>	<p>scheme:</p> <ul style="list-style-type: none"> • elderly people • families with children including single parents • disabled people including those with mental health issues • low income households, • homeless households • victims of domestic abuse • people struggling to access benefits <p>More information is available in the Equalities Implications section below and the Equality Impact Assessment in Appendix D</p>
<p><i>Proposed action for above two questions:</i></p> <p>While elderly people were said to be one of the most impacted groups, only one award has actually been made to an applicant over the age of 65 in the first six months of 2016/17. The impact on this group is therefore expected to be low.</p> <p>The following activity is proposed to be undertaken to mitigate the detrimental impacts identified through the consultation:</p> <ul style="list-style-type: none"> • Food, fuel, clothing and emergency travel will be retained in the Hardship Scheme • White goods & furniture awards will be retained in the Hardship Scheme for 2017/18, but paid from a separate funding pot specifically for this purpose. • The Hardship Scheme will therefore have 2 separate funds, one fund of £10,000 for emergency cash payments & one of up to £105,000 for white goods and furniture, currently only funded for 2017/18, the total funding of £115k being in excess of current years expected spend. This will enable more households to receive assistance if required. The Council will keep the new policy under review to identify the impact of the reduced budget, particularly following implementation of the proposed new information and advice service.. • Council funds will be diverted toward more preventative activity through the proposed Information and Advice service to reduce the demand on the scheme as people are given advice to resolve their situation before they reach crisis point. • The Council's Housing Department will raise awareness amongst people waiting to be rehoused that they will need to provide their own furniture/white goods. This will give them time to source items from sources such as friends/family or through a DWP Budgeting Loan. • Harrow Council's Housing Department will work with landlords to maximise availability of white goods and furniture in properties, noting concern raised in the consultation that this could result in higher rents • The Hardship Scheme administration for food, fuel, clothing and emergency travel may transfer to the Information and Advice service provider to give applicants access to more support. The providers of Information and Advice services have greater knowledge and connections with charitable organisations that may be able to assist people in greatest need. • Providers of generalist information and advice services, which in 	

Consultation Questions	Summary of feedback
	<p>Harrow are mainly the voluntary sector, are best placed to offer holistic support to people in need. This will deliver more sustainable outcomes and potentially reducing the need for some of these households in the future</p> <p>Where there are no other options available and the need is such that the resident could be at risk if they do not receive an item, the Council will consider using alternative discretionary funds such as Discretionary Housing Payments. The scheme will be monitored to capture the impacts of the proposed changes and alternative channels for providing furniture and white goods will be explored while also allowing for a review of the scheme should it be required.</p>
<p>If you or someone you know would lose access to the Emergency Relief Scheme, how would they cope and what alternatives could they find?</p>	<p>Most respondents said people would ask family or friends for help, or turn to charities for support. Some said they would rely on other Benefits or Council Services</p> <p>In addition, some organisations made suggestions of how to increase funding and provision of second hand items</p>
<p>Proposed action:</p> <p>The proposed activity that is set out in the two previous questions will help people to access furniture and white goods from alternative sources.</p> <p>The revised Voluntary & Community Sector Funding proposals set out new funding streams for the Voluntary & Community Sector which could be considered as opportunities to raise funds or create alternative ways to support provision of furniture/white goods by charities.</p>	
<p>As the funding is only able to support a much reduced alternative scheme, who should the scheme support as a priority?</p>	<p>Respondents said the top three groups that should be prioritised were elderly, disabled including those with mental health issues and families with children.</p>
<p>Proposed action:</p> <p>It is expected that all groups will be able to access the Hardship scheme, however should demand exceed available funding then priority will be given to:</p> <ul style="list-style-type: none"> • People aged 65+ years • Disabled people including those with mental health issues (defined as someone in receipt of a disability benefit) • Families with children 	
<p>Six organisations also gave additional information about the transfer of administration of the scheme to the Voluntary and Community Sector, through its Information and Advice service</p>	<p>Five of the organisations said yes, the scheme should be administered by the Voluntary and Community Sector. The key benefits were deemed to be:</p> <ul style="list-style-type: none"> • Offer a more holistic approach to advice • VCS is better placed to understand needs of applicants • VCS has a better view of the applicants situation and therefore is better placed to assess level of need for access to the Hardship Scheme • VCS has a greater awareness of other support available to support residents

Consultation Questions	Summary of feedback
	<ul style="list-style-type: none"> • Some agencies offer out of hours services <p>Some organisations also commented:</p> <ul style="list-style-type: none"> • the administration and monitoring of the scheme should not be too onerous or costly • Funds should be spread across the year to ensure assistance was available throughout the year <p>Harrow Law Centre was opposed to the scheme being administered by the Voluntary Sector. The concerns stated are:</p> <ul style="list-style-type: none"> • Availability of support to submit an appeal against a refusal to the Hardship Scheme if the provider is an organisation that would otherwise have offered advice on how to submit an appeal • Ability of one organisation being able to reach out to all of the diverse communities within the borough • Opening hours of the provider need to support immediate need • If provider usually supports specific client groups then residents may not be aware of that organisation as a potential source of assistance • The Local Authority could leave itself open to challenge against decisions made by a third party on its behalf
<p>Proposed action:</p> <ul style="list-style-type: none"> • Administration of the Hardship Scheme for food, fuel, emergency travel and clothing may be transferred to the Information and Advice service and will be delivered through this service • Criteria have been simplified to reduce administration • Level of monitoring required will be reviewed • Scheme will require funds to be allocated on a monthly basis • In response to concerns raised by Harrow Law Centre: <ul style="list-style-type: none"> ○ Organisations across the borough representing diverse communities will be able to refer into the scheme, hence reducing the risk to groups not being approached directly by the service provider. ○ The specification will set out the need for applications to be assessed within a target of one working day, up to a maximum of two. ○ The Council sets out monitoring arrangements within third party contracts to ensure delivery standards are understood and maintained by the service provider. By adhering to this standard the risk of successful challenge is minimal. • Administration of furniture and white goods for households known to the Council's Housing Department will remain with the Council 	

Legal Implications

- 2.15 In relation to the operation of the hardship scheme, the Council has local discretion in setting criteria for the fund, however it should take account of its public law duties when making this decision. This includes taking account of the equality implications, results of the consultation and other relevant material.

Currently two full time staff are employed to deliver the service. Should all or part of the service (for example emergency need only) move to a Generalist Information and Advice provider, TUPE will apply. TUPE refers to the "Transfer of Undertakings (Protection of Employment) regulations 2006" as amended by the "Collective redundancies and Transfer of Undertakings (Protection of Employment) (Amendment) Regulations 2014.

These apply to organisations of all sizes and protect employees' rights when the organisation or service they work for transfers to a new employer.

The TUPE regulations may apply when activities are either outsourced, transferred or a contract for services is moved from one provider to another. Where TUPE applies, the contracts of employment of affected employees transfer automatically from the transferor to the transferee. Their terms and conditions of employment and continuity of service transfer with them and they also receive certain protections around dismissal and redundancy. Benefits from occupational pension schemes are excluded in the regulations, although there are particular protections for local government employees subject to outsourcing.

If TUPE does not apply to the roles not continuing or transferring, these posts would be redundant. The Council will be consulting with the two employees in accordance with the Council's managing change policy and it is hoped that these staff will be successful in moving to other roles (currently vacant) within the Collections & Housing Benefit Service.

- 2.16 In responses to the consultation, there were some requests to consider providing support to those individuals who have no recourse to public funds, as these individuals suffer particular hardship. The immigration rules set out specific categories of funding that will be considered to be public funds, including (1) a discretionary payment made by a local authority under section 1 of the Localism Act 2011. The Council must ensure that it complies with the immigration rules and must also consider whether it is appropriate to have a policy providing funds to those who are ineligible for state benefits. Individuals and families who have no recourse to public funds are supported in accordance with the Council's adults and children's social care duties where a human rights assessment has found that their human rights would be breached if support is not provided. The scheme will therefore provide support to those individuals and families where they are applying for food, energy

fuel, clothing or emergency travel and the policy has been amended to reflect this.

Financial Implications

- 2.17 The current £270k budget for the existing Emergency Relief Scheme is proposed to be pooled with those budgets supporting the VCS in order that Harrow can achieve savings and support the 2017/18 budget process.
- 2.18 Harrow's emergency needs part of the Hardship Fund Scheme will in future provide small cash and low value voucher awards only from an emergency needs budget worth £10k. Therefore the total budget reduction being made as part of this proposal is £260k, and this is within the wider savings proposal within the MTFs (Res 16), which also takes account of the investment funding for the new information and advice service.
- 2.19 The Hardship Fund will additionally have a white goods and furniture budget in 2017/18 supported by one-off funding worth £105k, through a combination of Housing Revenue Account contribution and the Council's Transformation and Priority Initiatives Fund, which will fund awards for white goods (e.g. cookers, washing machines, fridges) and furniture. Future funding for the Hardship Scheme will be decided as part of the 2018/19 Medium Term Financial Strategy.
- 2.20 It is hoped the above will deliver complementary activities that support Harrow aims with regards to those suffering financial hardship and simultaneously discharge Harrow's public law duties in dealing with unavoidable need and supporting and mitigating the impacts of Welfare Reform.

Performance Issues

- 2.21 Due to the reduction in resources, to both the Council and the voluntary sector, there is a risk that demand will outweigh the resources available for delivery of advice and support to residents signposted through the Harrow Hardship Scheme. The demand will be monitored and Officers will work with the VCS to help mitigate this.

Environmental Impact

- 2.22 There are no direct environmental impacts anticipated from the recommendations contained within this report.

Risk Management Implications

- 2.23 Although the Harrow Hardship Scheme hopes to mitigate the risk to health and safety, the overarching aim is to provide specific and immediate support from a "restricted menu". Potentially commissioning the VCS to deliver the emergency needs part of the

service on Harrow's behalf provides a more holistic support approach and will mitigate risk.

- 2.24 Reducing the spend on white goods and furniture from 2018/19 may bring a risk of "cost shunting" as customers look elsewhere in the Council for their provision. This will need to be kept under review, particularly in light of the proposed new information and advice strategy.

Equalities implications

- 2.25 A full detailed Equality Impact Assessment has been carried out in relation to the implementation of the Harrow Hardship Scheme. The Equality Impact Assessment was opened in September 2016 and has been updated to reflect feedback from the consultation.
- 2.26 When deciding on this scheme, Cabinet should have due regard to the Public Sector Equality Duty. The Council completed an equality impact assessment and a summary of results is shown below.
- 2.27 Section 149 of the Equalities Act 2010 created the Public Sector Equality Duty. Section 149 states:-
- (1) A public authority must, in the exercise of its functions, have due regard to the need to:
 - (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
 - (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
 - (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
- 2.28 When making policy decisions, the Council must take account of the equality duty and in particular any potential impact on protected groups.
- 2.29 The Equality Impact Assessment is attached at Appendix D, and the results of the impacts on the protected characteristics are summarised in table 1 below;

Table 3

Protected Characteristic	Impacted group	Impact
Age	Positive impact: <ul style="list-style-type: none"> • Age 25-44 and 45-64 • Families with children Minor adverse impact: <ul style="list-style-type: none"> • Age 25-44 and 	Positive impact for this characteristic is for those groups most likely to receive an award from the scheme. This positive impact is due to: <ul style="list-style-type: none"> • £10,000 being allocated to the Hardship Scheme for essential items such as food, fuel, clothing and emergency travel. This is three times more than is currently spent

	<p>45-64</p> <ul style="list-style-type: none"> • Families with children • Large families 	<p>on these items in the scheme.</p> <ul style="list-style-type: none"> • Up to £105,000 is being provided in 2017/18 only for white goods & furniture. This exceeds the expected spend in 2016/17. • Preventative activity through the Voluntary & Community Sector to address issues residents are experiencing at an earlier stage and before they hit crisis point • A more holistic approach from the Voluntary & Community Sector to be able to take a rounded view of the service user's needs and provide a package of support to address their needs. • A revised scheme which includes changes such as <ul style="list-style-type: none"> ○ An exception to the Residency criteria for people experiencing family breakup ○ People in receipt of child benefit being treated as a priority group ○ The means-tested criteria have been removed from the scheme (on the basis that available funds permit) enabling single people or couples without children in low-paid work to access the scheme <p>Harrow Law Centre has stated that demand for these items from the Hardship Scheme is likely to grow because of welfare reform including roll out of Universal Credit, increased use of sanctions and people caught between benefits under the Fit to Work criteria. The increase in funds in the Hardship Scheme are expected to cater for rising demand for food, fuel and basic items.</p> <p>Minor Adverse Impact on basis that mitigations are implemented and effective:</p> <p>The £500 cap on awards for furniture and white goods could result in a minor adverse impact for households in the 25-44 and 45-64 age groups and households with children. Removal of these items from the scheme in 2018/19 could also have detrimental impacts on this group. The impacts would be:</p> <ul style="list-style-type: none"> • Exacerbating child poverty: children not having a healthy diet if the home does not have a fridge or cooker and wearing dirty clothes/unclean bedding. Child poverty is known to have long lasting impacts such as affecting children's GCSE results • Increased poverty for people on low incomes and with a low standard of living
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		<ul style="list-style-type: none"> • If people take out loans to pay for goods this could lead to a cycle of debt and deprivation • People may turn to crime to obtain items they need • One respondent in the consultation thought people may become suicidal if they were unable to access furniture or white goods from the Emergency Relief Scheme <p>Large families could also be affected by the £100 cap to awards although only 1 award to a family for food or fuel in 2015/16 was above this level so this is unlikely to happen.</p> <p>While respondents expected elderly people to be impacted by the proposed changes, there are very few people aged 65+ accessing the scheme so it is not anticipated that there will be an impact on this group.</p>
Disability	<p>Positive impact:</p> <ul style="list-style-type: none"> • People with a disability • People with a mental health issue <p>Minor adverse impact:</p> <ul style="list-style-type: none"> • People with a disability • People with a mental health issue 	<p>Positive impacts are detailed in 'Age' above. Specific to the Disability characteristic a further positive impact is:</p> <ul style="list-style-type: none"> • People in receipt of disability benefits being treated as a priority group even if they are not in receipt of a means-tested benefit <p>Minor adverse impacts are detailed in 'Age' above. Specific to the Disability characteristic, impacts are possible for households whose award for furniture or white goods is capped to £500. Removal of these items from the scheme in 2018/19 could also have detrimental impacts on this group.</p> <ul style="list-style-type: none"> • People with disabilities or long term health problems who need to keep medication in the fridge would not be able to do this if they do not have one • Self neglect and greater isolation • Harrow Mencap: people may not be able to move out of residential care if they cannot access furniture or white goods. • MIND in Harrow: People with mental health concerns may be affected as they are less likely to have family or friends they can turn to for assistance <p>People with this characteristic are also more likely to be impacted as they disproportionately apply for furniture or white goods when they are not known to the Council's Housing Department. This impact is expected to be reduced and potentially removed as funding is available within the</p>

		£10,000 to support this group. It is estimated there will be 6 such awards made in a year.
Gender reassignment	<p>Positive impact:</p> <ul style="list-style-type: none"> • None known <p>Minor adverse impact:</p> <ul style="list-style-type: none"> • None known 	<p>Data is not available on this characteristic within the borough so it is not possible to state whether there would be a disproportionate impact on people within this group. There is no known information that indicates there is likely to be disproportionate impacts.</p> <p>Anyone in this characteristic who is impacted is expected to experience the same positive and minor adverse impacts as detailed in 'Age' above</p>
Marriage/Civil Partnership	<p>Positive impact:</p> <ul style="list-style-type: none"> • Single people • Lone parents <p>Minor adverse impact:</p> <ul style="list-style-type: none"> • Single people • Lone parents 	<p>Positive impacts are detailed in 'Age' above.</p> <p>Minor adverse impacts are detailed in 'Age' above. Specific to the Marriage/Civil Partnership characteristic, impacts are possible for households whose award for furniture or white goods is capped to £500. Removal of these items from the scheme in 2018/19 could also have detrimental impacts on this group:</p> <ul style="list-style-type: none"> • Single people will potentially be more affected by the proposals because they have nowhere else to turn such as Children Services or the Housing department. • People fleeing domestic abuse could be adversely impacted by this change as they will frequently not have any furniture or white goods. There is also a risk that people will not leave an abusive household if they do not believe they will be able to access these items.
Pregnancy and maternity	<p>Positive impact:</p> <ul style="list-style-type: none"> • Expected to impact people who are pregnant or on maternity leave in the last two years <p>Minor adverse impact:</p> <ul style="list-style-type: none"> • Expected to impact people who are pregnant or on maternity leave in the last two years 	<p>Harrow data is not available for this characteristic so it is not possible to confirm whether people in this characteristic. However, because there is an impact on households with children, it is expected that there would be a corresponding impact on people within the Pregnancy and Maternity characteristic.</p> <p>Positive impacts are detailed in 'Age' above.</p> <p>Minor adverse impacts are detailed in 'Age' above.</p>

Race	<p>Positive impact:</p> <ul style="list-style-type: none"> Black or Black British households White households <p>Minor adverse impact:</p> <ul style="list-style-type: none"> Black or Black British households 	<p>Positive impacts are detailed in 'Age' above. In addition this characteristic is more likely to experience positive impacts due to a proposed change to the criteria for food, energy fuel, clothing and emergency travel to the restriction to people who do not have access to public funds so it includes 'unless not providing support would breach their human rights.'</p> <p>Minor adverse impacts are detailed in 'Age' above</p> <ul style="list-style-type: none"> Carramea did not anticipate any impact on their service users if access to furniture or white goods were removed from the scheme as they do not currently receive awards from the scheme for these items.
Religion and Belief	<p>Positive impact:</p> <ul style="list-style-type: none"> Christian People stating they have no religion <p>Minor adverse impact:</p> <ul style="list-style-type: none"> Muslim Christian 	<p>Positive impacts are detailed in 'Age' above.</p> <p>Minor adverse impacts are detailed in 'Age' above.</p>
Sex	<p>Positive impact:</p> <ul style="list-style-type: none"> Women <p>Minor adverse impact:</p> <ul style="list-style-type: none"> Women 	<p>Positive impacts are detailed in 'Age' above.</p> <p>Minor adverse impacts are detailed in 'Age' above.</p>
Sexual Orientation	<p>Positive impact:</p> <ul style="list-style-type: none"> None known <p>Minor adverse impact:</p> <ul style="list-style-type: none"> None known 	

2.30 Listed below are mitigations against the potential adverse impacts detailed above. These mitigations are expected to reduce and potentially remove the adverse impacts. It should be noted however that the impact of these proposals will not be known until the revised scheme is implemented. The Council will therefore closely monitor the potential impacts of removing furniture and white goods from the scheme throughout 2017/18 as it is providing one-off funding of £105,000 to retain this part of the scheme as set out earlier in the report..

2.31 By monitoring impacts the Council will be in a position to consider opportunities for alternative provision to meet the needs of residents who are unable to source furniture/white goods outside of the Hardship Scheme. If demand is such that alternatives are not able to meet this need, then the Council will still be able to provide white goods and furniture, but this will be contingent on sufficient funding being made available for 2018/19 onwards, as currently the funding available for

white goods and furniture is for 2017/18 only as highlighted in the Financial Implications section.

- 2.32 While the funds made available are expected to be sufficient to meet demand in 2017/18, based on demand trends to date, activity will be undertaken to try to reduce future demand on the scheme through preventative work such as clearer expectations on private landlords for the provision they should be making in their housing and through earlier support through clear information and advice to prevent individuals and families reaching crisis point, which will be provided through the new Generalist Information and Advice Service. To further mitigate any impact on residents the following is proposed:
- Should the Council commission the Information and Advice Service as part of the overall Information, Advice and Advocacy strategy, the Council has diverted funds toward preventative measures through an early intervention approach with the intention of reducing the number of households that reach crisis point and require assistance from the Hardship Scheme
 - Any underspends anticipated around demand for food, fuel, clothing and emergency travel will be made available within the Hardship scheme to allow awards to be made for other items in exceptional circumstances – this will include furniture and white goods.
 - We believe the Voluntary & Community Sector have a sound knowledge of what is available in the borough to support people in emergency situations and what charitable payments may be available to them.
 - Public health information will be made available to the Voluntary & Community Sector to enable advice agencies to inform service users of what is available to assist them e.g. with healthy eating or Healthy Start vouchers for children under 4 years.
 - The Council's Housing Department will encourage landlords to provide white goods in their properties
 - The Housing Department will raise awareness with people on the Housing Waiting List of the need to source items in preparation for moving into a new property to give them time to get the items they may need
 - The Foodbank have stated that they have capacity to support more people should the need arise, although it must be noted that they are reliant on voluntary donations so this position could change
 - 22% of respondents stated people could ask for support from family or friends if they were no longer able to access items from the scheme.
 - 24% of respondents said people could use charities, the Foodbank and second hand items
 - The Council continues to work with families impacted by welfare reform, including the revised Benefit Cap to assist them in

resolving their situation without the need to rely on the Hardship Scheme.

- Where essential items cannot be accessed from other sources the Council holds other discretionary funds that can be used as a last resort.
- We will, after six months, review the effectiveness of the service with the new service provider to understand demand and actual impacts of policy change.

2.33 It has also been identified that people in lower socio economic groups are likely to be disproportionately impacted by the proposed changes to the Hardship Scheme. All awards made from the scheme are for people on low incomes without access to other sources of money such as savings. While this group will be positively impacted by the changes to the scheme in respect to food, fuel, clothing and emergency travel, there will also be a minor adverse impact due to the reduction in funding for white goods and furniture from the scheme, although demand in 2016/17 is likely to be lower than the budget being set aside for the scheme in 2017/18. The cap of £500 to awards for furniture and white goods could also have a detrimental impact. The mitigations listed above will assist all residents including those in lower socio-economic groups.

Corporate Priorities

2.34 The proposed new Harrow Hardship Fund Scheme and the proposed new delivery model supports and protects people who are most in need and as such reflects the aims of our corporate priorities.

Section 3 - Statutory Officer Clearance

Name: Dawn Calvert	<input checked="" type="checkbox"/>	Chief Financial Officer
Date: 6 January 2017		
Name: Sarah Wilson	<input checked="" type="checkbox"/>	on behalf of the Monitoring Officer
Date: 6 January 2017		

Ward Councillors notified:	NO
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EqIA carried out:	YES
EqIA cleared by:	Alex Dewsnap, Divisional Director, Strategic Commissioning

Section 4 - Contact Details and Background Papers

Contact:

Fern Silverio (Head of Service – Collections & Housing Benefits),
Tel: 020-8736-6818 / email: fern.silverio@harrow.gov.uk

Background Papers:

None

Call-In Waived by the Chairman of Overview and Scrutiny Committee	NOT APPLICABLE <i>[Call-in applies]</i>
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