

Equality Analysis (EA)

Section 1 – General Information (Aims and Objectives)

Name of the proposal including aims, objectives and purpose:

This Equalities Analysis examines the administration of Discretionary Housing Payments (DHP's) to residents.

DHP's have been in existence since 2001, they replaced the previous Discretionary Payments scheme.

The DHP fund is cash limited. Local Authorities are provided with a fixed allocation each year from the Government to help people who qualify for Housing Benefit, but are having trouble paying their rent. When the money for the year runs out, no more payments can be made.

DHP's may be paid weekly, or as a lump sum and they can also be backdated.

DHP's have always been administered within the Benefits Service due to the fact that underlying eligibility is based on entitlement to Housing Benefit. Consequently staff involved in the administration are experienced in working to a fixed DHP budget and have thus ensured, in previous years that expenditure accords with the amount of available funding.

The DHP administrative framework is outlined below.

In order to qualify for DHP, the claimant must first have entitlement to Housing Benefit.

The claimant must then complete a DHP application in writing.

The DHP policy aims to ensure that all claims are considered individually, based on:

- representations made within the DHP claim
- household circumstances
- financial circumstances (income and essential expenditure)
- exceptional need
- hardship
- Availability of funds at the time of the application
- availability of any other form of discretionary funding
- period of award and sustainability – short term, long term, whether there is a future event likely to negate or reduce the need for an on-going DHP e.g. job offer, moving to alternative accommodation, reaching Pensionable age etc. (Particular emphases will be placed on the period for which we are likely to be able to sustain an award and what is likely to happen when DHP is withdrawn.

Deciding the Amount of an Award.

Having used the criteria set out above to determine that a DHP award would be appropriate, the next step is to decide:

- The weekly amount
- The award period

In reaching a decision, consideration will be given to any relevant factors including but not exclusively those set out in the main policy document. These can be summarised as:

- Availability of DHP funding (DHP budget)
- Financial circumstances (having regard to both available income and essential/necessary expenditure)
- Sustainability
- Any particular needs of the applicant, the applicant's family and any other person in the household

Notifying the outcome of a DHP application

After the DHP claim has been considered. A notification of the outcome will be provided in writing to the DHP applicant.

In all cases the notification must include:

- The date of application
- The date of the decision
- The reasons for the decision
- The applicants rights of appeal and details of how to appeal

In addition, if the DHP is awarded the written notification must also include:

- The amount awarded
- The period covered by the award
- Advice regarding the applicant's options when the award expires

Appeals

The first stage of the appeals process for DHP's is for the appeal to be reconsidered by a different Appeals Officer from the one who made the original decision.

The claimant will be notified in writing of the outcome of their appeal.

The second stage of the appeals process is for consideration by the Service Head for Customer Access. Second stage appeals will be prepared by the Appeals Team and submitted to the Service Head for Customer Access.

The written submission will:

- Explain the reasons for the decision
- highlight the grounds for appeal
- include all relevant documentation

The Service Head for Customer Access will decide the appeal and inform the Appeals Team of the decision.

The Appeals Team will then, notify the appellant of the outcome.

Service area:

Resources: Customer Access

Team name:

Benefits Services

Service Manager:

Steve Hill Head of Benefits Services

Name and role of the officer(s) completing the EA:

Lee Fearon Benefits Service Policy Manager

Section 2 – Evidence (Consideration of Data and Information)

What initial evidence do we have which may help us think about the impacts or likely impacts on service users or staff?

The speed, scope and complexity of welfare reform brings with it challenges. However, we can draw on several sources of evidence in order to help consider impacts.

- Equality analysis on the impact of the reforms themselves
- Analysis of financial loss as a result of 2013/14 welfare reforms
- Available monitoring data for Discretionary Housing Payments

Equality analysis on the impact of the reforms themselves

Additional DHP funding provided from April 2013 is designed to mitigate the unequal impact of welfare reform. It is therefore prudent to understand what, in equalities terms, this impact may be.

The Department for Work and Pensions, who are responsible both for welfare reform and the allocation of DHP, has undertaken equality analysis for the various measures introduced under the Welfare Reform Act 2012. This includes the benefit cap, social sector under occupation ('bedroom tax'), Disability Living Allowance reform and Social Fund Localisation, and is available as a series of publications¹.

In line with our own analysis the groups identified as being most affected by the reforms – in particular the benefits cap (due to come into force between July and September 2013) which will have the most significant impact on Tower Hamlets residents, will be:

- single female parents
- those aged 25 to 44 as they are more likely to have young children; and
- BME residents

¹ The Department for Work and Pensions *Welfare Reform Act 2012: equality impact assessments*
<https://www.gov.uk/government/organisations/department-for-work-pensions/series/welfare-reform-act-2012-equality-impact-assessments> Accessed 13/05/2013

Analysis of financial loss as a result of 2013/14 welfare reforms

The 2013/14 welfare reforms will have a significant impact on our residents.

The reforms and estimated reductions in Benefits entitlement are summarised below;

LHA Caps (including the extension of the Shared Accommodation Rate)

Estimated annual loss due to LHA caps is £ 3,200,000

Social Sector Under Occupation Charge - Bedroom Tax

Estimated annual loss due to the bedroom tax £3,500,000

Benefit Cap

Estimated loss due to Benefit Cap (from Sept) £4,000,000

The introduction of the Benefit Cap has been delayed. It was originally planned for April 2013 but will now be introduced by the end of September 2013. The delay and the fact that the number of families DWP expect to be affected by the cap constantly fluctuate, makes it difficult to estimate the annual reduction amount of Housing Benefit that will be incurred. Our original annual estimate based on the April introduction was £8 million. Therefore predicated on the assumption that introduction will be delayed until the end of September (a delay of 6 months), the revised annual estimate for 2013/2014, is £4m.

Estimates show the Benefit Cap average shortfall among those claims affected has been calculated at over £100 per week.

Estimates show the Social Sector Under Occupation Charge (otherwise known as the bedroom tax) will impact Social Housing tenants by £17 per week on average.

Available monitoring data for Discretionary Housing Payments

The Discretionary Housing Payment scheme has since its introduction been an enabler to provide financial assistance to the most vulnerable tenants.

The Housing Benefits Service holds data on all applicants and this continues to be subject to analysis and informs the level of support that can be provided to residents throughout the year.

Disability

DHP Awards – DHP applications from disabled claimants - current year 2013/14

Disabled claimants have made applications for 147 DHP periods in 2013/14.

This represents 17% of all DHP applications received this year, up to 24th May 2013.

The total DHP periods for which an award has been granted in respect of disabled claimants is 131 and the total DHP periods for which an award was unsuccessful in respect of disabled claimants is 12. There are 4 applications still awaiting determination.

This shows 89% of all applications for DHP's from disabled claimants have been awarded this year.

Only 8% have been unsuccessful and 3% are awaiting determination.

Ethnicity

The following data captures the ethnicity of DHP applicants in 2012/13 and those made in the current year to date 2013/14.

The analysis that follows is reported by DHP period (and not by DHP claim) in accordance with data requirements for the Department of Work and Pensions.

It should be noted that a large number of claims have either not supplied equalities data requested on their applications for DHP's or have asked that the information is not specified within their application.

2012/13

DHP Applications by ethnicity 2012/13

<u>Ethnicity</u>	Number of DHP periods	
Asian Bangladesh	459	24.76%
Black African	48	2.59%
Black Caribbean	63	3.40%
Black Somali	54	2.91%
White British	232	12.51%
Not known /unreported	734	39.59%
Other reported	264	14.24%
TOTAL DHP PERIODS	1854	100.00%

While the proportion of applicants whose ethnicity is not known or unknown is high, the analysis demonstrates that DHP applications are being made from all ethnicity backgrounds, which is encouraging in terms of take up.

2013/14

DHP Applications by ethnicity 2013/14

<u>Ethnicity</u>	Number of DHP periods	
Asian Bangladesh	192	21.97%
Black African	21	2.40%
Black Caribbean	18	2.06%
Black Somali	21	2.40%
White British	101	11.56%
Not known /unreported	314	35.93%
Other reported	207	23.68%
TOTAL DHP PERIODS	874	100.00%

Again for the current year, while the proportion of applicants whose ethnicity is not known or unknown is high, nevertheless the analysis demonstrates that DHP applications are being made from all ethnicity backgrounds.

The volumes of DHP applications has increased significantly by almost 50% per month (data for 2013/14 is provided from 1st April to 24th May 2013 – not quite two months). It should be noted that this increase has occurred before the introduction of the Benefits Cap.

DHP Awards and refusals 2012/13 and 2013/14

DHP Awards 2012/13

The total DHP periods for which an award was granted during 2012/13 is 1,341. This equates to 72% of all applications being successful. Further work is being undertaken to analyse these applications and the 513 or 23% that were not successful against equalities strands.

The total DHP periods for which an award has been granted for 2013/14 up to 24th May 2013 is 658. This equates to 75% of all applications being successful.

The total DHP periods for which an award was refused for 2013/14 up to 24th May 2013 is 208. This equates to 24% of all applications being unsuccessful.

A further 8 periods have been registered but are awaiting determination for 2013/14 (1%).

This analysis demonstrates that the successful/unsuccessful ratio remains similar despite the increase in DHP applications made in 2013/14 (72% last year, 75% for this year to date), equally the ratio for unsuccessful claims also remains similar (23% last year, 24% for this year to date).

Section 3 – Assessing the Impacts on the 9 Groups

How will what you're proposal impact upon the nine Protected Characteristics?

Discretionary Housing Payments provide claimants with further financial assistance, in addition to any welfare benefits, when the Council considers that help with housing costs is required.

DHPs can make an important contribution in preventing hardship by managing the transition for various customers or providing support where no other help is available.

DHPs are considered on a basis of need. The financial loss in Tower Hamlets could be as much as £14m per annum as a direct consequence of the reforms with further losses incurred through depressed wages and increasing costs, including rent costs.

The total available DHP funding of £2.2m falls significantly short of this loss and the financial need and vulnerability of Tower Hamlets residents.

DHPs will therefore

- be targeted to the most vulnerable households

- be limited to covering the essential costs of living
- assist in the transition over a limited period e.g. DHP's will not be used to support longer term shortfalls in rent – support may be offered to assist in finding employment and/or finding alternative accommodation etc.

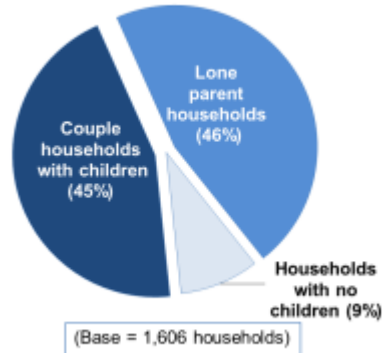
DHPs should not be considered as a long term solution to the effects of the welfare reforms and can only be used to temporarily mitigate the financial impact for a limited period pending an alternative permanent solution.

It is likely, given our understanding of the way in which BME families and lone parents are particularly impacted by welfare reform changes, that these groups will be particularly dependent on DHPs and the policy has been drafted with an understanding of this in order to mitigate the impact of welfare changes on these already disadvantaged groups. Further analysis is given below.

Target Groups	Impact – Positive or Adverse What impact will the proposal have on specific groups of service users or staff?	Reason(s) <ul style="list-style-type: none"> • Please add a narrative to justify your claims around impacts and, • Please describe the analysis and interpretation of evidence to support your conclusion as this will inform decision making <p>Please also how the proposal will promote the three One Tower Hamlets objectives?</p> <ul style="list-style-type: none"> -Reducing inequalities -Ensuring strong community cohesion -Strengthening community leadership 																											
Race		<p>DHP's are more likely to be made to this group as BME residents are disproportionately impacted as a percentage of the overall Tower Hamlets population by the reforms.</p> <p>Breakdown of previous DHP applications by ethnicity:</p> <p><u>DHP Applications by ethnicity 2012/13</u></p> <table border="1" data-bbox="571 774 1444 1268"> <thead> <tr> <th><u>Ethnicity</u></th> <th colspan="2">Number of DHP periods</th> </tr> </thead> <tbody> <tr> <td>Asian Bangladesh</td> <td>459</td> <td>24.76%</td> </tr> <tr> <td>Black African</td> <td>48</td> <td>2.59%</td> </tr> <tr> <td>Black Caribbean</td> <td>63</td> <td>3.40%</td> </tr> <tr> <td>Black Somali</td> <td>54</td> <td>2.91%</td> </tr> <tr> <td>White British</td> <td>232</td> <td>12.51%</td> </tr> <tr> <td>Not known /unreported</td> <td>734</td> <td>39.59%</td> </tr> <tr> <td>Other reported</td> <td>264</td> <td>14.24%</td> </tr> <tr> <td>TOTAL DHP PERIODS</td> <td>1854</td> <td>100.00%</td> </tr> </tbody> </table>	<u>Ethnicity</u>	Number of DHP periods		Asian Bangladesh	459	24.76%	Black African	48	2.59%	Black Caribbean	63	3.40%	Black Somali	54	2.91%	White British	232	12.51%	Not known /unreported	734	39.59%	Other reported	264	14.24%	TOTAL DHP PERIODS	1854	100.00%
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Disability		<p>DHPs will be used to assist disabled groups based on level of need. Even where disabled residents may be exempt from the reforms, those with a disability may be indirectly affected. The DWP expects approximately half of those households affected by the cap will contain somebody who is classed as disabled under the Equality Act², so, it is important that the discretionary support provided reflects this.</p> <p>Disabled claimants have made applications for 147 DHP periods in 2013/14. This represents 17% of all DHP applications received this year, up to 24th May 2013. The total DHP periods for which an award has been granted in respect of disabled claimants is 131. The total DHP periods for which an award was unsuccessful in respect of disabled claimants is 12. There are 4 applications still awaiting determination.</p> <p>This shows 89% of all applications for DHP's from disabled claimants have been awarded this year. Only 8% have been refused and 3% are awaiting determination.</p>
Gender		<p>We do not envisage differential impact of the change in policy by gender, though lone parents are particularly affected by the benefit and cap and thus in need of these payments. Data in respect of lone parents indicates:</p> <p>Lone Parents have made applications for 148 DHP periods in 2013/14. This represents 17% of all DHP applications received this year, up to 24th May 2013. The total DHP periods for which an award has been granted in respect of lone parents is 115. The total DHP periods for which an award was unsuccessful in respect of lone parents is 33.</p> <p>This shows 78% of all applications for DHP's from lone parents have been awarded this year.</p> <p>Additionally, lone parent households make up 10.6%, which is the same as the national figure and below that for London where lone parent households account for 12.7% of all households (Source: Tower Hamlets Census Second Release Headline Analysis).</p> <p>However, lone parent households make up 46% of all those affected by the benefits cap (source: Benefit Cap Analysis final report 26 11 12 – based on DWP September scan data – illustrated below). This implies that the number of lone parents who will claim DHP is likely to rise significantly once the cap comes in</p>

Figure 1 Benefit Cap households by type of household, Tower Hamlets



Source: DWP Benefit Cap scan (September 2012) for Tower Hamlets

		<p>Figure 1 Benefit Cap households by type of household, Tower Hamlets</p> <p>(Base = 1,606 households)</p> <p>Source: DWP Benefit Cap scan (September 2012) for Tower Hamlets</p>
Gender Reassignment		We do not envisage differential impact of the change in policy in relation to gender reassignment.
Sexual Orientation		We do not envisage differential impact of the change in policy in relation to gender reassignment.
Religion or Belief		We do not envisage differential impact of the change in policy in relation to religion or belief, except in so far as these interact with ethnicity which is covered above.
Age		<p>The Government's welfare reforms will affect working age residents (including their children) disproportionately because the majority of the reforms do not affect those of pension age.</p> <p>The Council estimates that over 5,000 children will be impacted by the benefits cap alone. This is part because due to the means tested nature of welfare provision, larger families will disproportionately affected. Parents whose children who are most in need of support, such as those who have specialist needs disabled, or sitting exams, are more likely to be awarded a DHP.</p> <p>Consequently our DHP policy framework highlights the following groups as higher need:</p> <ul style="list-style-type: none"> • where the applicant has children who are due to undertake GCSE's or A levels • where there are disabled children or non-dependants in the household • where the family is vulnerable – do they access the Council's Children or Adult Services • if the child is sitting exams in the near future

Marriage and Civil Partnerships.		We do not envisage differential impact of the change in policy in relation to marriage and civil partnership.
Pregnancy and Maternity		Pregnancy and maternity is a factor that would be taken into account in assessing the vulnerability of a claimant in regard to their need for DHPs
Other Socio-economic Carers		DHPs are particularly likely to be sought by those in poorer socio-economic groups due to their reliance on welfare benefits. The criteria are intended to support those most vulnerable within these groups. Caring responsibilities are another factor which is taken into account in assessing the vulnerability of the claimant.

Section 4 – Mitigating Impacts and Alternative Options

From the analysis and interpretation of evidence in section 2 and 3 - Is there any evidence of or view that suggests that different equality or other protected groups (inc' staff) could have a disproportionately high/low take up of the new proposal?

Yes? No?

(Please note – a key part of the EA process is to show that we have made reasonable and informed attempts to mitigate any negative impacts. AN EA is a service improvement tool and as such you may wish to consider a number of alternative options or mitigation in terms of the proposal.)

All DHPs are considered on the merits of each individual case. Claims are considered individually, based on:

- representations made within the DHP claim
- household circumstances
- financial circumstances (income and essential expenditure)
- exceptional need
- hardship
- Availability of funds at the time of the application
- availability of any other form of discretionary funding
- period of award and sustainability – short term, long term, whether there is a future event likely to negate or reduce the need for an on-going DHP e.g. job offer, moving to alternative accommodation, reaching Pensionable age etc. (Particular emphases will be placed on the period for which we are likely to be able to sustain an award and what is likely to happen when DHP is withdrawn.
- extensive experience of DHP administration by Benefits Service Appeals Officers

[DWP DHP good practice guide April 2013](#)

This document, which is written by the Department of Work & Pensions, provides clarification and guidance on the administration of DHP applications.

The Benefits Service has put into place monitoring arrangements to ensure on-going monitoring of who qualifies for DHPs and who is refused, reasons for DHP awards and equality characteristics which we will monitor including disability, gender and race. This monitoring information will be reviewed at regular intervals to ensure that the change in policy has not had a detrimental impact on any particular equality group and to enable us to understand the differential impact of benefit changes on these groups.**Alternative Options**

- The Discretionary Housing Payment fund is provided by central government and there are certain expectations about how we use it to support those with a shortfall in housing benefit. This limits the options we have available to us. Within this framework, we have sought to develop a policy which targets those most in need in line with other Council priorities.
- Inevitably, the DPH fund will not be able to support all those whose income is reduced due to benefit reform. The Council has an option to subsidise loss of Housing Benefit in all cases affected by welfare reform. This is not financially viable for the Council, however the Council has identified a further £1million in addition to the funding provided by government to support those hit by the benefit cap who are homeless in temporary accommodation.

- In addition to providing top up funding, options to enable people to move into employment or to identify alternative accommodation, including smaller accommodation in the case of the bedroom tax, are being actively pursued alongside the provision of financial support to the most vulnerable to minimise the call on the DHP fund and work with people to find their own solutions.

Section 5 – Quality Assurance and Monitoring

Have monitoring systems been put in place to check the implementation of the proposal and recommendations?

Yes? No?

How will the monitoring systems further assess the impact on the equality target groups?

The DHP scheme will be subject to on-going analysis in order to ensure that the implementation of the proposals meet their outlined aims and to monitor any differential impact on equality groups and review the policy in this light.

Does the policy/function comply with equalities legislation?
(Please consider the [OTH objectives](#) and [Public Sector Equality Duty](#) criteria)

Yes? No?

If there are gaps in information or areas for further improvement, please list them below:

This policy actively supports both OTH objectives and the Public Sector Equality Duty, in mitigating against impacts which disproportionately affect certain communities and groups.

How will the results of this Equality Analysis feed into the performance planning process?

The results of this Equality Analysis have illustrated the need to fully imbed analysis of equalities impacts within our monitoring. This is reflected in the Action Plan below.

Section 6 - Action Plan

As a result of these conclusions and recommendations what actions (if any) **will** be included in your business planning and wider review processes (team plan)? Please consider any gaps or areas needing further attention in the table below the example.

Recommendation	Key activity	Progress milestones including target dates for either completion or progress	Officer responsible	Progress
<p>Example</p> <p>1. Better collection of feedback, consultation and data sources</p> <p>2. Non-discriminatory behaviour</p>	<p>1. Create and use feedback forms. Consult other providers and experts</p> <p>2. Regular awareness at staff meetings. Train staff in specialist courses</p>	<p>1. Forms ready for January 2010 Start consultations Jan 2010</p> <p>2. Raise awareness at one staff meeting a month. At least 2 specialist courses to be run per year for staff.</p>	<p>1.NR & PB</p> <p>2. NR</p>	

Section 7 – Sign Off and Publication

Name: (signed off by)	Claire Symonds
Position:	Service Head, Customer Access & ICT
Date signed off: (approved)	21 June 2013

Section 8 Appendix – FOR OFFICE USE ONLY

This section to be completed by the One Tower Hamlets team

Policy Hyperlink :

Equality Strand	Evidence
Race	
Disability	
Gender	
Gender Reassignment	
Sexual Orientation	
Religion or Belief	
Age	
Marriage and Civil Partnerships.	
Pregnancy and Maternity	
Other Socio-economic Carers	

Link to original EQIA	Link to original EQIA
EQIAID (Team/Service/Year)	

Section 9 Report appendices

Appendix I) Reporting Measures

Based on DWP Circular A11/2013, which sets out new measures introduced to monitor awards. Under these new provisions Local Authorities are expected to record DHP awards under the following categories:

- The Benefit Cap
- Removal of the spare room subsidy in social rented sector
- LHA reforms - including extension of the Shared Accommodation Rate
- A combination of reforms
- No impact - where an award is made to a recipient who is not affected by the reforms but is considered to be vulnerable

These categories are further broken down by the DWP into six separate classifications which set out the reasons for the award.

The classifications are:

- to help secure and move to alternative accommodation (e.g. a rent deposit)
- to help with short-term rental costs until the claimant is able to secure and move to alternative accommodation
- to help with short-term rental costs while the claimant seeks employment
- to help with on-going rental costs for disabled person in adapted accommodation
- to help with on-going rental costs for foster carer
 - to help with short term rental costs for any other reason.

In order to report these new award categories and classifications, the following codes have been set up for each of the five categories above and should be used when making awards.

1. If you award a DHP due to the benefit cap, you need to select one of the following new reason codes

BCAP_A – To help secure and move to alternative accommodation.
(e.g., rent deposit).

BCAP_B - To help with short term rental costs until claimant secures alternative accommodation

BCAP_C - To help with short term rental costs while the claimant seeks employment

BCAP_D - To help with on-going rental costs for disabled person in adapted accommodation

BCAP_E - To help with on-going rental costs for foster carer

BCAP_F - To help with short term rental costs for any other reason

2. If you award a DHP due to the claimant suffering hardship because they are affected by the bedroom tax, you need to select one of the following new reason codes –

SSSC_A – To help secure and move to alternative accommodation (e.g. rent deposit)

SSSC_B - To help with short term rental costs until claimant secures alternative accommodation
SSSC_C - To help with short term rental costs while the claimant seeks employment
SSSC_D - To help with on-going rental costs for disabled person in adapted accommodation
SSSC_E - To help with on-going rental costs for foster carer
SSSC_F - To help with short term rental costs for any other reason

3. If you award a DHP due to the LHA reforms (U35), you need to select one of the following new reason codes –

LHA_A – To help secure and move to alternative accommodation (e.g. rent deposit)
LHA_B - To help with short term rental costs until claimant secures alternative accommodation
LHA_C - To help with short term rental costs while the claimant seeks employment
LHA_D - To help with on-going rental costs for disabled person in adapted accommodation
LHA_E - To help with on-going rental costs for foster carer
LHA_F - To help with short term rental costs for any other reason

4. If you award a DHP due to a combination of these reforms, you need to select one of the following new reason codes –

CREF_A – To help secure and move to alternative accommodation (e.g. rent deposit)
CREF_B - To help with short term rental costs until claimant secures alternative accommodation
CREF_C - To help with short term rental costs while the claimant seeks employment
CREF_D - To help with on-going rental costs for disabled person in adapted accommodation
CREF_E - To help with on-going rental costs for foster carer
CREF_F - To help with short term rental costs for any other reason

5. No impact - where an award is made to a recipient who is not affected by the reforms but is considered to be vulnerable

The existing codes used prior to 2013/14 will remain on system and can be used where an award is made to residents who are not affected by the welfare reforms (i.e. the “no impact” cases).

As LBTH does not currently award one-off DHP payments, the code “A” reasons will not need to be used unless there is a change in policy.

The introduction of the new codes will not only enable us to comply with DWP reporting requirements but also allows us to report broadly on expenditure in respect of each of the four criteria used by DWP to apportion funding. This may also be helpful in that not only will the DHP payments be transparent but if it is decided that in future we should redesign our local DHP policy to attempt to replicate the national funding arrangements then this should be easily achieved.

Equality Analysis (EA)

Section 1 – General Information (Aims and Objectives)

Name of the proposal including aims, objectives and purpose:

(Please note – for the purpose of this doc, ‘proposal’ refers to a policy, function, strategy or project)

This Equalities Analysis examines the administration of the Crisis and Support Grants to residents, many of whom will be directly affected by welfare reform changes.

From April 2013, the council has been responsible for providing financial support to some of the most vulnerable residents of Tower Hamlets. The Mayor’s Crisis & Support Grants replace Community Care Grants and Crisis Loans, which used to be provided by Job Centres and the Department for Work & Pensions.

Funds for the Grants are very limited, and there are strict eligibility criteria to ensure we can support people in the greatest need. To apply, residents must be 16 or over, and must not be subject to any UK immigration control. Unless residents are applying through a council social worker or one of our partner agencies, they must live in Tower Hamlets and in a household that receives Housing Benefit and must not be subject to any DWP welfare sanctions.

Crisis Grants are designed to help people who have experienced a sudden crisis or who are at risk of one. They can help in the short term with living costs, such as food, heating and accommodation, or to support a resident that is a victim of crime or suffer another misfortune.

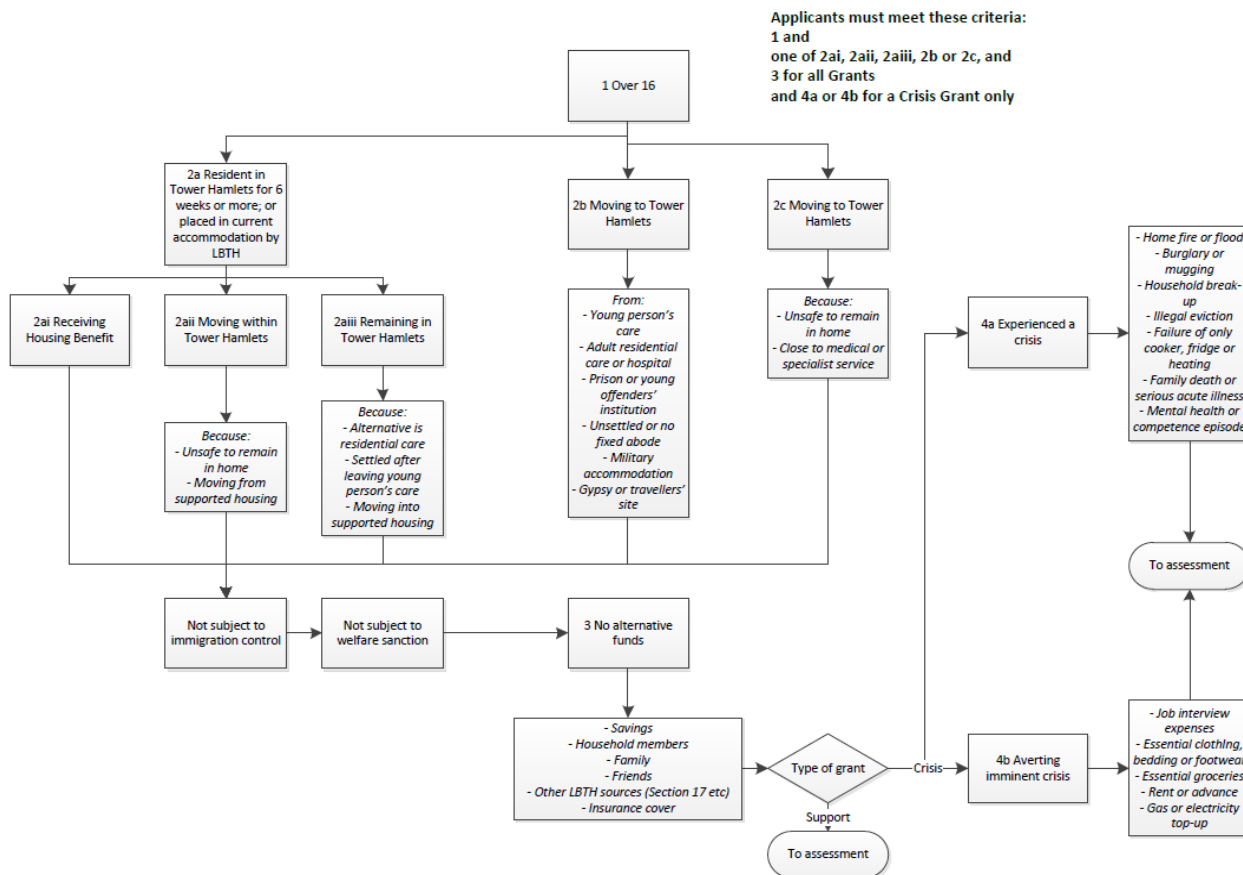
Support Grants provide help for the longer term, enabling people to live independently and safely in the community. They can be used to support care leavers, vulnerable residents moving to or from supported housing or if it is unsafe for a resident to remain in their current home.

The information below shows the types of application received during April 2013, the scheme’s first month of operation, the percentage of applications approved and the average grant amount.

Event	Applications				£ paid	
	Received	Approved	Refused	% approved	Total	Average
Daily living expenses	263	151	112	57.4	9,030	60
Essential journey	5	3	2	60.0	150	50
Moving home	39	23	16	59.0	3,585	156
New clothing	33	21	12	63.6	1,385	66
Replaced damaged items	147	56	91	38.1	11,750	210
Setting up home	50	23	27	46.0	24,905	1,083
Victim of crime	3	3	0	100.0	215	72
Other emergency	86	43	43	50.0	6,615	154
Total	626	323	303	51.6	57,635	178

Within this month Tower Hamlets received 626 applications for the Mayor’s Crisis & Support Grant. 51.6% of applications were approved and an average of £178 (total £57,635) was paid through the scheme.

The administrative framework for the Mayor's Crisis & Support Grant was set out in a paper presented to MAB in September 2012. The assessment criteria for the Grants have been agreed and are outlined below.



Service area:

Resources: Customer Access & ICT

Team name:

Customer Access & Revenues

Service manager:

Keith Paulin, Head of Customer Services

Name and role of the officer(s) completing the EA:

Wesley Hedger, Senior Strategy, Policy and Performance Officer

Section 2 – Evidence (Consideration of Data and Information)

What initial evidence do we have which may help us think about the impacts or likely impacts on service users or staff?

The Department for Work and Pensions (DWP), who previously delivered the scheme, completed an Equalities Impact Assessment in October 2011. This EA analysed data collected by the department in 2009/10 for both Community Care Grants and Crisis Loans nationally. The DWP was unable to collect data on Sexual orientation, Religion or belief, Marriage and Civil Partnership or Pregnancy and maternity. The Equality Impact Assessment provided the following national picture;

Gender

The EA suggested that 58% of final decisions for Crisis Loans were made in respect to single males, 34% made in respect to single females and 8% made in respect to couples. The success rates were the same for single males and females (76%) and 74% for a couple. 49% of Community Care Grant final decisions made in respect to single females, 36% made in respect to single males and 15% made in respect to couples. The success rates for single females were higher (49%) than singlemales (42%) but lower than couples (53%).

Age

In 2009/10 a small proportion of Crisis Loans final decisions were made in respect of customers under 18 (3%) and over 45 (13%). The largest proportions (37%) of final decisions, nationally, were made in respect of customers between 18 to 24 years old. Customers 65 and over also have lower success rates. The DWP suggest that younger people were advantaged by the previous system and older people are disadvantaged, although it was not clear why this would be. However, success rates in Community Care Grants are higher for those customers aged 45 and over. Older people are currently advantaged by the system in respect of higher success rates and this may improve through a locally-delivered service.

Disability

In 2009/2010 31% of Crisis Loan final decisions were made in respect of disabled people and this represents an increase of 11 percentage points on the previous year. Overall success rates are very similar for disabled customers (76%) compared to non disabled customers (77%). With Community Care Grants the overall success rates were higher for disabled customers (48%) than for non-disabled customers (43%). Disabled customers are currently well served by the Community Care Grant system and there is no evidence to suggest that this will change in a locally-delivered system.

Ethnicity

79% of Crisis Loan final decisions are made in respect of white customers with some ethnic groups receiving less than 1% of the final decisions and this remains consistent with previous years. Nationally, the overall success rates are slightly higher for white customers than other groups. The DWP report suggests that “a locally-delivered system would be able to identify the most vulnerable people in their area and intervene based on a risk to health and safety which could address this issue”. The success rates for Community Care Grants were slightly higher for all ethnic minority customers (average of 46%) than white customers (average of 44%)

Equality analysis on the impact of the reforms themselves

The DWP has provided limited performance information at a borough level. Data provided by the DWP illustrates the profile of Tower Hamlets claimants in 2009/10 and 2010/11;

- In 2009/10 and 2010/11, there were approximately 13,050 applications per year for Community Care Grants and Crisis Loans. 61% of all applications resulted in awards and total expenditure was £1.74m per year.

- 70% of all applications were for Crisis Loans (over 9000 applications). The average award for a Crisis Loan was £54.50
- Although making up 30% of applications Community Care Grants make up over 70% of the total Social Fund budget (£1.24 million) allocated in Tower hamlets. The average award was for £316.
- 55.5% of the people who were awarded Crisis Loans were aged 18 - 34. 58% of loans awarded were to single male households. High proportions of households who were awarded Crisis Loans had no children under 16 (82%). This possibly reflects the fact that there are limited other sources of support available to single, childless people.
- 40.5% of people awarded Community Care Grants were aged 18 - 34. 66.5% of recipients of Community Care Grants were to single women households (52.5%) or couple (14%) households. 69.5% had no children under 16.
- Approximately 21% of funding awarded for living expenses in 2011/12 was for fourth or subsequent awards. The limiting of awards to 3 per rolling 12 month period is therefore would reduce expenditure. It is likely that these individuals / households receiving 4+ payments per year are the most vulnerable / people with chaotic lives, highly likely to be known to adults and/or children's social care and there may therefore be knock on implications for Council support and related services to these households.

The limited analysis provided by the DWP indicates that in Tower Hamlets many of the claimants are single individuals without children. This is possibly because people who are single, and particularly those under 25, have limited access to other types of welfare support. In contrast, Community Care Grants in Tower Hamlets have been more commonly sought by families with young children and by lone parents in receipt of Income Support. Single applicants over 50 suffering from health problems are the second largest group claiming Community Care Grants. Grants are often sought for vulnerable people that are in need of furniture/ appliances when secure accommodation is offered after a period of temporary or unsettled period of life or time in prison; families facing exceptional pressures and who have no money for replacement of white goods & furniture, and also to enable visits to a relative who is ill in hospital some distance away.

The local provision of the Mayor's Crisis & Support Grants has been administered by the local authority since April 2013. Unfortunately, due to the demands of establishing the Mayor's Crisis & Support Grants, equalities data is not currently being captured. There is a commitment to establish the appropriate mechanisms to collect the relevant data by September and it is suggested that a more complete Equality Assessment is completed once this data is available.

Based on the volume of applications in 2011/12, it has been projected that demand would be close to 9,000 within the current financial year, nearly two-thirds of which would be for Crisis Loans. It is also suggested that the average payment would be close to £54. Current management information data would suggest that we are broadly in line with this projection. However, data is only available for April 2013 and it is not possible to forecast using the limited level of data. We do not know if this was a typical month or how demand has/will change over time. We are, therefore, unable to confidently determine if the transition to the Mayor's Crisis and Support Grants has had a detrimental impact.

Section 3 – Assessing the Impacts on the 9 Groups

How will the scheme impact upon the nine Protected Characteristics?

Target Groups	Impact – Positive or Adverse What impact will the proposal have on specific groups of service users or staff?	Reason(s) <ul style="list-style-type: none"> • Please add a narrative to justify your claims around impacts and, • Please describe the analysis and interpretation of evidence to support your conclusion as this will inform decision making <p>Please also how the proposal will promote the three One Tower Hamlets objectives?</p> <ul style="list-style-type: none"> -Reducing inequalities -Ensuring strong community cohesion -Strengthening community leadership
Race	Unknown	DHP's are more likely to be made to this group as BME residents are disproportionately impacted as a percentage of the overall Tower Hamlets population by the reforms. As outlined above, equalities data is not available as the responsibility for Crisis and Support Grants transferred from the DWP to Local Authorities in April 201. The DWP have not provided a breakdown of previous demands on this service by Target Groups.
Disability	Unknown	DHP's are more likely to be made to this group as disabled residents and their carers are disproportionately impacted as a percentage of the overall Tower Hamlets population by the reforms. As outlined above, equalities data is not available as the responsibility for Crisis and Support Grants transferred from the DWP to Local Authorities in April 201. The DWP have not provided a breakdown of previous demands on this service by Target Groups.
Gender	Unknown	Women are disproportionately affected by the reforms and the economic downturn. For example lone parent households make up 46% of all those affected by the benefits cap (source: Benefit Cap Analysis final report 26 11 12 – based on DWP September scan data – illustrated below). This implies that the number of lone parents who will claim Crisis and Support Grants is likely to rise significantly once the cap comes in

		<p>Figure 1 Benefit Cap households by type of household, Tower Hamlets</p> <p>(Base = 1,606 households)</p> <p>Source: DWP Benefit Cap scan (September 2012) for Tower Hamlets</p>
Gender Reassignment	Unknown	We do not envisage differential impact of the change in policy in relation to gender reassignment.
Sexual Orientation	Unknown	We do not envisage differential impact of the change in policy in relation to sexual orientation.
Religion or Belief	Unknown	We do not envisage differential impact of the change in policy in relation to age.
Age	Unknown	<p>The Government's welfare reforms will affect working age residents (including their children) disproportionately because the majority of the reforms do not affect those of pension age.</p> <p>The Council estimates that over 5,000 children will be impacted by the benefits cap alone. This is part because due to the means tested nature of welfare provision, larger families will disproportionately affected. Parents whose children who are most in need of support, such as those who have specialist needs, are more likely to seek help and therefore receive Crisis and Support Grants.</p>
Marriage and Civil Partnerships.	Unknown	We do not envisage differential impact of the change in policy in relation to marriage and civil partnership.
Pregnancy and Maternity	Unknown	Pregnancy and maternity is a factor that would be taken into account in assessing the vulnerability of a claimant in regard to their need for Crisis and Support Grants

Other Socio-economic Carers	Unknown	Crisis and Support Grants are particularly likely to be sought by those in poorer socio-economic groups due to their reliance on welfare benefits. The criteria are intended to support those most vulnerable within these groups. Caring responsibilities are another factor which is taken into account in assessing the vulnerability of the claimant.
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Section 4 – Mitigating Impacts and Alternative Options

From the analysis and interpretation of evidence in section 2 and 3 - Is there any evidence of or view that suggests that different equality or other protected groups (inc' staff) could have a disproportionately high/low take up of the new proposal?

Yes? No?

If yes, please detail below how evidence influenced and formed the proposal? For example, why parts of the proposals were added/removed?

(Please note – a key part of the EA process is to show that we have made reasonable and informed attempts to mitigate any negative impacts. AN EA is a service improvement tool and as such you may wish to consider a number of alternative options or mitigation in terms of the proposal.)

The Discretionary Social Fund has been a core part of the welfare system for over 25 years. It was designed to meet the needs of the most vulnerable and people experiencing hardship and emergencies and is made up of regulated and discretionary schemes. It was the place of last resort within the previous social security system. In moving the administration of the scheme to local authorities the Government argued that the decision to make an award is usually in relation to very specific needs and requires a high level of discretion. This administration of this service is one of many operational challenges that the welfare reform programme has placed at the Council's door.

In developing the scheme Members made a number of decisions that provided the framework in which the scheme would work (MAB OCT 2012), these included that 1. That the conditions of accessing the Fund will include: An simple application process that will include strict eligibility criteria for local residents that will also restrict awards to a maximum of three awards in any one year and that scheme will run a Phone / online application. These were in line with how the DWP had run the scheme.

As this is the first year of the scheme's operation work in ongoing to ensure that all appropriate management information as well as equalities data is collected. The purpose of this is that all can reviewed at the end of the year in order that we can gain a greater understanding of who is benefiting from the fund and if there is any need to amend eligibility criteria.

Section 5 – Quality Assurance and Monitoring

Have monitoring systems been put in place to check the implementation of the proposal and recommendations?

Yes? No?

How will the monitoring systems further assess the impact on the equality target groups?

The local provision of then Mayor's Crisis & Support Grants has been administered by the local authority since April 2013. Unfortunately, due to the demands of establishing the Mayor's Crisis & Support Grants, equalities data has not captured. There is a commitment to establish the appropriate mechanisms to collect the relevant data by August and it is suggested that a more complete Equality Assessment is completed once this data is available.

Does the policy/function comply with equalities legislation?
(Please consider the [OTH objectives](#) and [Public Sector Equality Duty](#) criteria)

Yes? No?

If there are gaps in information or areas for further improvement, please list them below:

This policy actively supports both OTH objectives and the Public Sector Equality Duty, in mitigating against impacts which disproportionately affect certain communities and groups.

How will the results of this Equality Analysis feed into the performance planning process?

The results of this Equality Analysis have illustrated the need to fully imbed analysis of equalities impacts within our monitoring. This is reflected in the Action Plan below.

Section 6 - Action Plan

As a result of these conclusions and recommendations what actions (if any) **will** be included in your business planning and wider review processes (team plan)? Please consider any gaps or areas needing further attention in the table below the example.

Recommendation	Key activity	Progress milestones including target dates for either completion or progress	Officer responsible	Progress
<p>Incorporate equalities data into the Mayor's Crisis & Support Grants performance management system</p>	<p>Include equalities questionnaire as part of the Mayor's Crisis and Support Grant application process by adding to on line form and at end of Contract Centre call via customer satisfaction survey</p> <p>Support practitioners, where applicable, to assist residents in completing the equalities questionnaire.</p> <p>Incorporate equalities data into the monthly performance management report.</p>	<p>Forms ready by the end of July for roll out in September 2013 – where possible include the nine Protected Characteristics</p> <p>Work with stakeholders such as support groups and the Welfare Reform Task Group</p> <p>Develop and produce a new performance monitoring report to include the nine Protected Characteristics, where applicable.</p>	<p>Customer Access</p> <p>Customer Access</p> <p>Customer Access</p>	
<p>Analysis equalities data and complete an Equalities Assessment</p>	<p>Analyse first available quarter data (July-September quarter)</p>	<p>Updated EA October 2013</p>	<p>Customer Access/Resources SPP</p>	
<p>Review assessment criteria of the Mayor's Crisis & Support Grants</p>	<p>Assess management information for first two quarters (April-September)</p>	<p>Review criteria October 2013</p>	<p>Customer Access</p>	

Section 7 – Sign Off and Publication

Name: (signed off by)	Claire Symonds
Position:	Service Head, Customer Access & ICT
Date signed off: (approved)	21 June 2013

Section 8 Appendix – FOR OFFICE USE ONLY

This section to be completed by the One Tower Hamlets team

Policy Hyperlink :

Equality Strand	Evidence
Race	
Disability	
Gender	
Gender Reassignment	
Sexual Orientation	
Religion or Belief	
Age	
Marriage and Civil Partnerships.	
Pregnancy and Maternity	
Other Socio-economic Carers	

Link to original EQIA	Link to original EQIA
EQIAID (Team/Service/Year)	

Equality Analysis (EA)

Section 1 – General Information (Aims and Objectives)

Name of the proposal including aims, objectives and purpose:

This Equalities Analysis considers the proposals for deploying discretionary support to some of those residents of homeless temporary accommodation who will be directly affected by welfare reform changes.

Further detail on the mechanisms and overall level of support can be found in the body of the report.

A separate EA will be available for Crisis & Support Grants and Discretionary Housing Payments (DHP)

The aims and objectives of this discretionary support are to:

- Reduce arrears and avoid deprivation
- Help claimants through difficult personal events
- Safeguard accommodation

The people affected by these support proposals are:

- Non-working benefit claimants living in homeless temporary accommodation
- Landlords of existing temporary accommodation
- Working households (benefit dependent or not) in homeless temporary accommodation

The primary beneficiaries though will be those non-working benefit dependent households identified by the policy as being likely most vulnerable residents experiencing significant financial difficulty, many of whom will be impacted directly by welfare reform. They will either receive DHP or the Temporary Accommodation Support Fund to cover their rent over the shorter term.

Our analysis shows that the primary recipients of discretionary payments will be:

- single female parents;
- those aged 25 to 44 as they are more likely to have young children; and
- BME residents.

The outcomes of this policy are to:

- Safeguard residents in their accommodation
- To alleviate poverty
- To avoid adverse rent collection performance

Directorate: Development and Renewal

Service: Housing Options

Service manager: Colin Cormack

Name and role of the officer(s) completing the EA: Lorraine Douglas/Colin Cormack

Section 2 – Evidence (Consideration of Data and Information)

What initial evidence do we have which may help us think about the impacts or likely impacts on service users or staff?

The speed, scope and complexity of welfare reform pale by comparison to its impact and, whilst mitigations are worthy of exploration and application, said speed, scope and complexity limits the extent to which we are able to estimate the impact of the proposed mitigations. However, we can draw on several sources of evidence in order to help consider impacts.

- Equality analysis on the impact of the reforms themselves
- Analysis of financial loss as a result of welfare reform
- Available monitoring data for Local Housing Allowance Caps

Equality analysis on the impact of the reforms themselves

The proposed discretionary support is designed to mitigate the unequal impact of welfare reform. It is therefore prudent to understand what, in equalities terms, this impact may be.

The Department for Work and Pensions, who is responsible for welfare reform, has undertaken equality analysis for the various measures introduced under the Welfare Reform Act 2012³. In line with our own analysis, the groups identified as being most affected by the reforms will be :-

- single female parents;
- those aged 25 to 44 as they are more likely to have young children; and
- BME residents.

As the impact of the welfare reform changes impacts the same groups in Tower Hamlets it follows that these are more likely to form the primary recipients of the discretionary support.

Analysis of financial loss as a result of welfare reform

The cap on housing benefits will have the most significant impact on occupiers of homeless temporary accommodation – an average of £143 per week.

Available monitoring data for Local Housing Allowance Caps and Discretionary Housing Payments

Relying on the DWP data, Housing Options estimate around 500 households (of the 1,900) in homeless temporary accommodation will be in a position where the cap will limit, in part or in full, their ability to pay their rent.

The amount being removed from the temporary accommodation benefit-funded economy is over £5M. The discretionary support proposals recognise the opportunity to draw down upwards of £1m in 2013/14 in support resources. Put plainly, the full year equivalent of assisting 1 in 5 households on average.

The primary aim of the Temporary Accommodation Fund is a net reduction in the cost of the

³ The Department for Work and Pensions *Welfare Reform Act 2012: equality impact assessments*
<https://www.gov.uk/government/organisations/departments-for-work-and-pensions/series/welfare-reform-act-2012-equality-impact-assessments> Accessed 13/05/2013

homeless temporary accommodation rent. There will be two distinct mechanisms through which this will be administered.

The first mechanism relies on exploiting the rent reduction opportunity of Non Secure Tenancies (NSTs), it being within the council's gift to do so as they are in council-owned stock. The second mechanism relies on not passing on all or part of the rent due to the occupying household. The extent of how much to pass on (or not) being dependent to each individual's circumstances.

Section 3 – Assessing the Impacts on the 9 Groups

How will what you're proposal impact upon the nine Protected Characteristics?

By adopting the mechanism of reducing rents - leading to a net loss of income - or opting not to pass on all/part of the rent due - increasing net expenditure, - the outcome of each option is a near equivalent of making a discretionary payment. This is therefore how these proposals will be described below.

As referred to above, £5M is to be removed from the homeless temporary accommodation benefit economy annually. That is not a sustainable loss and, in the absence of other opportunities, the Service would need to move all of the 500+ households to cheaper accommodation. Doing so would put into tension the political and operational desires to house homeless households within the borough. Moving affected households though does satisfy that part of the statutory obligation that such accommodation needs to be *suitable and reasonable*, affordability being an essential factor in these obligations. That said, the location of any alternative accommodation requires similar *suitable and reasonable* considerations.

The discretionary payments then will prioritise those:-

- whose children are in the critical school years of 10 & 11 and 12 & 14
- need to remain in-borough for extenuating medical or social reasons
- cannot afford to live anywhere, the cap's impact on larger families in particular refers

In considering the "1 in 5" principle, it needs to be appreciated that around 400 households in homeless temporary will not receive discretionary payments. The groups most likely not to receive assistance are estimated to be the following:

- Families of older children who are not taking exams.
- Households that lack extenuating social and/or medical imperatives
- Those already living in lower cost areas

Target Groups	Impact – Positive or Adverse	Reason(s)
Race	Positive	Discretionary support is more likely to be made to this group as BME residents are disproportionately represented in the homeless temporary accommodation population and, in addition, are likewise disproportionately impacted as a percentage of the overall Tower Hamlets population by the reforms. However, support will not be provided on the basis of race.
Disability	Positive	The DWP suggests that roughly half of the households affected by the cap will contain somebody who is classed as disabled under the Equality Act ⁴ . Conscious that disability is disproportionately higher in homeless temporary accommodation households and many of these will have specific medical needs for in-borough accommodation, this group is likely to feature highly within those persons receiving the proposed support mechanisms. However, support will not be provided solely on the basis of disability.
Gender	Positive	Appreciating that a) the majority affected are lone parents and b) most lone parents are women, it is anticipated that the majority of those to receive assistance will be women also.
Gender Reassignment	Not known	The impact of discretionary payments is not known
Sexual Orientation	Not known	The impact of discretionary payments is not known
Religion or Belief	Not known	The impact of discretionary payments is not known
Age	Positive	<p>The reforms will impact children and those of working age who are not though working and it is this group who are most likely to have school age children. It should also be appreciated that larger families i.e. those with more children will be disproportionately affected, there being no sliding cap to accommodate larger families. Our proposals then will consider the following groups to be a priority :-</p> <ul style="list-style-type: none"> • Where the applicant has children who are due to undertake GCSE's or A levels • Where the family is vulnerable – do they access the Council's Children or Adult Services
Marriage/ Civil Partnerships.	Not known	The impact of discretionary payments is not known
Pregnancy and Maternity	Positive	This group may be prioritised for support - in the short term to mitigate against undue stress (if SHP is not payable) or if the mother anyway falls into one of the key groups for assistance.

Section 4 – Mitigating Impacts and Alternative Options

From the analysis and interpretation of evidence in section 2 and 3 - Is there any evidence of or view that suggests that different equality or other protected groups (inc' staff) could have a disproportionately high/low take up of the new proposal?

Yes? No?

If yes, please detail below how evidence influenced and formed the proposal? For example, why parts of the proposals were added/removed?

In reference to sections 2 and 3, the temporary accommodation fund is more likely to be taken up by certain target groups including:

- Race
- Disability
- Gender
- Age

This is because they are more likely to be in need of this support as they are more impacted by the reforms. The proposal is based on financial need and not on certain groups.

Alternative Options

- The proposal is fundamentally about helping some of the 500+ households who are to be impacted by the benefit cap – around 100 of these possibly. Two realistic alternatives present, appreciating that the council would not be able to support, £ for £, all those in its temporary accommodation portfolio that are hit by the cap:-
 1. not offering assistance to any residents, which could be deemed as irresponsible if some groups can be helped.
 2. offering assistance to others than those suggested, or full assistance to all groups – which could increase the costs to the council substantially

Section 5 – Quality Assurance and Monitoring

Have monitoring systems been put in place to check the implementation of the proposal and recommendations?

Yes? No?

How will the monitoring systems further assess the impact on the equality target groups?

All three discretionary payment schemes will be subject to ongoing analysis and audit in order to ensure that the implementation of the proposals meet their outlined aims. They will also need to be monitored to ensure that funding remains available throughout the financial year.

Discretionary Housing Payments and the Temporary Accommodation Fund will undergo an audit once the impact of the benefit cap can be assessed. This is likely to take place towards the end of 2013 as the cap will not be fully rolled out until the end of September 2013.

The audit will address the impact on the protected characteristics where relevant and useful.

Does the policy/function comply with equalities legislation?

Yes? No?

If there are gaps in information or areas for further improvement, please list them below:

Full profile of those to be assisted, and those not so benefitting by having regard to the 9 Target Groups

How will the results of this Equality Analysis feed into the performance planning process?

The Action plan captures the intentions to analyse who is being assisted and, equally, who is not, in order to inform the extent or otherwise of any adjustments to the application of this discretionary support.

Section 6 - Action Plan

*As a result of these conclusions and recommendations what actions (if any) **will** be included in your business planning and wider review processes (team plan)? Please consider any gaps or areas needing further attention in the table below the example.*

Recommendation	Key activity	Progress milestones including target dates for either completion or progress	Officer responsible	Progress
Better analysis	Consider latest DWP scan and analyse against 9 Target Groups	June 2013 – analyse scan	LorraineDouglas	
Non-discriminatory behaviour	Apply adopted criteria to the capped households Cease once level equivalent to £1M of support achieved Analyse who is to benefit, and who isn't against 9 Target Groups	July 2013 – confirm who – total By September 2013 Understand who is to benefit and action – transfer or rent-bridging By December 2013 - complete analysis of the 100 helped and the 400 not helped	LorraineDouglas	
Responding to analysis	Consider that analysis and re-work mechanisms as appropriate	February 2014 - using analysis -inform recommendations to amend/abandon/continue support mechanism for 2014/15	LorraineDouglas	

Section 7 – Sign Off and Publication

Name: (signed off by)	Colin Cormack
Position:	Service Head, Housing Options
Date signed off: (approved)	21 st June 2013

Section 8 Appendix – FOR OFFICE USE ONLY

This section to be completed by the One Tower Hamlets team

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Link to original EQIA	Link to original EQIA
EQIAID (Team/Service/Year)	