



# EQUALITY IMPACT ASSESSMENT

## Partial Assessment Form

<b>Policy, practice, function or project assessed</b>	<b>Discretionary Housing Benefit Policy</b>
<b>Lead Officer</b>	<b>Housing Advice and Options Manager</b>
<b>Team</b>	<b>Housing Advice and Options Service</b>
<b>Start date of assessment</b>	<b>10 February 2011</b>
<b>Completion of assessment</b>	<b>18 February 2011</b>

Please use this form to record your findings in relation to the assessment of an existing policy, function, service or practice.

## **A. POLICY, PRACTICE, FUNCTION OR PROJECT TO BE ASSESSED**

### **A1. Please describe what are the main aims, objectives, purpose and intended outcomes of the policy or function?**

To determine which applicants should be prioritised for Discretionary Housing Benefit payments.

To clarify the decision making criteria and the process for appeals.

The existing policy has been reviewed to take account of changes to the Housing Benefit/Local Housing Allowance system that will come into effect from April 2011. The changes are likely to make private sector properties less affordable for households on a low income and it is anticipated that the demand for discretionary housing benefit payments will increase as a result. It is therefore necessary to ensure that the policy is fit for purpose and provides a transparent framework for assessing claims.

### **A2. Is this policy or function associated with any other Council policy or priority?**

1. Child Support, Pensions and Social Security Act 2000
2. Discretionary Financial Assistance Regulations 2001.
3. Housing Act 1996
4. Homeless Act 2002
5. Homeless Strategy, 2008-2013
6. Service targets
7. Does it support any of the council aims?

### **A3. Who are the intended beneficiaries/stakeholders of the policy or function? How many people are affected and from what sections of the community?**

Applicants from all sections of the community are able to apply but legally must be in receipt of Housing Benefit for Council Tax Benefit to be eligible for assistance. Applicants are expected to demonstrate that they require additional help to meet their housing costs. There are 65,000 households in the district and currently there are 6200 benefit claimants spread throughout this area who claim benefit due to financial concerns.

### **A4. Is the policy/function corporate and far-reaching?**

The policy is far reaching because it applies district wide. It also works across corporate areas and represents joint working between the Housing Advice and Options Service (Affordable Homes) and the Revenues and Benefits service.

**A5. Are you expecting to make any significant change to the policy or service in the near future? If so, please give details.**

The policy has been reviewed in light of the June 2010 announcements to reform the Local Housing Allowance and the subsequent increase in demand for DHP that we anticipate as a result. The policy will be reviewed after 6 months to ensure that the criteria introduced are appropriate and proportionate to manage the level of demand against budget provision. This action is included in the Action Plan.

**A6. Is this a new or existing policy or function?**

This is an existing policy that has been revised.

**B. EVIDENCE/ DATA and CONSULTATION**

It is important to consider all information that is available in determining whether the policy or function could have a differential impact. Please attach examples of monitoring information, research or consultation reports.

**B1. What monitoring or other information do you have about relevant target groups, which will show the impact of the policy or function?**

None as little data is available at present. Housing Benefit is available to all sections of the population provided the eligibility criteria are met. Consideration will be given to the feasibility of introducing monitoring information for future consideration.

**B2. Have you compared the data you have with the equality profile of the local population? What does it show?**

No data available

**B3. Have you identified any improvements or other changes that could be made from monitoring the data?**

No

**B4. Have you consulted or involved external stakeholders about the policy or function? If so, what were their views?**

No

**B5. Have you undertaken any consultation with staff to assess their perception of any impacts of the policy or function? If so, what has been learnt from them?**

The policy has been redrafted jointly between Housing Benefit and Housing Advice and Options staff. In addition staff from Housing Services and Floating Support have had the opportunity to comment on the revisions. Two main aspects of the discussions are as follows:

1. Housing Advice staff requested that the policy offer some priority for DHP to applicants at risk of homelessness but not in priority need for housing (in terms of the homelessness legislation). This is because the other housing options available to this client group are limited in comparison to other households. This consideration has been incorporated into the revised policy but the level of demand will be monitored to ascertain its feasibility long term.
2. There was general agreement to prioritise DHP claims from private sector tenants over claims from social housing tenants, although the ability remains to make payments in exceptional circumstances. This is because tenants in social housing (Council tenants and Registered Social Landlord tenants) benefit from lower rent levels than households in the private rented sector. Future changes to Housing Benefit which take effect from April 2011 will mean private sector households face additional pressures in finding affordable housing and will be unfairly disadvantaged in comparison to social housing tenants in this respect. DHP trends for the current financial year show that out of 61 approved claimants only 4 were social housing tenants. This would appear to reinforce the fact that households in the private rented sector are more likely to require DHP assistance and should be prioritised.

**B6. Please provide information about any other consultation, research, or involvement undertaken in relation to this impact assessment.**

No additional consultation. Some web based research into the DHP criteria assessment criteria utilised by other councils. The broad principles of this policy are consistent with the aims of other policies but the South Cambridgeshire policy appears to offer a more sophisticated and transparent set of criteria for assessing applications.

**C1. IMPACT OF THE POLICY OR FUNCTION**

Assess the potential impact on each of the following protected characteristics. The impact could be negative, positive or neutral. If you assess a negative impact for any of the groups then you will need to assess whether that impact is low, medium or high. Refer to the evidence you use.

DESCRIPTION OF IMPACT	Nature of Impact (Positive, Neutral, Adverse)	Extent of Impact (Low, Medium, High)
<b>AGE:</b> Identify the potential impact of the policy or function on different age groups.		
<p>Data not collected on the age of customers. Any applicant in receipt of Housing Benefit can apply for DHP funds regardless of age, it is therefore not anticipated that there will be a negative impact on any specific age group.</p> <p>Due to the fact that non-priority homeless applicants are able to apply for DHP and receive reasonable preference, single person households under the age of 35 years are likely to benefit from the revised policy. This is important because changes to the housing benefit system from April 2011 will have a significant negative impact on single people under 35 who claim housing benefit. They are therefore a key group of people who are likely to benefit from DHP whilst they seek alternative housing arrangements.</p>	<b>Positive</b>	
<b>DISABILITY:</b> Identify the potential impact of the policy or function on disabled people.		
<p>Council tax legislation already allows for a reduction in band for properties adapted for disabled occupiers and also an exemption for occupiers with a severe mental impairment. The DHP assessment framework recognises that if an applicant, or a resident family member has a disability or serious illness, this should be a supporting factor in determining whether to award DHP.</p> <p>In terms of physically completing an application for DHP, a number of mechanisms exist to facilitate this on behalf of an applicant. These are as follows:</p> <ul style="list-style-type: none"> <li>• Availability of translation services (Braille information and large print for visually impaired customers and use of type-talk and interpreters for applicants with a hearing impairment).</li> <li>• An application made on someone's behalf ie by a Social Worker, Advocate or Housing Adviser</li> <li>• Practical help and assistance in completing the form, including an on demand home visit if appropriate.</li> </ul>	<b>Neutral</b>	

<b>GENDER REASSIGNMENT:</b> Identify the potential impact of the policy or function on people that have changed gender identity.		
No data exists but policy and related homelessness legislation are applied equally regardless of gender and gender reassignment.	<b>Neutral</b>	
<b>MARRIAGE AND CIVIL PARTNERSHIPS:</b> Identify the potential impact of the policy or function on people who are married or in a civil partnership.		
No data exists. Not collected locally but no impact anticipated as all households are entitled to make a DHP application.	<b>Neutral</b>	
<b>PREGNANCY AND MATERNITY:</b> Identify the potential impact of the policy or function on pregnant or maternal mothers and those women who wish to breastfeed.		
The policy has no impact on mothers who wish to breastfeed. Applicants who are pregnant and require an additional bedroom for their baby but do not qualify for the 2 bed rate of LHA will potentially benefit from the policy as it can be used to cover the excess between the 1 bed LHA and 2 bed LHA rate pending the child's birth.	<b>Positive</b>	
<b>RACE:</b> Identify the potential impact of the policy or function on different ethnic groups, including national origins, colour and nationality.		
Information is available in different languages and translation can be arranged. Policy and related homelessness legislation are applied equally regardless of race.	<b>Neutral</b>	
<b>RELIGION/BELIEF:</b> Identify the potential impact the policy or function on different religious/faith groups.		
Policy is not restricted to applicants with a particular faith and in all cases the assessment criteria will be applied consistently.	<b>Neutral</b>	

<b>SEX:</b> Identify the potential impact of the policy or function on men and women.		
Policy applied equally to members of both sexes.	<b>Neutral</b>	
<b>SEXUAL ORIENTATION:</b> Identify the potential impact of the policy or function on lesbian, gay men, bisexual or heterosexual people.		
No data collated on sexual orientation of applicants but policy applies equally regardless of orientation.	<b>Neutral</b>	
<b>OTHER CHARACTERISTIC SPECIFIC TO SOUTH CAMBRIDGESHIRE – RURALITY:</b> Identify the potential impact of the policy or function on people who are rurally isolated.		
Application forms can be completed by post. In addition, an on demand home visit is available for applicants who are rurally isolated and unable to access the SCDC offices.	<b>Neutral</b>	

**PLEASE NOTE: Following completion of the section above, if the nature of the impact is adverse then you may need to proceed to a full equality impact assessment.**

**C2. Could you minimise or remove any adverse or potential impact that is high, medium or low significance, in advance of a full impact assessment? Explain how.**

Not Applicable



**C3. Does the policy or function actively promote equal opportunities and good community relations? Or could changes be made so that it does so?**

The policy does not discriminate against any group but does enhance the housing options available to certain groups of people who are potentially disadvantaged in terms of their housing circumstances. The policy aims to strike a balance between budgetary restrictions and customer demand.

**C4. Please provide any further information, qualitative or quantitative that does not fit into the questions but you feel has a likely impact on this assessment.**

<b>D. CONCLUSIONS</b>			
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D1. Was there sufficient data to complete the partial assessment?	Yes?	<input checked="" type="checkbox"/> √	If “NO”, what arrangements are in place for evidence gathering and continuing with the assessment?
	No?	<input type="checkbox"/>	
D2. Is the outcome of the partial assessment that the policy or function would have an adverse impact (medium or high impact) on one or more target group?	Yes?	<input type="checkbox"/>	If “YES”, will you proceed to a full assessment? If so, what arrangements are in place to carry out the full assessment?
	No?	<input checked="" type="checkbox"/> √	
D3. Is the outcome of the partial assessment that the policy or function would have a neutral or positive impact on equalities?	Yes?	<input checked="" type="checkbox"/> √	<p>If “YES”, have you included proposals in the Action Plan to further improve the impact of the policy or function on equalities?</p> <p>Yes</p> <p>Do you plan to review the service or policy again in future to assess whether there has been any change? If so, when?</p>
	No?	<input type="checkbox"/>	<p>Yes a review after 6 months to determine whether the policy is fit for purpose and is able to appropriately balance the level of demand against the funds available.</p> <p>Has the Equalities Steering Group and the Consultative Forum reviewed the assessment? If so what were their comments?</p> <p>Not as of yet.</p>

**D4. Do you have any other conclusions/outcomes from the partial assessment?**

No

**ACTION PLAN for enhancing existing practice**

<b>Recommendation/ issue to be addressed</b>	<b>Planned Milestone</b>	<b>Planned completion of milestone (date)</b>	<b>Officer Responsible</b>	<b>Progress</b>
Policy Review to ensure fit for purpose	September 2011	October 2011	Housing Advice and Options Manager	
Explore the feasibility of introducing a monitoring and review form for DHP applicants	September 2011	October 2011	Housing Advice and Options Manager	

**RESOURCES**

**Does the above action plan require any additional resources?**

No

**ARRANGEMENTS FOR MONITORING**

**Please give your plans for monitoring the achievement of the above actions.**

Joint review between Housing Advice and Options Manager and Revenues and Benefits Manager after 6 months.

**SIGN OFF: The officers below confirm that this partial assessment has been completed in accordance with the Council's guidance**

<b>Signature of Lead Officer</b>		<b>Date:</b>
<b>Signature of Corporate Manager or Chief Officer:</b>		<b>Date:</b>

**Please retain the original form on your service area and return a copy of the completed form to the Equality & Diversity Officer.**