

# Equality impact assessment form

**Directorate:** Corporate Resources

**Service area:** Revenues, Benefits & Exchequer and Customer Management

**Name of Policy, Strategy, Review or Function being assessed:** Single Discretionary Award Policy

**Date of assessment** 22 October 2019 11am – 1pm

**Signed off by:** John Massey, Head of Revenues, Benefits & Exchequer Services, and Bernard Fenton, Head of Customer Management

**Decision of Cabinet, Personnel Committee or Corporate Leadership Team:** 15 January 2020

**Date published on website:** TBD

January 2019



Derby City Council



## Equality impact assessment – please read this section first before you do the assessment

This is our equality impact assessment form to help you equality check what you are doing when you are about to produce a new policy, review an older one, write a strategy or plan or review your services and functions. In fact you need to do an equality impact assessment whenever a decision is needed that affects people and **before** that decision is made.

So why do we need to do equality impact assessments? Although the law does not require us to do them now, the courts still place significant weight on the existence of some form of documentary evidence of compliance with the **Public Sector Equality Duty** when determining judicial review cases. This method helps us to make our decisions fairly, taking into account any equality implications, so yes we still need to do them.

The Public Sector Equality Duty is part of the Equality Act 2010 and this Duty requires us as a public body to have '**due regard**' to eliminating discrimination, harassment and victimisation and any other conduct that is prohibited by or under the Act. It requires us to advance equality of opportunity and foster good relations between people who share a '**relevant protected characteristic**' and people who don't.

Having 'due regard' means:

- Removing or minimising disadvantages suffered by people due to their protected characteristics;
- Taking steps to meet the needs of people with certain protected characteristics where these are different from the needs of other people;
- Encouraging people with certain protected characteristics to participate in public life or in other activities where the participation is disproportionately low.

The protected characteristics are:

- Age;
- Disability;
- Gender identity;
- Marriage and civil partnership;
- Pregnancy and maternity;
- Race;
- Religion or belief;
- Sex;
- Sexual orientation;

This completed form should be attached to any Chief Officer Group, Cabinet or Personnel Committee report to help elected members make their decisions by taking the equality implications into account. Equality impact assessments **must be done before** decisions are made. Include the Cabinet or Personnel Committee's decision on the front sheet when you know it.

You'll find that doing these assessments will help you to:

- Understand your customers' and communities needs;
- Develop service improvements;
- Improve service satisfaction;
- Demonstrate that you have been fair and open and considered equality when working on restructuring;
- Make sure you pay due regard to the requirements of the Public Sector Equality Duty.

Don't do the form by yourself, get a small team together and make sure you include key people in the team such as representatives from our Diversity Forums and employee networks and you could invite trade union representatives too – the more knowledge around the table the better. You also need to decide how and who you will consult with to help inform the equality impact assessment.

Our Lead on Equality and Diversity can help with useful contacts – we have a team of people who are used to doing these assessments and can help with information on barriers facing particular groups and remedies to overcome these barriers.

You'll need to pull together all the information you can about how what you are assessing affects different groups of people and then examine this information to check whether some people will be negatively or positively affected. Then you'll need to look at ways of lessening any negative effects or making the service more accessible – this is where your assessment team is very useful and you can also use the wider community. Against every negative impact you will need to complete the mitigation section to explain how you will lessen the impact.

Agree an equality action plan with your assessment team, setting targets for dealing with any negative effects or gaps in information you may have found. Set up a way of monitoring these actions to make sure they are done and include them in your service business plans.

When you have completed the assessment, get it signed by your Head of Service or Service Director and **send it to our Lead on Equality and Diversity for checking and to publish on our website**. It is a public document so must not contain any jargon and be easy to understand.

Remember, we need to do these assessments as part of our everyday business, so we get our equality responsibilities right and stay within the law – Equality Act 2010.

### **Equality groups and protected characteristics**

These are the equality groups of people we need to think about when we are doing equality impact assessments and these people can be our customers or our employees and job applicants...

- Age equality – the effects on younger and older people
- Disability equality – the effects on the whole range of disabled people, including Deaf people, hearing impaired people, visually impaired people, people with mental health issues, people with learning difficulties, people living with autism and people with physical impairments
- Gender identity – the effects on trans people
- Marriage and civil partnership equality
- Pregnancy and maternity equality - women who are pregnant or who have recently had a baby, including breast feeding mothers
- Race equality – the effects on minority ethnic communities, including newer communities, Gypsies and Travellers and the Roma community
- Religion and belief or non-belief equality – the effects on religious and cultural communities, customers and employees
- Sex equality – the effects on both men and women and boys and girls
- Sexual Orientation equality – the effects on lesbians, gay men and bisexual people

### **Contact for help**

Ann Webster – Lead on Equality and Diversity

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## The form

We use the term 'policy' as shorthand on this form for the full range of policies, practices, plans, reviews, activities and procedures.

Policies will usually fall into three main categories...

- Organisational policies and functions, such as recruitment, complaints procedures, re-structures
- Key decisions such as allocating funding to voluntary organisations, budget setting
- Policies that set criteria or guidelines for others to use, such as criteria about school admissions, procurement methods, disabled facilities grants, on street parking bays

If in doubt – it's better and safer to do an Equality Impact Assessment than not to bother! You never know when we may get a legal challenge and someone applies for Judicial Review.

## What's the name of the policy you are assessing?

Single Discretionary Award Policy

## The assessment team

Names are not provided here, to protect anonymity.

Team leaders' job titles:

- Head of Revenues, Benefits & Exchequer Services and
- Head of Customer Management

Other team members:

Job title	Organisation	Area of expertise
Benefits Service Manager	Derby City Council	Benefits / Single Discretionary Award
Welfare Reform Officer	Derby City Council	Local Assistance / Single Discretionary Award
Benefits Transition Manager	Derby City Council	EIA admin
Senior Welfare Rights Officer	Derby Homes	Benefits advice
Representative from Disability Equality Hub		Disability issues
Representative from 60+ Forum		Issues relating to age in the community

Written representations from three other members of the Equality Hubs were also considered during the meeting.

## Step 1 – setting the scene

Make sure you have clear aims and objectives on what you are impact assessing – this way you keep to the purpose of the assessment and are less likely to get side tracked.

### 1 What are the main aims, objectives and purpose of the policy? How does it fit in with the wider aims of the Council and wider Derby Plan? Include here any links to the Council Plan, Derby Plan or your Directorate Service Plan.

The Single Discretionary Award (SDA) Policy provides support for those who have a low income, or no income, to pay their rent and Council Tax. It also provides a support programme which includes money advice, digital skills support, housing advice, health and well being advice, benefits advice and better off calculation (an assessment of income and outgoings to help applicants better manage their money), education and training towards work support.

The SDA Policy sets out how we administer the SDA in Derby, and how we decide whether or not someone who makes a claim will receive support. The SDA is made up of Discretionary Housing Payments (DHPs), Council Tax Hardship (CTH) and Local Assistance (LAS).

DHPs can provide help with rent payments for some benefit claimants who live in rented housing.

The funding for DHPs from Central Government for 2019/20 has been reduced and the consultation considers limiting recipients of DHPs to one award (of up to six months) in any one financial year. The proposed change would mean that from 1 April 2020 it would not be possible for SDA claimants to receive a second DHP award during the same financial year. In 2018/19 this would have affected 176 households.

There are no guarantees that Derby's DHP allocation will increase in 2020/21, so the proposed change is designed to ensure that from next year the awards made are financially viable and can continue to help those in need. Any subsequent policy alterations that are discussed would also be made in order to ensure that the award can be delivered effectively to those who are eligible.

The proposed change will not affect our Priority Groups, who can receive up to 12 months' award in the same financial year. People in our Priority Groups are:

- Foster carers;
- Carers;
- Households where substantial disabled adaptations have been undertaken to meet the disability needs of a household member;
- Households with a child who is unable to share a bedroom due to disability and where any of the following applies:
  - There is a claim for child Disability Living Allowance care component at the middle or highest rate in payment. For clarification, the criteria specifies "claim" and not "award" as this terminology safeguards the benefit entitlement of those households where the child attends residential school. This ensures that the Housing Benefit calculation treats the child's address as being their main home continuously throughout the claim and affords protection to the family's income from benefits.
  - There is no entitlement to Disability Living Allowance care component at the middle or highest rate but the child has a disability that may be particularly disruptive.

For clarification, Personal Independence Payment (PIP) is not referred to here, as children are not entitled to PIP.

**2 Who delivers/will deliver the policy, including any consultation on it and any outside organisations who deliver under procurement arrangements?**

The Policy is delivered by the Benefits Service and the Council Tax Service from Revenues, Benefits & Exchequer Services, and the Welfare Reform team in the Customer Management service.

**3 Who are the main customers, users, partners, employees or groups affected by this proposal?**

- People who claim SDA who need help with their rent and who have already had one DHP award made during the financial year;
- In 2018/19 176 people received second DHP awards; these have all been identified and the Council wrote to as many of them as possible when this consultation was launched, to advise them about the proposed change and how to take part in the consultation if they wished to. It was noted that the number who would have been affected by the proposed change last year (176) had dropped by around 90 compared to the previous year;
- The Council has also written to any one who has received a second DHP award during 2019/20 during the consultation period, with the same information;
- Derby Homes;
- Social landlords;
- Private landlords.

## Step 2 – collecting information and assessing impact

### 4 Who have you consulted and engaged with so far about this policy, and what did they tell you? Who else do you plan to consult with? – tell us here how you did this consultation and how you made it accessible for the equality groups, such as accessible locations, interpreters and translations, accessible documents.

Staff and managers of the Benefits Service, Customer Management and other Council services for example Housing Options and Derby Advice.

We are conducting a public consultation. The consultation communication is designed to reach as many Derby residents as possible, and includes the following actions:

- Promotion across social media – Facebook & Twitter;
- Promotion to all staff by an in-house corporate briefing;
- Derby Newsroom item;
- Emails to appropriate partners / stakeholders / forums to raise awareness of the consultation and how to take part. This includes the main Registered Social Landlords (Derby Homes, Metropolitan, Derwent Living, Nottingham Community Housing Association, Riverside, East Midlands Homes, Tuntum Housing), also Citizen's Advice, the Strategic Housing Group (our local RSL liaison group) and the local Department of Work and Pensions;
- Briefings have been provided for the Derby City Learning Disability Partnership Board, Derby 60+ Forum, Disability and Race Equality Hubs;
- Letters have been written to all those who received a second DHP award during 2018/19, and those who have received a second award during most of the consultation period;
- Easy read version to be produced;
- Paper versions of the consultation form are available for people who cannot participate on-line.

#### Other feedback received from the EIA:

1. There is no mention of consultation methods for people who cannot read – who are quite likely to be in the affected groups.  
**Response** - the Council can produce an Easy Read version of the consultation materials if requested. This will consist of mainly pictures, with some words. This may be helpful. For anyone unable to read/write any English at all, if they make themselves known to the Council they will be assisted on a face to face basis to take part in the consultation.
2. Does the phrase "Person from Abroad" (Policy, section 4) mean a negative impact on the Race group?  
**Response:** this will be rephrased to clarify that there is no entitlement to an award under the SDA Policy where a person does not have recourse to public funds.

**5 Using the skills and knowledge in your assessment team, and from any consultation you have done, what do you already know about the equality impact of the policy on particular groups? Also, use any other information you know about such as any customer feedback, surveys, national research or data. Indicate by a tick for each protected characteristic group whether this is a negative or a positive impact. If it's negative, fill in the mitigation section as well to explain how you are going to lessen the impact.**

It was noted at the outset that, apart from people in the Priority Groups, *everyone* who wanted a second DHP award in the same financial year would be adversely affected by the proposed change. Therefore the EIA has endeavoured to identify if there is anyone within the equality strands who would be *disproportionately* affected by the proposed change.

**Age**

What do you already know?	Positive impact	Negative impact	Mitigation
People in Priority Groups will not be affected by the change – therefore no impact.			
<p>The vast majority of DHP awards are made to offset the Government's under occupancy restrictions when they are applied against awards of Housing Benefit or Universal Credit Housing Costs. This only affects those at working age.  <i>[Extra detail added after meeting as a result of more clarification: Under occupancy can affect pensioners if they live in privately rented accommodation and their property is deemed too large for their needs. (This is under a different Housing Benefit Scheme).</i>                      People who have claimed a second DHP award during either 2018/19 or 2019/20 will be in this equality strand, although there is no characteristic based on age which makes them disproportionately more affected than anyone else, as both those at working age and pensioners can be affected. Generally, the need for a DHP is created by a person's income, household and size of their property, not their age.]                      Noted that no one would be affected by the proposed change until October 2020, so this allows time for the Council to work with individuals who</p>			<ol style="list-style-type: none"> <li>1. The Council will write (in general terms) to the landlords of those people who would be potentially affected before the proposed change comes into force, to raise awareness of the impending change and the support which is available for affected tenants.</li> <li>2. Safeguards will be put in place for those potentially affected. The Council will do direct interventions – a Community Outreach Programme - for the 176 people identified from 2018/19 and the people who receive second DHP awards during 2019/20. Caseworker(s) will be allocated to help people, who choose to engage with the assistance, to prepare for the proposed change. The purpose of the interventions will be to raise awareness of the change and to offer proactive tailored support to help them make positive changes so they no longer require a DHP. This will include benefits take up work with Derby Advice.</li> <li>3. To support the interventions in 2 above, the Council will also work with local Community Groups to explore how support can be provided locally for those struggling to engage with the Council online when accessing its services.</li> </ol>

What do you already know?	Positive impact	Negative impact	Mitigation
<p>may be affected.</p> <p>We have proposed some mitigation to combat those instances where people may be affected to ensure they are supported as far as possible.</p> <p><i>[Extra detail added after consultation feedback received.]</i></p> <p>Single people under the age of 35 can be disproportionately affected – they are more likely to need a DHP award as they will be entitled to less Housing Benefit due to their age (known as the Single Room Rent)]</p>		X	See actions above

### Disability

What do you already know?	Positive impact	Negative impact	Mitigation
<p>People in Priority Groups will not be affected by the change – therefore no impact</p>			
<p>People who have claimed a second DHP award during either 2018/19 or 2019/20 may be in this equality strand, although there is no characteristic which makes them disproportionately more affected than anyone else.</p> <p>Noted that no one would be affected by the proposed change until October 2020, so this allows time for the Council to work with individuals who may be affected.</p> <p>We have proposed some mitigation to combat those instances where people have been affected to ensure they are supported as far as possible.</p>			<ol style="list-style-type: none"> <li>1. The Council will write (in general terms) to the landlords of those people who would be potentially affected before the proposed change comes into force, to raise awareness of the impending change and the support which is available for affected tenants.</li> <li>2. Safeguards will be put in place for those potentially affected. The Council will do direct interventions – a Community Outreach Programme - for the 176 people identified from 2018/19 and the people who receive second DHP awards during 2019/20. Caseworker(s) will be allocated to help people, who choose to engage with the assistance, to prepare for the proposed change. The purpose of the interventions will be to raise awareness of the change and to offer proactive tailored support to help them make positive changes so they no longer require a DHP. This will include benefits take up work with Derby Advice.</li> <li>3. To support the interventions in 2 above, the Council will also work with local Community Groups to explore how support can be</li> </ol>

What do you already know?	Positive impact	Negative impact	Mitigation
			provided locally for those struggling to engage with the Council online when accessing its services.

### Gender identity- trans

What do you already know?	Positive impact	Negative impact	Mitigation
People in Priority Groups will not be affected by the change – therefore no impact			
<p>People who have claimed a second DHP award during either 2018/19 or 2019/20 may be in this equality strand, although there is no characteristic which makes them disproportionately more affected than anyone else.</p> <p>Noted that no one would be affected by the proposed change until October 2020, so this allows time for the Council to work with individuals who may be affected.</p> <p>We have proposed some mitigation to combat those instances where people have been affected to ensure they are supported as far as possible.</p>			<ol style="list-style-type: none"> <li>1. The Council will write (in general terms) to the landlords of those people who would be potentially affected before the proposed change comes into force, to raise awareness of the impending change and the support which is available for affected tenants.</li> <li>2. Safeguards will be put in place for those potentially affected. The Council will do direct interventions – a Community Outreach Programme - for the 176 people identified from 2018/19 and the people who receive second DHP awards during 2019/20. Caseworker(s) will be allocated to help people, who choose to engage with the assistance, to prepare for the proposed change. The purpose of the interventions will be to raise awareness of the change and to offer proactive tailored support to help them make positive changes so they no longer require a DHP. This will include benefits take up work with Derby Advice.</li> </ol>

### Marriage and Civil Partnership

What do you already know?	Positive impact	Negative impact	Mitigation
People in Priority Groups will not be affected by the change – therefore no impact			
People who have claimed a second DHP award during either 2018/19 or 2019/20 may			1. The Council will write (in general terms) to the landlords of those people who would be potentially

<p>be in this equality strand, although there is no characteristic which makes them disproportionately more affected than anyone else.</p> <p>Noted that no one would be affected by the proposed change until October 2020, so this allows time for the Council to work with individuals who may be affected.</p> <p>We have proposed some mitigation to combat those instances where people have been affected to ensure they are supported as far as possible.</p>			<p>affected before the proposed change comes into force, to raise awareness of the impending change and the support which is available for affected tenants.</p> <p>2. Safeguards will be put in place for those potentially affected. The Council will do direct interventions – a Community Outreach Programme - for the 176 people identified from 2018/19 and the people who receive second DHP awards during 2019/20. Caseworker(s) will be allocated to help people, who choose to engage with the assistance, to prepare for the proposed change. The purpose of the interventions will be to raise awareness of the change and to offer proactive tailored support to help them make positive changes so they no longer require a DHP. This will include benefits take up work with Derby Advice.</p>
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### **Pregnancy and maternity**

<b>What do you already know?</b>	<b>Positive impact</b>	<b>Negative impact</b>	<b>Mitigation</b>
<p>People in Priority Groups will not be affected by the change – therefore no impact</p>			
<p>People who have claimed a second DHP award during either 2018/19 or 2019/20 may be in this equality strand, although there is no characteristic which makes them disproportionately more affected than anyone else.</p> <p>Noted that no one would be affected by the proposed change until October 2020, so this allows time for the Council to work with individuals who may be affected.</p> <p>We have proposed some mitigation to combat those instances where people have been affected to ensure they are supported as far as possible.</p>			<p>1. The Council will write (in general terms) to the landlords of those people who would be potentially affected before the proposed change comes into force, to raise awareness of the impending change and the support which is available for affected tenants.</p> <p>2. Safeguards will be put in place for those potentially affected. The Council will do direct interventions – a Community Outreach Programme - for the 176 people identified from 2018/19 and the people who receive second DHP awards during 2019/20. Caseworker(s) will be allocated to help people, who choose to engage with the assistance, to prepare for the proposed change. The purpose of the interventions will be to raise</p>

			awareness of the change and to offer proactive tailored support to help them make positive changes so they no longer require a DHP. This will include benefits take up work with Derby Advice.
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### Race

What do you already know?	Positive impact	Negative impact	Mitigation
People in Priority Groups will not be affected by the change – therefore no impact			
<p>People who have claimed a second DHP award during either 2018/19 or 2019/20 will be in this equality strand, although there is no characteristic which makes them disproportionately more affected than anyone else.</p> <p>Noted that no one would be affected by the proposed change until October 2020, so this allows time for the Council to work with individuals who may be affected.</p> <p>We have proposed some mitigation to combat those instances where people have been affected to ensure they are supported as far as possible.</p>			<ol style="list-style-type: none"> <li>1. The Council will write (in general terms) to the landlords of those people who would be potentially affected before the proposed change comes into force, to raise awareness of the impending change and the support which is available for affected tenants.</li> <li>2. Safeguards will be put in place for those potentially affected. The Council will do direct interventions – a Community Outreach Programme - for the 176 people identified from 2018/19 and the people who receive second DHP awards during 2019/20. Caseworker(s) will be allocated to help people, who choose to engage with the assistance, to prepare for the proposed change.</li> </ol> <p>The purpose of the interventions will be to raise awareness of the change and to offer proactive tailored support to help them make positive changes so they no longer require a DHP. This will include benefits take up work with Derby Advice.</p>

### Religion or belief or none

What do you already know?	Positive impact	Negative impact	Mitigation
People in Priority Groups will not be affected by the change – therefore no impact			

<p>People who have claimed a second DHP award during either 2018/19 or 2019/20 will be in this equality strand, although there is no characteristic which makes them disproportionately more affected than anyone else.</p> <p>Noted that no one would be affected by the proposed change until October 2020, so this allows time for the Council to work with individuals who may be affected.</p> <p>We have proposed some mitigation to combat those instances where people have been affected to ensure they are supported as far as possible.</p>			<ol style="list-style-type: none"> <li>1. The Council will write (in general terms) to the landlords of those people who would be potentially affected before the proposed change comes into force, to raise awareness of the impending change and the support which is available for affected tenants.</li> <li>2. Safeguards will be put in place for those potentially affected. The Council will do direct interventions – a Community Outreach Programme - for the 176 people identified from 2018/19 and the people who receive second DHP awards during 2019/20. Caseworker(s) will be allocated to help people, who choose to engage with the assistance, to prepare for the proposed change.</li> </ol> <p>The purpose of the interventions will be to raise awareness of the change and to offer proactive tailored support to help them make positive changes so they no longer require a DHP. This will include benefits take up work with Derby Advice.</p>
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### Sex

What do you already know?	Positive impact	Negative impact	Mitigation
<p>People in Priority Groups will not be affected by the change – therefore no impact</p>			
<p>People who have claimed a second DHP award during either 2018/19 or 2019/20 will be in this equality strand, although there is no characteristic which makes them disproportionately more affected than anyone else.</p> <p>Noted that no one would be affected by the proposed change until October 2020, so this allows time for the Council to work with individuals who may be affected.</p> <p>We have proposed some mitigation to combat those instances where people have been affected to ensure they are supported as far as possible.</p>			<ol style="list-style-type: none"> <li>1. The Council will write (in general terms) to the landlords of those people who would be potentially affected before the proposed change comes into force, to raise awareness of the impending change and the support which is available for affected tenants.</li> <li>2. Safeguards will be put in place for those potentially affected. The Council will do direct interventions – a Community Outreach Programme - for the 176 people identified from 2018/19 and the people who receive second DHP awards during 2019/20. Caseworker(s)</li> </ol>

			<p>will be allocated to help people, who choose to engage with the assistance, to prepare for the proposed change.</p> <p>The purpose of the interventions will be to raise awareness of the change and to offer proactive tailored support to help them make positive changes so they no longer require a DHP. This will include benefits take up work with Derby Advice.</p>
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### Sexual orientation

What do you already know?	Positive impact	Negative impact	Mitigation
People in Priority Groups will not be affected by the change – therefore no impact			
<p>People who have claimed a second DHP award during either 2018/19 or 2019/20 will be in this equality strand, although there is no characteristic which makes them disproportionately more affected than anyone else.</p> <p>Noted that no one would be affected by the proposed change until October 2020, so this allows time for the Council to work with individuals who may be affected.</p> <p>We have proposed some mitigation to combat those instances where people have been affected to ensure they are supported as far as possible.</p>			<ol style="list-style-type: none"> <li>1. The Council will write (in general terms) to the landlords of those people who would be potentially affected before the proposed change comes into force, to raise awareness of the impending change and the support which is available for affected tenants.</li> <li>2. Safeguards will be put in place for those potentially affected. The Council will do direct interventions – a Community Outreach Programme - for the 176 people identified from 2018/19 and the people who receive second DHP awards during 2019/20. Caseworker(s) will be allocated to help people, who choose to engage with the assistance, to prepare for the proposed change.</li> </ol> <p>The purpose of the interventions will be to raise awareness of the change and to offer proactive tailored support to help them make positive changes so they no longer require a DHP. This will include benefits take up work with Derby Advice.</p>

**Important** - For any of the equality groups you don't have any information about, then make it an equality action at the end of this assessment to find out. This doesn't mean that you can't complete the assessment without the information, but you need to follow up the action and if necessary, review the assessment later. You can get lots of information on reports done from organisations' websites such as the Equality and

Human Rights Commission, Stonewall, Press for Change, Joseph Rowntree Trust and so on. Please don't put down that the impact affects 'everyone the same' – it never does!

**6 From the information you have collected, how are you going to lessen any negative impact on any of the equality groups? How are you going to fill any gaps in information you have discovered?**

Everyone who wanted a second DHP award in the same financial year would be adversely affected by the proposed change, and people from all the equality strands may be included in those particularly affected by the proposed change. However they will not be disproportionately affected by the proposed change.

It was noted that no one would be affected by the proposed change until October 2020, so this allows time for the Council to work with individuals who may be affected.

We have proposed some mitigation to combat those instances where people have been affected to ensure they are supported as far as possible.

Specifically:

1. The Council will write (in general terms) to the landlords of those people who would be potentially affected before the proposed change comes into force, to raise awareness of the impending change and the support which is available for affected tenants.
2. Safeguards will be put in place for those potentially affected. The Council will do direct interventions – a Community Outreach Programme - for the 176 people identified from 2018/19 and the people who receive second DHP awards during 2019/20. Caseworker(s) will be allocated to help people, who choose to engage with the assistance, to prepare for the proposed change.  
The purpose of the interventions will be to raise awareness of the change and to offer proactive tailored support to help them make positive changes so they no longer require a DHP. This will include benefits take up work with Derby Advice.
3. To support the interventions in 2 above, the Council will also work with local Community Groups to explore how support can be provided locally for those struggling to engage with the Council online when accessing its services.

To ensure all those people in Priority Groups have been identified, the Council is aware of those customers who are Foster Carers, Carers, and the properties owned by Derby Homes and the major Registered Social Landlords that have been adapted to accommodate disability needs. The Council is also aware of those instances where children require an extra bedroom, as their parent(s)/guardian(s) will provide that information when claiming benefit.

The Council has already written to the people most likely to be affected by the proposed change. This group may increase during 2019/20 as more people make DHP claims for second awards. When SDA claims are made the Council will make people aware of the proposed change, and help them prepare for it as best we can by helping them make long term changes to their circumstances where possible.

## Other discussion points during the EIA

The group discussed the difficulties involved for some people to use online facilities and claim forms.

- Many people with illness, particularly those of the nervous system struggle with any kind of online transaction – example provided of Blue Badge claim form;
- It was also raised that some people who settled in the UK many years ago face barriers of language and age and living alone. There is an assumption that they are being helped by the younger generation in their families, but this is not always the case;
- Other feedback (in summary) – only accepting online applications is discriminatory; it has always been the Council's policy to accept paper applications where there is good reason to. Not everyone is computer literate. As the Scheme is for those on very low incomes they may not have access to the technology required. Although equipment is available at the Council House, cost of travel and time required to go there is a disadvantage. It is not open evenings or weekends and library opening hours are reduced so computer access may be difficult. Access may be difficult for carers who may not be able to leave the person they're caring for. Insisting on online application only, may well impact on all protected groups. People may be put off trying. Assistance may be available, but do people have to suffer the embarrassment of admitting help is needed. If struggling to buy food, paying for internet access would not be high on list of priorities. Has anyone tried doing an online application on a mobile phone? This may be the only online access that some people have.

### Responses:

It was advised that the Benefits Service can offer visits to people's homes to help them complete the online forms / complete them on their behalf. There are also paper versions of the majority of forms the Service has. There are colleagues who speak Punjabi on the front line; the Council does recognise the issue. By definition anyone who receives Housing Benefit/Council Tax Support is vulnerable so we go the extra mile to help them. For our Priority Groups, we know who those customers are and we ring them up every April to invite them to make a fresh claim, sometimes completing the online claim form with them over the phone and sometimes sending out a form with a prepaid envelope if necessary, recognising that some people prefer to complete claims themselves.

Using the online forms has been tested on mobile phones to make sure they render on the screens satisfactorily, and the form works. This is part of the standard testing that is done by the Benefits Service when any change is made to this part of the service, as we recognise that this is the only internet access that a large proportion of our client base have.

For the Customer Management Service – role is wider, and we are aware customers can be put off by the online forms. If customers come in to the Council House staff will help them. We have a diverse staff with different language skills and first-hand experience of some of the health issues that customers may have. Customers are treated with sensitivity. They can be helped to complete the online forms or paper forms as appropriate.

Views were sought from the Hub members about what the Council could do to help customers with barriers. Feedback was that we could go out to Community Centre Groups – liaise with these and provide some training and communication so that people can be better informed and assisted. Concern was raised by Hub member about whether funding would be allowed to permit this.

Agreed that this kind of activity would help case workers better understand the issues so that solutions could be sought.

It was also raised by Hub member that there had previously been networking done between various groups, although this had stalled in more recent times, but it was hoped that this would re-start. It was agreed that outreach work could be done, but it would need a group of people committed to doing this.

Noted that the EIA and other customer feedback gathered during the consultation must be taken into account by Cabinet when making its decision about the Policy for 2020/21.

### Step 3 – deciding on the outcome

#### 7 What outcome does this assessment suggest you take? – You might find more than one applies. Please also tell us why you have come to this decision?

<b>Outcome 1</b>	X	<b>No major change needed</b> – the EIA meeting did not identify any potential for discrimination or negative impact and all opportunities to advance equality have been taken. However, consultation feedback identified an equalities impact, namely on those younger people in privately rented accommodation who are unable to qualify for a higher rate of Housing Benefit due to being single and aged under 35.
<b>Outcome 2</b>		<b>Adjust the policy</b> to remove barriers identified by the EIA or better advance equality. Are you satisfied that the proposed adjustments will remove the barriers you identified?
<b>Outcome 3</b>		<b>Continue the policy</b> despite potential for negative impact or missed opportunities to advance equality identified. You will need to make sure the EIA clearly sets out the justifications for continuing with it. You need to consider whether there are: <ul style="list-style-type: none"> <li>• sufficient plans to stop or minimise the negative impact</li> <li>• mitigating actions for any remaining negative impacts</li> <li>• plans to monitor the actual impact.</li> </ul>
<b>Outcome 4</b>		<b>Stop and rethink</b> the policy when the EIA shows actual or potential unlawful discrimination

Our Assessment team has agreed Outcome number(s)

**Outcome 1**

Why did you come to this decision?

People who are in any of the equality groups will not be more disproportionately affected than people who are not in any equality groups, other than those younger people in privately rented accommodation who are unable to qualify for a higher rate of Housing Benefit due to being single and aged under 35.

It was noted that no one would be affected by the proposed change until October 2020, so this allows time for the Council to work with individuals who may be affected.

We have proposed some mitigation to combat those instances where people have been affected to ensure they are supported as far as possible – these are listed in Section 6.

If you have decided on **Outcome 3**, then please tell us here the justification for continuing with the policy. You also need to make sure that there are actions in the Equality Action Plan to lessen the effect of the negative impact. This is really important and may face a legal challenge in the future.

If you have decided on **Outcome 4** then if the proposal continues, without any mitigating actions, it may be likely that we will face a legal challenge and possibly a Judicial Review on the process - it is really important that the equality impact assessment is done thoroughly, as this is what the Judge will consider.

#### Step 4 – equality action plan – setting targets and monitoring

**8 Fill in this table with the equality actions you have come up with during the assessment. Indicate how you plan to monitor the equality impact of the proposals, once they have been implemented.**

#### Equality Action Plan –setting targets and monitoring

Everyone who wanted a second DHP award in the same financial year would be adversely affected by the proposed change, and people from all the equality strands may be included in those particularly affected by the proposed change.

#### Age

What are we going to do to advance equality	What difference will it make	When will we do it and who will lead	Monitoring arrangements
Safeguards will be put in place for those potentially affected. The Council will do direct interventions – a Community Outreach Programme - for the 176 people identified from 2018/19 and the people who receive second DHP awards during 2019/20. Caseworker(s) will be allocated to help people, who choose to engage with the assistance, to prepare for the proposed change. To support the interventions the Council will also work with local Community Groups to explore how support can be provided locally for those struggling to engage with the Council online when accessing its services.	The purpose of the interventions will be to raise awareness of the change and to offer proactive tailored support to help people make positive changes so they no longer require a DHP. This will include benefits take up work with Derby Advice. The success of this will depend on the affected people engaging with the support on offer.	The Outreach Programme will be ongoing.  Welfare Reform team will lead this.	The original list of those expected to be affected will be kept "live" and tracked to monitor progress on how many people are offered and benefit from the help provided.

#### Disability

What are we going to do to advance equality	What difference will it make	When will we do it and who will lead	Monitoring arrangements
Safeguards will be put in place for those potentially affected. The Council will do direct interventions – a Community Outreach Programme - for the 176 people identified from 2018/19 and the people who receive second DHP awards during 2019/20. Caseworker(s) will be allocated to help people, who choose to engage with the assistance, to prepare for the	The purpose of the interventions will be to raise awareness of the change and to offer proactive tailored support to help people make positive changes so they no longer require a DHP. This will include benefits take up work with Derby Advice. The success of this will	The Outreach Programme will be ongoing.  Welfare Reform team will lead this.	The original list of those expected to be affected will be kept "live" and tracked to monitor progress on how many people are offered and benefit from the help provided.

<b>What are we going to do to advance equality</b>	<b>What difference will it make</b>	<b>When will we do it and who will lead</b>	<b>Monitoring arrangements</b>
proposed change. To support the interventions the Council will also work with local Community Groups to explore how support can be provided locally for those struggling to engage with the Council online when accessing its services.	depend on the affected people engaging with the support on offer.		

### **Gender identity – trans**

<b>What are we going to do to advance equality</b>	<b>What difference will it make</b>	<b>When will we do it and who will lead</b>	<b>Monitoring arrangements</b>
Safeguards will be put in place for those potentially affected. The Council will do direct interventions – a Community Outreach Programme - for the 176 people identified from 2018/19 and the people who receive second DHP awards during 2019/20. Caseworker(s) will be allocated to help people, who choose to engage with the assistance, to prepare for the proposed change.	The purpose of the interventions will be to raise awareness of the change and to offer proactive tailored support to help people make positive changes so they no longer require a DHP. This will include benefits take up work with Derby Advice. The success of this will depend on the affected people engaging with the support on offer.	The Outreach Programme will be ongoing.  Welfare Reform team will lead this.	The original list of those expected to be affected will be kept "live" and tracked to monitor progress on how many people are offered and benefit from the help provided.

### **Marriage and Civil Partnership**

<b>What are we going to do to advance equality</b>	<b>What difference will it make</b>	<b>When will we do it and who will lead</b>	<b>Monitoring arrangements</b>
Safeguards will be put in place for those potentially affected. The Council will do direct interventions – a Community Outreach Programme - for the 176 people identified from 2018/19 and the people who receive second DHP awards during 2019/20. Caseworker(s) will be allocated to help people, who choose to engage with the assistance, to prepare for the proposed change.	The purpose of the interventions will be to raise awareness of the change and to offer proactive tailored support to help people make positive changes so they no longer require a DHP. This will include benefits take up work with Derby Advice. The success of this will depend on the affected people engaging with the	The Outreach Programme will be ongoing.  Welfare Reform team will lead this.	The original list of those expected to be affected will be kept "live" and tracked to monitor progress on how many people are offered and benefit from the help provided.

<b>What are we going to do to advance equality</b>	<b>What difference will it make</b>	<b>When will we do it and who will lead</b>	<b>Monitoring arrangements</b>
	support on offer.		

### **Pregnancy and maternity**

<b>What are we going to do to advance equality</b>	<b>What difference will it make</b>	<b>When will we do it and who will lead</b>	<b>Monitoring arrangements</b>
Safeguards will be put in place for those potentially affected. The Council will do direct interventions – a Community Outreach Programme - for the 176 people identified from 2018/19 and the people who receive second DHP awards during 2019/20. Caseworker(s) will be allocated to help people, who choose to engage with the assistance, to prepare for the proposed change.	The purpose of the interventions will be to raise awareness of the change and to offer proactive tailored support to help people make positive changes so they no longer require a DHP. This will include benefits take up work with Derby Advice. The success of this will depend on the affected people engaging with the support on offer.	The Outreach Programme will be ongoing.  Welfare Reform team will lead this.	The original list of those expected to be affected will be kept "live" and tracked to monitor progress on how many people are offered and benefit from the help provided.

### **Race**

<b>What are we going to do to advance equality</b>	<b>What difference will it make</b>	<b>When will we do it and who will lead</b>	<b>Monitoring arrangements</b>
Safeguards will be put in place for those potentially affected. The Council will do direct interventions – a Community Outreach Programme - for the 176 people identified from 2018/19 and the people who receive second DHP awards during 2019/20. Caseworker(s) will be allocated to help people, who choose to engage with the assistance, to prepare for the proposed change.	The purpose of the interventions will be to raise awareness of the change and to offer proactive tailored support to help people make positive changes so they no longer require a DHP. This will include benefits take up work with Derby Advice. The success of this will depend on the affected people engaging with the support on offer.	The Outreach Programme will be ongoing.  Welfare Reform team will lead this.	The original list of those expected to be affected will be kept "live" and tracked to monitor progress on how many people are offered and benefit from the help provided.

**Religion or belief or none**

<b>What are we going to do to advance equality</b>	<b>What difference will it make</b>	<b>When will we do it and who will lead</b>	<b>Monitoring arrangements</b>
Safeguards will be put in place for those potentially affected. The Council will do direct interventions – a Community Outreach Programme - for the 176 people identified from 2018/19 and the people who receive second DHP awards during 2019/20. Caseworker(s) will be allocated to help people, who choose to engage with the assistance, to prepare for the proposed change.	The purpose of the interventions will be to raise awareness of the change and to offer proactive tailored support to help people make positive changes so they no longer require a DHP. This will include benefits take up work with Derby Advice. The success of this will depend on the affected people engaging with the support on offer.	The Outreach Programme will be ongoing.  Welfare Reform team will lead this.	The original list of those expected to be affected will be kept "live" and tracked to monitor progress on how many people are offered and benefit from the help provided.

**Sex**

<b>What are we going to do to advance equality</b>	<b>What difference will it make</b>	<b>When will we do it and who will lead</b>	<b>Monitoring arrangements</b>
Safeguards will be put in place for those potentially affected. The Council will do direct interventions – a Community Outreach Programme - for the 176 people identified from 2018/19 and the people who receive second DHP awards during 2019/20. Caseworker(s) will be allocated to help people, who choose to engage with the assistance, to prepare for the proposed change.	The purpose of the interventions will be to raise awareness of the change and to offer proactive tailored support to help people make positive changes so they no longer require a DHP. This will include benefits take up work with Derby Advice. The success of this will depend on the affected people engaging with the support on offer.	The Outreach Programme will be ongoing.  Welfare Reform team will lead this.	The original list of those expected to be affected will be kept "live" and tracked to monitor progress on how many people are offered and benefit from the help provided.

**Sexual orientation**

<b>What are we going to do to advance equality</b>	<b>What difference will it make</b>	<b>When will we do it and who will lead</b>	<b>Monitoring arrangements</b>
Safeguards will be put in place for those potentially affected. The Council will do direct interventions – a Community Outreach Programme - for the	The purpose of the interventions will be to raise awareness of the change and to offer proactive tailored support	The Outreach Programme will be ongoing.	The original list of those expected to be affected will be kept "live" and tracked to monitor progress on how many

<b>What are we going to do to advance equality</b>	<b>What difference will it make</b>	<b>When will we do it and who will lead</b>	<b>Monitoring arrangements</b>
<p>176 people identified from 2018/19 and the people who receive second DHP awards during 2019/20. Caseworker(s) will be allocated to help people, who choose to engage with the assistance, to prepare for the proposed change.</p>	<p>to help people make positive changes so they no longer require a DHP. This will include benefits take up work with Derby Advice. The success of this will depend on the affected people engaging with the support on offer.</p>	<p>Welfare Reform team will lead this.</p>	<p>people are offered and benefit from the help provided.</p>

We can give you this information in any other way, style or language that will help you access it. Please contact us on: 01332 643722  
Minicom: 01332 640666

### Polish

Aby ułatwić Państwu dostęp do tych informacji, możemy je Państwu przekazać w innym formacie, stylu lub języku.

Prosimy o kontakt: **01332 643722** Tel. tekstowy: 01332 640666

### Punjabi

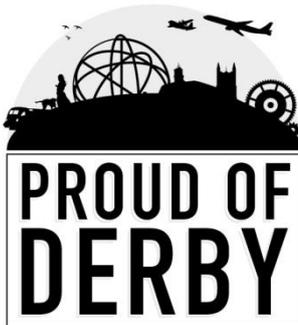
ਇਹ ਜਾਣਕਾਰੀ ਅਸੀਂ ਤੁਹਾਨੂੰ ਕਿਸੇ ਵੀ ਹੋਰ ਤਰੀਕੇ ਨਾਲ, ਕਿਸੇ ਵੀ ਹੋਰ ਰੂਪ ਜਾਂ ਬੋਲੀ ਵਿੱਚ ਦੇ ਸਕਦੇ ਹਾਂ, ਜਿਹੜੀ ਇਸ ਤੱਕ ਪਹੁੰਚ ਕਰਨ ਵਿੱਚ ਤੁਹਾਡੀ ਸਹਾਇਤਾ ਕਰ ਸਕਦੀ ਹੋਵੇ। ਕਿਰਪਾ ਕਰਕੇ ਸਾਡੇ ਨਾਲ ਟੈਲੀਫੋਨ **01332 643722** ਮਿਨੀਕਮ 01332 640666 ਤੇ ਸੰਪਰਕ ਕਰੋ।

### Slovakian

Túto informáciu vám môžeme poskytnúť iným spôsobom, štýlom alebo v inom jazyku, ktorý vám pomôže k jej sprístupneniu. Skontaktujte nás prosím na tel.č: 01332 643722 Minicom 01332 640666

### Urdu

یہ معلومات ہم آپ کو کسی دیگر ایسے طریقے، انداز اور زبان میں مہیا کر سکتے ہیں جو اس تک رسائی میں آپ کی مدد کرے۔ براہ کرم **01332 643722** پر ہم سے رابطہ کریں۔



Derby City Council