

Appendix 4



Form to be used for the Full Equalities Impact Assessment

203

Service Area: Housing Services		Section: Housing Needs	Date of Initial assessment: 09/08/2021	Key Person responsible for assessment: James Pickering	Date assessment commenced: 09/08/2021		
Name of Policy to be assessed:			Discretionary Housing Payment Policy				
1. In what area are there concerns that the policy could have a differential impact			Race		Disability		Age
			Gender reassignment		Religion or Belief		Sexual Orientation
			Sex		Pregnancy and Maternity		Marriage & Civil Partnership
Other strategic/ equalities considerations			Safeguarding/ Welfare of Children and vulnerable adults		Mental Wellbeing/ Community Resilience		
2. Background: Give the background information to the policy and the perceived problems with the policy which are the reason for the Impact Assessment.			The Discretionary Housing Payment policy is intended to support those who are disadvantaged by changes to Housing Benefit rules the Housing Element of Universal Credit, specifically the under occupation rules in the social sector (aka bedroom tax), the Benefit Cap and the freezing of Local Housing Allowance rates. The under occupation rules disproportionately impact older residents (from 45 to pension age) and people with a disability. The Benefit Cap affects mainly households where there are lots of children (and in most cases a single parent). The Local Housing Allowance changes impact mainly on households with children. As such, if the DHP policy is not applied correctly, these groups could be disadvantaged.				

Appendix 4

<p>3. Methodology and Sources of Data:</p> <p>The methods used to collect data and what sources of data</p>	<p>A demographics data collection has been implemented although take up has been low. As such we are developing a new online application which we believe will increase the take up of applicants to complete the questionnaire. We continue to perform a 10% quality check on assessments (both successful and unsuccessful decisions) and review the data to identify any trends.</p>
<p>4. Consultation</p> <p>This section should outline all the consultation that has taken place on the EIA. It should include the following.</p> <ul style="list-style-type: none"> • Why you carried out the consultation. • Details about how you went about it. • A summary of the replies you received from people you consulted. • An assessment of your proposed policy (or policy options) in the light of the responses you received. • A statement of what you plan to do next 	<p>As this policy is discretionary, all applications will be considered on their merit. Where an application meets the aims of the policy, it is intended to provide support. The policy is a fairly straightforward one to apply. Cabinet should note that, as it is a discretionary payment the Council are not intending to set out any circumstances in which we definitely wouldn't support someone. If an application meets various policy aims, it will be successful.</p> <p>As we are not making significant changes to the DHP policy we have not formally consulted on the changes to the DHP policy, although we have asked partners (internal and external) for their views and suggestions for additional policy changes. The changes to the DHP policy are minor in nature, and in addition all applications are considered on their own merits, and any award made is at the discretion of the Council. As such the process of a formal consultation may raise unrealistic expectations and would be an unproductive exercise as it would not generate any information that the Council hasn't already anticipated or did not know. In the event that significant changes were planned to the DHP policy, a formal consultation exercise would be carried out.</p>

204

Appendix 4

205

<p>5. Assessment of Impact: Provide details of the assessment of the policy on the six primary equality strands. There may have been other groups or individuals that you considered. Please also consider whether the policy, strategy or spending decisions could have an impact on safeguarding and / or the welfare of children and vulnerable adults</p>			
	<p>Race Neutral</p>	<p>Disability Neutral</p>	<p>Age Neutral</p>
	<p>Gender reassignment Neutral</p>	<p>Religion or Belief Neutral</p>	<p>Sexual Orientation Neutral</p>
	<p>Sex Neutral</p>	<p>Pregnancy and Maternity Neutral</p>	<p>Marriage & Civil Partnership Neutral</p>
<p>6. Consideration of Measures:</p>	<p>No alternatives have been considered due to the resource intensive nature of other options. Please see 6a for further details.</p>		

Appendix 4

206

<p>This section should explain in detail all the consideration of alternative approaches/mitigation of adverse impact of the policy</p>					
<p>6a. Monitoring Arrangements:</p> <p>Outline systems which will be put in place to monitor for adverse impact in the future and this should include all relevant timetables. In addition it could include a summary and assessment of your monitoring, making clear whether you found any evidence of discrimination.</p>		<p>A 10% check of applications will be carried out to ensure consistency of decision making. This will be done for both successful and unsuccessful applications. Monitoring will be carried out on a monthly basis, and this will also include the reason for the application being made.</p> <p>This process has been well established and analysis has not identified any evidence of discrimination.</p>			
<p>7. Date reported and signed off by City Executive Board:</p>					
<p>8. Conclusions:</p> <p>What are your conclusions drawn from the results in terms of the policy impact</p>		<p>After consideration of the policy, its implementation and monitoring processes I do not believe there are any differential impacts on protected characteristics.</p>			
<p>9. Are there implications for the Service Plans?</p>	<p>NO</p>	<p>10. Date the Service Plans will be updated</p>		<p>11. Date copy sent to Equalities Lead Officer</p>	
<p>13. Date reported to Scrutiny and Executive Board:</p>		<p>14. Date reported to City Executive Board:</p>		<p>12. The date the report on EqlA will be published</p>	

Appendix 4

Signed (completing officer)

Signed (Lead Officer)

Please list the team members and service areas that were involved in this process:

Equalities Lead Officer
Service Manager
Lindsey Cane, Legal Services Manager

This page is intentionally left blank