

**INITIAL EQUALITY IMPACT ASSESSMENT**

<b>Name of the activity being assessed</b>	Revenues and Benefits policy changes 2019 20 – Discretionary Housing Payments policy				
<b>Directorate / Department</b>	Finance and Customer Services	<b>Service</b>	Revenues and Benefits	<b>Assessment Author</b>	Andy Ormerod
<b>Is this a new or existing activity?</b>	<input type="checkbox"/> New <input checked="" type="checkbox"/> Existing	<b>Responsible manager / director for the assessment</b>		Andy Ormerod	
<b>Date EIA started</b>	20/02/2019	<b>Implementation date of the activity</b>		01/04/2019	

**SECTION 1 - ABOUT YOUR ACTIVITY**

<b>How was the need for this activity identified?</b> i.e. Why are we doing this activity?	All Revenues and Benefits policies are reviewed annually to consider any legislative or administrative changes that may need to be implemented. During this review the Discretionary Housing Payment policy was deemed to need a minor change.				
<b>What is the activity looking to achieve?</b>  <b>What are the aims and objectives?</b>	<p>The Department of Work and Pensions guidance on the administration of the Discretionary Housing Payment scheme has previously made reference to the fact that councils should avoid awarding discretionary payments to applicants that had been sanctioned. Analysis of cases over the last 12 months has shown that increasing numbers of customers have been detrimentally affected by this exclusion, particularly if they are claiming Universal Credit.</p> <p>We are amending the policy and removing all reference to sanctions. It is hoped that this change will ensure that all residents will be treated the same during assessments.</p> <p>The Discretionary Housing Payment Policy seeks to allow applications from a broad range of groups and maximise the number of potential beneficiaries. The detailed criteria for claims take account of the different needs of groups with protected characteristics.</p>				
<b>Services currently provided</b> (if applicable)	N/A				
<b>Type of activity</b>	<input type="checkbox"/> Budget changes <input checked="" type="checkbox"/> Change to existing activity	<input type="checkbox"/> Decommissioning <input type="checkbox"/> Commissioning	<input type="checkbox"/> New activity <input type="checkbox"/> Other <a href="#">[please state here]</a>		

**SECTION 2 - UNDERSTANDING YOUR CUSTOMER****What resources will support in undertaking the equality analysis and impact assessment?**

*Please identify additional sources of information you have used to complete the EIA, e.g. reports; journals; legislation etc.*

The decision to amend the policy was taken following a review of failed or invalid applications from 2018/19 and consultation with neighbouring authorities through benchmarking meetings. The work is an integral part of the service work plan and undertaken by existing managers in the service.

**Who are you consulting with? How are you consulting with them? (Please insert any information around surveys and consultations undertaken)**

There is no requirement or need to consult on this matter. The changes to the policy are within the discretion allowed to local authorities and intended to extend the support offered through Discretionary Housing Payments.



<b>Who does the activity impact upon?*</b>	Service users	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> Indirectly			
	Members of staff	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> Indirectly			
	General public	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> Indirectly			
	Carers or families	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> Indirectly			
	Partner organisations	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> Indirectly			
<b>Does the activity impact positively or negatively on any of the protected characteristics as stated within the Equality Act (2010)?*</b>  <b>The groups in blue are not protected characteristics (please refer to p. 3 of the guidance notes)</b>	Positive impact	<input checked="" type="checkbox"/> Age	<input checked="" type="checkbox"/> Disability	<input type="checkbox"/> Gender reassignment	<input type="checkbox"/> Marriage & Civil Partnership	<input checked="" type="checkbox"/> Pregnancy & maternity	<input checked="" type="checkbox"/> <b>Vulnerable groups</b>
		<input type="checkbox"/> Race	<input type="checkbox"/> Religion or belief	<input type="checkbox"/> Sex	<input type="checkbox"/> Sexual orientation	<input checked="" type="checkbox"/> <b>Deprived communities</b>	<input type="checkbox"/> <b>Carers</b>
	Negative impact	<input type="checkbox"/> Age	<input type="checkbox"/> Disability	<input type="checkbox"/> Gender reassignment	<input type="checkbox"/> Marriage & Civil Partnership	<input type="checkbox"/> Pregnancy & maternity	<input type="checkbox"/> <b>Vulnerable groups</b>
		<input type="checkbox"/> Race	<input type="checkbox"/> Religion or belief	<input type="checkbox"/> Sex	<input type="checkbox"/> Sexual orientation	<input type="checkbox"/> <b>Deprived communities</b>	<input type="checkbox"/> <b>Carers</b>
	No impact	<input type="checkbox"/> Age	<input type="checkbox"/> Disability	<input checked="" type="checkbox"/> Gender reassignment	<input checked="" type="checkbox"/> Marriage & Civil Partnership	<input type="checkbox"/> Pregnancy & maternity	<input type="checkbox"/> <b>Vulnerable groups</b>
		<input checked="" type="checkbox"/> Race	<input checked="" type="checkbox"/> Religion or belief	<input checked="" type="checkbox"/> Sex	<input checked="" type="checkbox"/> Sexual orientation	<input type="checkbox"/> <b>Deprived communities</b>	<input checked="" type="checkbox"/> <b>Carers</b>

**\*If no impact is identified on any of the protected characteristics a full EIA may not be required. Please contact your departmental Corporate Equality & Diversity representative for further information.**

**Does the activity contribute towards meeting the Equality Act's general Public Sector Equality Duty? Refer to p.3 of the guidance for more information**  
***A public authority must have 'due regard' (i.e. consciously consider) to the following:***

DUTY	DOES THE ACTIVITY MEET THIS DUTY? EXPLAIN
<b>Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act</b> <i>(i.e. the activity removes or minimises disadvantages suffered by people due to their protected characteristic)</i>	The change to the policy will remove a potential barrier to all individuals making applications and being awarded Discretionary Housing Payments.
<b>Advance equality of opportunity between those who share a protected characteristic and those who do not</b> <i>(i.e. the activity takes steps to meet the needs of people from protected groups where these are different from the needs of other people)</i>	The change to the policy will remove a potential barrier to all individuals making applications and being awarded Discretionary Housing Payments.
<b>Foster good relations between people who share a protected characteristic and those who do not</b> <i>(i.e. the function encourages people from protected groups to participate in public life or in other activities where their participation is disproportionately low)</i>	The change to the policy will remove a potential barrier to all individuals making applications and being awarded Discretionary Housing Payments.

<b>ASSESSMENT</b>	<b>Is a full EIA required?</b>	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Please explain how you have reached your conclusion <i>(A lack of negative impacts must be justified with evidence and clear reasons, highlight how the activity negates or mitigates any possible negative impacts)</i>			
The changes proposed are intended to simply remove a barrier that has been identified by the service. Any applicant for Discretionary Housing Payments could be subject to a sanction from the DWP (irrespective of equalities characteristics). This in previous years has been a potential reason to decline applications and payments.			
This change is a positive one for all groups and individuals in the borough and will not impact any equalities group to a greater or lesser extent, and as such, a full EIA is not required.			

<b>Author Signature</b>		<b>Date</b>	<b>20/02/2019</b>
<b>Head of Service/Director Signature</b>		<b>Date</b>	<b>26/02/2019</b>
<i>The above signatures signify acceptance of the ownership of the Initial EIA and the responsibility to publish the completed Initial EIA as per the requirements of the Equality Act 2010.</i>			
<b>Departmental E&amp;D Lead Signature</b>	Gwen Kinloch	<b>Date</b>	<b>22/02/2019</b>

**SECTION 3 – ANALYSIS OF IMPACT**

Does the activity have the **potential** to:

- **positively** impact (benefit) any of the groups?
- **negatively** impact/exclude/discriminate against any group?
- **disproportionately** impact any of the groups?

Explain how this was identified – through evidence/consultation.

Any negative impacts that are identified within the analysis need to be captured within the action plan in **Section 4**

**N.B.** Marriage & Civil Partnership is only a protected characteristic in terms of work-related activities and NOT service provision

<b>Characteristic</b>	<b>Positive</b>	<b>Negative</b>	<b>Don't know</b>	<b>Reasons for positive and/or negative impact</b> Please include all the evidence you have considered as part of your analysis	<b>Action No.</b>
<b>Age</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
<b>Disability</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
<b>Gender reassignment</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
<b>Marriage &amp; Civil Partnership</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
<b>Pregnancy &amp; Maternity</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
<b>Race</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
<b>Religion or Belief</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
<b>Sex</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
<b>Sexual orientation</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
<b>Vulnerable Groups</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
<b>Deprived Communities</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
<b>Carers</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
<b>Other [please state]</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		

<p><b>Does the activity raise any issues for community cohesion?</b></p> <p><b>Does the activity contribute positively towards community cohesion?</b></p>	
<p><b>Does the activity raise any issues in relation to human rights as set out in the Human Rights Act 1998? Details of which can be found <a href="#">here</a></b></p>	
<p><b>Does the activity support / aggravate existing departmental and/or corporate risk?</b></p>	<p><i>Is the activity on the departmental risk register? If it is not, should it be?</i></p>

## CONCLUSIONS OF THE ANALYSIS

<p><b>Action following completion of the impact assessment</b></p>			
<p><i>It is important that the correct option is chosen depending on the findings of the analysis. The action plan must be completed as required.</i></p>			
<input type="checkbox"/> No major change in the activity	<input type="checkbox"/> Adjust activity	<input type="checkbox"/> Continue with activity	<input type="checkbox"/> Stop and reconsider activity
<p><b>Please explain how you have reached your conclusion</b></p>			
<p></p>			

**SECTION 4****ACTION PLAN**

Action No.	What is the negative / adverse impact identified?	Actions required to reduce / mitigate / eliminate the negative impact	Resources required	Responsible officer(s)	Target completion date

**MONITORING AND REVIEW**

The responsibility for establishing and maintaining the monitoring arrangements of the EIA action plan lies with the service completing the EIA. These arrangements should be built into the performance management framework.

Monitoring arrangements for the completion of EIAs will be undertaken by the Corporate Equality & Diversity Group and the oversight of the action plans will be undertaken by the Management Accountability Framework.

If applicable, where will the EIA Action Plan be monitored?	<i>e.g. via Service Management Team; Service Leadership Team; Programme Area Meetings</i>
How often will the EIA Action Plan be reviewed?	<i>e.g. quarterly as part of the MAF process</i>
When will the EIA be reviewed?	<i>It should be reviewed at least every 3 years to meet legislative requirements</i>
Who is responsible for carrying out this review?	

<b>Author Signature</b>		<b>Date</b>	Click here to enter a date.
<b>Head of Service/Director Signature</b>		<b>Date</b>	Click here to enter a date.
<i>The above signatures signify acceptance of the ownership of the full EIA, the responsibility for the associated Action Plan (if applicable) and the responsibility to publish the completed full EIA as per the requirements of the Equality Act 2010.</i>			
<b>Departmental E&amp;D Lead Signature</b>		<b>Date</b>	Click here to enter a date.