

## Appendix 6

### Equality Impact and Outcome Assessment

<b>Title of EIA<sup>1</sup></b>	Household Support Fund 23/24, appendix 6 to Household Support Fund and Cost of Living Update (CoL) P&R (recovery) Committee report	<b>ID No.<sup>2</sup></b>	<b>HSF 23/24</b>
<b>Team/Department<sup>3</sup></b>	Welfare, Revenues & Business Support (WRBS)		
<b>Focus of EIA<sup>4</sup></b>	<p><b>The following is adapted from an EIA that was drafted in 2020 for the Welfare Support and Financial Assistance (WSFA) Workstream, as part of the Covid 19 response. The contents have gone on to inform similar EIAs, for example concerning Household Support Fund (HSF) phase 1, 2 and 3, Cost of Living Report, review of the Council Tax Reduction Scheme and now has been updated with updated and new data from the Low-Income Family Tracker (LIFT) and revisions to impacts and outcomes to reflect the end of COVID restrictions. This EIA now informs the Household Support Fund 23/24 and Cost of Living Report (Mar 2023).</b></p>		

2. Update on previous EIA and outcomes of previous actions<sup>5</sup>

<b>What actions did you plan last time?</b> (List them from the previous EIA)	<b>What improved as a result?</b> What outcomes have these actions achieved?	<b>What <u>further</u> actions do you need to take?</b> (Add these to the Action plan below)
Not Applicable		

DRAFT

### 3. Review of information, equality analysis and potential actions

Groups to assess	What do you know <sup>6</sup> ? Summary of data about your service-users and/or staff	What do people tell you <sup>7</sup> ? Summary of service-user and/or staff feedback	What does this mean <sup>8</sup> ? Impacts identified from data and feedback (actual and potential)	What can you do <sup>9</sup> ? All potential actions to: • advance equality of opportunity, • eliminate discrimination, and • foster good relations
Age <sup>10</sup>	<p>There is a limited set of current data available on the financial resilience of this characteristic group. Our assessment has mostly been based on face-to-face feedback from residents accessing third sector support and wider reports.</p> <p>‘One in 10 older people are reducing or stopping their social care or expect to do so in the coming months’ as a direct result of CoL’ (Age UK)</p> <p><a href="#">One in ten UK older people are reducing or stopping their social care or expect to do so in the coming months as they struggle with the cost of living   Media   Age UK</a></p> <p>Population changes by age in Brighton and Hove between 2011 – 2021. Data from Census 21:</p>	<ul style="list-style-type: none"> <li>• Cost of Living (CoL) crisis affecting all age groups, but increased fuel costs make older people more vulnerable to unaffordable fuel bills. Older people are on a fixed income and cannot increase this as needed, through work. They may require additional heating, due to health conditions.</li> <li>• Older people can feel vulnerable to infection and are therefore more likely to continue to shield. As such they may be limited in their ability to shop for their essential needs or socialise.</li> <li>• Brighton Youth Advice Centre (YAC) has confirmed a significant rise in</li> </ul>	<ul style="list-style-type: none"> <li>• Older people’s health is more at risk if they cannot afford to heat their homes, eat adequately, or pay for essential medications / social care.</li> <li>• Young people less financially independent because of decrease in employment opportunities. More likely to be on a fixed income.</li> <li>• Households whose working hours or income have changed because of the pandemic have had to adjust to lower incomes, regardless of pre-existing financial</li> </ul>	<ul style="list-style-type: none"> <li>• Ensure easy access to and smooth referrals into the advice sector for those identified as in need of financial support, including council’s own Welfare Support Hub.</li> <li>• Ensuring community organisations representing at-risk groups are funded to provide financial support outside of formal council protocol.</li> <li>• Information to be made clear and accessible for all and for all front-line services to be aware of support available and signpost accordingly.</li> </ul>

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<b>Disability<sup>11</sup></b>	<p>There is a limited set of current data available on the financial resilience of this characteristic group. Our assessment has been based on face-to-face feedback from residents accessing third sector support and wider reports.</p>	<ul style="list-style-type: none"> <li>Disabled people more likely to be limited in their ability to be able to increase their income to afford additional costs, due to their health/disability needs.</li> <li>Disabled people may be more likely to need to keep their homes warm for their health.</li> <li>Disabled people more likely to have</li> </ul>	<ul style="list-style-type: none"> <li>Increased fuel costs due to heating requirements and additional equipment for their accessibility and health needs.</li> <li>Those digitally excluded may not be accessing cheaper deals on the internet</li> <li>Those on a fixed income less likely</li> </ul>	<ul style="list-style-type: none"> <li>Ensure easy access to and smooth referrals into the advice sector for those identified as in need of financial support, including council's own Welfare Support Hub.</li> <li>Ensuring community</li> </ul>																		

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	<p>Source: Department for Work and Pensions Aug-Nov 2022:</p> <table border="1" data-bbox="427 472 943 699"> <tr> <td>PIP Claimants</td> <td>13,008</td> </tr> <tr> <td>Attendance Allowance</td> <td>4,182</td> </tr> <tr> <td>UC – Limited capability for work</td> <td>4,511</td> </tr> <tr> <td>DLA</td> <td>5,981</td> </tr> </table> <p>Data from LDSF applications delivered during Household Support Fund shows 39% of claims came from a household with a Disabled person.</p> <p>Low Income Family Tracker (LIFT) data, available pp25-26, shows that in general households in receipt of Disability benefits are more likely to be in a higher financial resilience category (92%) than a household in receipt of benefits where disability components are not in payment. However, within this disability group, those aged between 50 and 65 have a higher incidence of being in a lower financial resilience category and therefore more likely to need crisis support.</p>	PIP Claimants	13,008	Attendance Allowance	4,182	UC – Limited capability for work	4,511	DLA	5,981	<p>additional requirements for electronic health-related equipment.</p> <ul style="list-style-type: none"> <li>• Disabled people more likely to have more expensive food costs due to specialist dietary needs.</li> <li>• More likely to be continuing to shield due to pre-existing health conditions.</li> <li>• More likely to be digitally excluded.</li> <li>• Negative effect on mental health for disabled people and their families as a direct result of managing rising costs.</li> </ul>	<p>to have savings or financial contingency for increased cost in food and other expenses</p>	<p>organisations representing at-risk groups are funded to provide financial support outside of formal council protocol.</p> <ul style="list-style-type: none"> <li>• Information to be made clear and accessible for all and for all front-line services to be aware of support available and signpost accordingly.</li> <li>• Preventative work by WRBS using LIFT dashboard to identify households who may be struggling with Council Tax debt and</li> </ul>
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	<p>‘Callers to our Disability Energy Support and helpline services are feeling isolated and anxious. 43% of callers are already in energy debt, averaging at £1,351’. (Scope)*</p> <p>As of October 2022, a single disabled adult over the age of 25 on income-based Employment and Support Allowance (ESA) and associated premiums has already seen a cut of up to £687 in real terms. (Scope)*</p> <p>Over half (52%) of disabled people say that increasing costs are negatively affecting their mental health, with a similar number (46%) saying it was also negatively affecting the mental health of their family. 1 in 4 (26%) of disabled people also say that increases to costs are causing arguments in their household (Scope)*</p> <p><a href="#">*Cost of living: the impact for disabled people   Disability charity Scope UK</a></p>			<p>offering early intervention.</p>

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<b>Gender reassignment<sup>12</sup></b>	<p>There is a limited set of current data available on the financial resilience of this characteristic group. Our assessment has been based on face-to-face feedback from residents accessing third sector support and wider reports.</p> <p>‘Cities such as London, Manchester and Brighton are where queer people “are drawn,” thanks to the queer communities there. But these are also the more expensive cities in the UK. “The way the housing system is set up, there’s barriers that come in if you’ve not got local connections, and the restrictions around support you get from the statutory system.”</p> <p><a href="#">How the cost of living crisis is affecting LGBTQ+ people - The Face</a></p>	<ul style="list-style-type: none"> <li>• More likely to be financially disadvantaged or living on a fixed income.</li> <li>• LGBTQ+ people, particularly trans people, tend to be paid substantially less than those outside of the community.</li> <li>• Trans people are more likely to be in precarious employment or housing</li> </ul>	<ul style="list-style-type: none"> <li>• Those on a fixed income less likely to have savings or financial contingency for increased cost in fuel and food expenses</li> <li>• Trans community can have additional costs as part of transition process that they struggle to meet due to cost of food / fuel</li> <li>• Lack of family support network for residents who have come to Brighton to be part of a community.</li> </ul>	<ul style="list-style-type: none"> <li>• Ensure easy access to and smooth referrals into the advice sector for those identified as in need of financial support, including council’s own Welfare Support Hub.</li> <li>• Ensuring community organisations representing at-risk groups are funded to provide financial support outside of formal council protocol.</li> <li>• Information to be made clear and accessible for all and for all front-line services to be aware of support available and signpost accordingly.</li> <li>• Preventative work by WRBS using</li> </ul>

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<b>Pregnancy and maternity<sup>13</sup></b>	There is a limited set of current data available on the financial resilience of this characteristic group. Our assessment has been based on face-to-face feedback from residents accessing third sector support and wider reports.	<ul style="list-style-type: none"> <li>• Already reduced income placed under greater pressure due to CoL</li> </ul>	<ul style="list-style-type: none"> <li>• Reduced income risks deepening or newly establishing debt.</li> <li>• Unable to comfortably adapt to additional costs associated with CoL, i.e., additional meals for the whole family, but specifically children of school age.</li> <li>• Less able to buy in more food to manage isolation and holiday periods, as well as post-natal period when less able to get out.</li> </ul>	<ul style="list-style-type: none"> <li>• Ensuring community organisations representing at-risk groups are funded to provide financial support outside of formal council protocol.</li> <li>• Family Information Service, with links into Children's Centres, Community Midwifery and Health Visiting service, are part of the WSFA board, so issues can be identified and considered strategically across the council.</li> </ul>

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<p><b>Race/ethnicity<sup>14</sup></b> Including migrants, refugees, and asylum seekers</p>	<p>There is a limited set of current data available on the financial resilience of this characteristic group. Our assessment has mostly been based on face-to-face feedback from residents accessing third sector support and wider reports.</p> <p>Source: Census 2011</p>	<ul style="list-style-type: none"> <li>• More likely to be on a low or fixed income or having limited hours of work.</li> <li>• Residents with No Recourse to Public Funds including EU nationals without access to benefits in precarious employment or working in the black economy are already vulnerable to destitution if they lose employment.</li> <li>• Some communities will have specific dietary needs.</li> <li>• BAME households almost twice as likely to be in food poverty in Brighton and Hove according to Money Advice Plus</li> <li>• BMECP report demand so high they have had to prioritise families w/children which increases the risk around BME young people and pensioners (BMECP)</li> <li>• High number of requests for help with rent, 70% of which from residents not on benefits (BMECP)</li> </ul>	<ul style="list-style-type: none"> <li>• Specific dietary needs may be impacted by food shortages or price rises on high demand products</li> <li>• Emergency food support available may not include items specific to dietary needs.</li> <li>• Language and cultural barriers mean some groups may not be aware of support available through grants, additional benefit support or crisis intervention routes (e.g., food banks, Local Discretionary Social Fund (LDSF) etc</li> <li>• No Recourse to Public Funds (NRPF) households may be at particular financial risk if not eligible for all support mechanisms that have been put in place.</li> <li>• Residents with</li> </ul>	<ul style="list-style-type: none"> <li>• Ensuring community organisations representing at-risk groups are funded to provide financial support outside of formal council protocol.</li> <li>• Ensure information about support is accessible to all groups and encourage this information to be distributed through community-based groups. Consider all options of how financial support can be devolved to community-based groups.</li> <li>• Ensure easy access to and smooth referrals into the advice sector for those identified as in need of financial support, including council's own Welfare Support Hub</li> <li>• Information to be made clear and accessible for all,</li> </ul>														
	<table border="1"> <tr> <td>White British</td> <td>220,020</td> </tr> <tr> <td>Non-White</td> <td>29,855</td> </tr> <tr> <td>White Non-British</td> <td>23,495</td> </tr> <tr> <td>Mixed</td> <td>10,410</td> </tr> <tr> <td>Asian</td> <td>11,280</td> </tr> <tr> <td>Black</td> <td>4,190</td> </tr> <tr> <td>Other ethnic group</td> <td>3,985</td> </tr> <tr> <td>Households with multiple ethnicities</td> <td>18,340</td> </tr> <tr> <td>No members of household have English as first language</td> <td>5,925</td> </tr> </table>				White British	220,020	Non-White	29,855	White Non-British	23,495	Mixed	10,410	Asian	11,280	Black	4,190	Other ethnic group	3,985
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Data from LDSF applications delivered during Household Support Fund Oct 2021 – Feb 2023:

Ethnicity	Count	%
Any Other	91	1%
Arab	72	1%
Asian Bangladeshi	29	0%
Asian Indian	12	0%
Asian Other	31	0%
Asian Pakistani	12	0%
Black African	107	1%
Black Caribbean	41	0%
Black Other	25	0%
Chinese	5	0%
Gypsy / Traveller	11	0%
Mixed African	65	1%
Mixed Asian	35	0%
Mixed Caribbean	82	1%
Mixed Other	65	1%
Not Stated	2119	25%
White British	5368	63%
White Irish	43	1%
White Other	317	4%
<b>Total</b>	<b>8530</b>	

insecure immigration status may fear contacting the authorities in case their details are shared with the Home Office.

including translated materials in key languages for the city's migrant populations, and for all front-line services to be aware of support available and signpost accordingly.

- To ensure the needs and eligibility of NRPF households and EU nationals without access to benefits are considered within the allocation of temporary discretionary funds dispersed from central government to support households financially impacted by the CoL crisis. Each scheme deriving from these funds, in addition to all pre-existing discretionary funds administered by the council, should be inclusive by default.

<p><b>Religion or belief<sup>15</sup></b></p>	<p>There is a limited set of current data available on the financial resilience of this characteristic group. Our assessment has mostly been based on face-to-face feedback from residents accessing third sector support and wider reports.</p> <p>Source: Census 2011</p> <table border="1" data-bbox="432 635 795 979"> <tr> <td>Christian</td> <td>117,275</td> </tr> <tr> <td>Buddhist</td> <td>2,740</td> </tr> <tr> <td>Hindu</td> <td>1,790</td> </tr> <tr> <td>Jewish</td> <td>2,670</td> </tr> <tr> <td>Muslim</td> <td>6,095</td> </tr> <tr> <td>Sikh</td> <td>340</td> </tr> <tr> <td>Other</td> <td>2,410</td> </tr> <tr> <td>No religion</td> <td>115,955</td> </tr> </table> <p>Data from LDSF applications delivered during Household Support Fund Oct 2021 – Feb 2023:</p>	Christian	117,275	Buddhist	2,740	Hindu	1,790	Jewish	2,670	Muslim	6,095	Sikh	340	Other	2,410	No religion	115,955	<ul style="list-style-type: none"> <li>Some religious groups will have specific dietary needs</li> </ul>	<ul style="list-style-type: none"> <li>Specific dietary needs may be impacted by food shortages or price rises on high demand products (like rice, for example).</li> <li>Emergency food support available may not include items specific to dietary needs.</li> <li>Language and cultural barriers mean some groups may not be aware of support available through grants, additional benefit support or crisis intervention routes (e.g., food banks, Local Discretionary Social Fund (LDSF) etc</li> </ul>	<ul style="list-style-type: none"> <li>Ensuring community organisations representing at-risk groups are funded to provide financial support outside of formal council protocol.</li> <li>Ensure information about support is accessible to all groups and encourage this information to be distributed through community-based groups. Consider all options of how financial support can be devolved to community-based groups.</li> <li>Ensure easy access to and smooth referrals into the advice sector for those identified as in need of financial support, including council's own Welfare Support Hub.</li> </ul>
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	<table border="1"> <thead> <tr> <th>Religion</th> <th>Count</th> <th>%</th> </tr> </thead> <tbody> <tr> <td>Buddhist</td> <td>44</td> <td>1%</td> </tr> <tr> <td>Christian</td> <td>1171</td> <td>14%</td> </tr> <tr> <td>Hindu</td> <td>6</td> <td>0%</td> </tr> <tr> <td>Jewish</td> <td>15</td> <td>0%</td> </tr> <tr> <td>Muslim</td> <td>215</td> <td>3%</td> </tr> <tr> <td>None</td> <td>2613</td> <td>31%</td> </tr> <tr> <td>Not Stated</td> <td>4170</td> <td>49%</td> </tr> <tr> <td>Other</td> <td>293</td> <td>3%</td> </tr> <tr> <td>Sikh</td> <td>3</td> <td>0%</td> </tr> <tr> <td><b>Total</b></td> <td><b>8530</b></td> <td></td> </tr> </tbody> </table>	Religion	Count	%	Buddhist	44	1%	Christian	1171	14%	Hindu	6	0%	Jewish	15	0%	Muslim	215	3%	None	2613	31%	Not Stated	4170	49%	Other	293	3%	Sikh	3	0%	<b>Total</b>	<b>8530</b>				
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<p><b>Sex/Gender<sup>16</sup></b></p>	<p>There is a limited set of current data available on the financial resilience of this characteristic group. Our assessment has mostly been based on face-to-face feedback from residents accessing third sector support and wider reports.</p> <p>Source: Census 2011</p> <table border="1"> <tbody> <tr> <td>Total Population:</td> <td>290,395</td> </tr> <tr> <td>Female</td> <td>145,778</td> </tr> <tr> <td>Male</td> <td>144,616</td> </tr> </tbody> </table> <p>95% of single parents with an open Housing Benefit claim are women. (Northgate report 15/10/2020)</p> <p>Low Income Family Tracker (LIFT) data, available pp25-26, shows that single parent households (which are more likely to be women) have a</p>	Total Population:	290,395	Female	145,778	Male	144,616	<ul style="list-style-type: none"> <li>• Women are more likely to be working part time, or on a fixed income, than men</li> <li>• Women more likely to be single parents.</li> </ul>	<ul style="list-style-type: none"> <li>• Additional burdens due to the cost of Living could have disproportionate impact on women due to the nature of their employment types and barriers to employment for those with sole childcare responsibilities</li> </ul>	<ul style="list-style-type: none"> <li>• Ensure easy access to and smooth referrals into the advice sector for those identified as in need of financial support, including council's own Welfare Support Hub.</li> <li>• Ensuring community organisations representing at-risk groups are funded to provide financial support outside of formal council protocol.</li> </ul>																											
Total Population:	290,395																																				
Female	145,778																																				
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	higher incidence of being on a low financial resilience category than couples with children. Single parents are therefore more likely to need crisis support than couples with children.			
<b>Sexual orientation</b> <sup>17</sup>	There is a limited set of current data available on the financial resilience of this characteristic group. Our assessment has mostly been based on face-to-face feedback from residents accessing third sector support and wider reports.	No known issues reported to disproportionately affect this group		<ul style="list-style-type: none"> <li>• Ensure easy access to and smooth referrals into the advice sector for those identified as in need of financial support, including council's own Welfare Support Hub.</li> </ul>

<p><b>Marriage and civil partnership<sup>18</sup></b></p>	<p>There is a limited set of current data available on the financial resilience of this characteristic group. Our assessment has mostly been based on face-to-face feedback from residents accessing third sector support and wider reports.</p> <p>Source: Census 2011</p> <table border="1" data-bbox="432 643 808 834"> <tr> <td>Married Households</td> <td>28,335</td> </tr> <tr> <td>Co-Habiting</td> <td>15,430</td> </tr> <tr> <td>Lone Parent</td> <td>8,635</td> </tr> </table>	Married Households	28,335	Co-Habiting	15,430	Lone Parent	8,635	<ul style="list-style-type: none"> <li>• The strain of economic pressures and debt caused by an increase in the cost of living can impact on the relationships of householders and their Mental Health</li> <li>• In incidents of fleeing Domestic Violence the family is often relocated away from their network of family and friends.</li> </ul>	<ul style="list-style-type: none"> <li>• Homelessness places women at a significant financial disadvantage as well as impacting on their mental health and the wellbeing of the family.</li> <li>• Without a network of support, increased expenses may follow due to a loss of informal childcare. Or hours of work may need to be reduced.</li> </ul>	<ul style="list-style-type: none"> <li>• Ensure easy access to and smooth referrals into the advice sector for those identified as in need of financial support, including council's own Welfare Support Hub.</li> <li>• Ensuring community organisations representing at-risk groups are funded to provide financial support outside of formal council protocol.</li> </ul>
Married Households	28,335									
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<p><b>Community Cohesion<sup>19</sup></b></p>	<p>Low Income Family Tracker (LIFT) data, available pp25-26, shows that the financial resilience of households in different wards can vary, with some wards having a higher incidence of households in financial vulnerability than other wards. St Peter's and North Laine and Regency wards are showing as having a higher proportion of households on the lower end of the financial resilience categories</p>		<ul style="list-style-type: none"> <li>• There could be multiple factors that are affecting this affordability representation in central wards. This could include higher rents, a higher representation of one bed flats and studios (single income households), or a higher proportion of hostel and</li> </ul>	<ul style="list-style-type: none"> <li>• Ensure easy access to and smooth referrals into the advice sector for those identified as in need of financial support, including council's own Welfare Support Hub.</li> <li>• Information to be made clear and accessible for all</li> </ul>						

			supported accommodation. More investigation and research needs to be undertaken to better understand this demographic representation.	and for all front-line services to be aware of support available and signpost accordingly.
<b>Other relevant groups<sup>20</sup></b>	<p><b>Carers</b></p> <p>Data from LDSF applications delivered during Household Support Fund Oct 2021 – Feb 2023 shows 6% of claims came from a household in receipt of Carers Allowance.</p> <p>Carers UK research March 2020, '<a href="#">Caring and the Cost of Living crisis</a>' Identified both formal and informal carers were disproportionately at risk by the Cost of Living Crisis.</p>	<ul style="list-style-type: none"> <li>• More likely to be on a limited and fixed income due to caring requirements</li> <li>• More likely to have higher fuel costs due to health or disability requirements of the people they care for.</li> </ul>	<ul style="list-style-type: none"> <li>• Increased fuel costs due to heating requirements and additional equipment for their accessibility and health needs.</li> <li>• Those on a fixed income less likely to have savings or financial contingency for increased cost in food and other expenses</li> </ul>	<ul style="list-style-type: none"> <li>• Ensure easy access to and smooth referrals into the advice sector for those identified as in need of financial support, including council's own Welfare Support Hub.</li> <li>• Information to be made clear and accessible for all and for all front-line services to be aware of support available and signpost accordingly.</li> </ul>
<b>Cumulative impact<sup>21</sup></b>				

## **Assessment of overall impacts and any further recommendations<sup>22</sup>**

While difficult to quantify there will be a cohort of the population with intersecting characteristics that place them at greater vulnerability, for example, disabled women. It will be important for the council and community organisations to take a holistic view of an individual's support needs when providing support and consider signposting/referring to a variety of other support and or when providing the support directly. It is also important in consideration of how, where and through who, that information about support is made available and how it is communicated.

**4. List detailed data and/or community feedback that informed your EIA**

Title (of data, research, or engagement)	Date	Gaps in data	Actions to fill these gaps: who else do you need to engage with? (Add these to the Action Plan below, with a timeframe)
LDSF systems reporting	Ongoing		
ONS data	Ongoing		
Housing Benefit data from Northgate (NEC) system	Ongoing		
LIFT Programme Data	Ongoing		
DWP Data	Ongoing		

**EIA sign-off:**

**Staff member completing Equality Impact Assessment:** Nathan Hoskinson

**Date:** 01/03/2023

**Directorate Management Team rep or Head of Service/Commissioning:** Nigel Manvell

**Date:** 01/03/2023

**CCG or BHCC Equality lead:** Emma McDermott

**Date:** 02/03/2023

## References

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- <sup>1</sup> **Title of EIA:** This should clearly explain what service / policy / strategy / change you are assessing
- <sup>2</sup> **ID no:** The unique reference for this EIA. If in doubt, contact your CCG or BHCC equality lead (see page 1)
- <sup>3</sup> **Team/Department:** Main team responsible for the policy, practice, service or function being assessed
- <sup>4</sup> **Focus of EIA:** A member of the public should have a good understanding of the policy or service and any proposals after reading this section. Please use plain English and write any acronyms in full first time - e.g.: 'Equality Impact Assessment (EIA)'

This section should explain what you are assessing:

- What are the main aims or purpose of the policy, practice, service or function?
- Who implements, carries out or delivers the policy, practice, service or function? Please state where this is more than one person/team/body and where other organisations deliver under procurement or partnership arrangements.
- How does it fit with other services?
- Who is affected by the policy, practice, service or function, or by how it is delivered? Who are the external and internal service-users, groups, or communities?
- What outcomes do you want to achieve, why and for whom? E.g.: what do you want to provide, what changes or improvements, and what should the benefits be?
- What do existing or previous inspections of the policy, practice, service or function tell you?
- What is the reason for the proposal or change (financial, service, legal etc)? The Act requires us to make these clear.

<sup>5</sup> **Previous actions:** If there is no previous EIA or this assessment is of a new service, then simply write 'not applicable'.

<sup>6</sup> **Data:** Make sure you have enough data to inform your EIA.

- What data relevant to the impact on specific groups of the policy/decision/service is available?<sup>6</sup>
- What further evidence is needed and how can you get it? (E.g.: further research or engagement with the affected groups).
- What do you already know about needs, access and outcomes? Focus on each of the groups identified above in turn. E.g.: who uses the service? Who doesn't and why? Are there differences in outcomes? Why?
- Have there been any important demographic changes or trends locally? What might they mean for the service or function?
- Does data/monitoring show that any policies or practices create particular problems or difficulties for any groups?
- Do any equality objectives already exist? What is current performance like against them?
- Is the service having a positive or negative effect on particular people in the community, or particular groups or communities?
- Use local sources of data (e.g.: JSNA: <http://www.bhconnected.org.uk/content/needs-assessments> and Community Insight: <http://brighton-hove.communityinsight.org/#> ) and national ones where they are relevant.

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<sup>7</sup> **Engagement:** You must engage appropriately with those likely to be affected to fulfil the equality duty.

- What do people tell you about the services?
- Are there patterns or differences in what people from different groups tell you?
- What information or data will you need from communities?
- How should people be consulted? Consider:
  - (a) consult when proposals are still at a formative stage;
  - (b) explain what is proposed and why, to allow intelligent consideration and response;
  - (c) allow enough time for consultation;
  - (d) make sure what people tell you is properly considered in the final decision.
- Try to consult in ways that ensure all perspectives can be considered.
- Identify any gaps in who has been consulted and identify ways to address this.

<sup>8</sup> Your EIA must get to grips fully and properly with actual and potential impacts.

- The equality duty does not stop decisions or changes, but means we must conscientiously and deliberately confront the anticipated impacts on people.
- Be realistic: don't exaggerate speculative risks and negative impacts.
- Be detailed and specific so decision-makers have a concrete sense of potential effects. Instead of "the policy is likely to disadvantage older women", say how many or what percentage are likely to be affected, how, and to what extent.
- Questions to ask when assessing impacts depend on the context. Examples:
  - Are one or more groups affected differently and/or disadvantaged? How, and to what extent?
  - Is there evidence of higher/lower uptake among different groups? Which, and to what extent?
  - If there are likely to be different impacts on different groups, is that consistent with the overall objective?
  - If there is negative differential impact, how can you minimise that while taking into account your overall aims
  - Do the effects amount to unlawful discrimination? If so the plan must be modified.
  - Does the proposal advance equality of opportunity and/or foster good relations? If not, could it?

<sup>9</sup> Consider all three aims of the Act: removing barriers, and also identifying positive actions we can take.

- Where you have identified impacts you must state what actions will be taken to remove, reduce or avoid any negative impacts and maximise any positive impacts or advance equality of opportunity.
- Be specific and detailed and explain how far these actions are expected to improve the negative impacts.
- If mitigating measures are contemplated, explain clearly what the measures are, and the extent to which they can be expected to reduce / remove the adverse effects identified.
- An EIA which has attempted to airbrush the facts is an EIA that is vulnerable to challenge.

<sup>10</sup> **Age:** People of all ages

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<sup>11</sup> **Disability:** A person is disabled if they have a physical or mental impairment which has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities. The definition includes: sensory impairments, impairments with fluctuating or recurring effects, progressive, organ specific, developmental, learning difficulties, mental health conditions and mental illnesses, produced by injury to the body or brain. Persons with cancer, multiple sclerosis or HIV infection are all now deemed to be disabled persons from the point of diagnosis.

<sup>12</sup> **Gender Reassignment:** A transgender person is someone who proposes to, starts or has completed a process to change their gender. A person does not need to be under medical supervision to be protected

<sup>13</sup> **Pregnancy and Maternity:** Protection is during pregnancy and any statutory maternity leave to which the woman is entitled.

<sup>14</sup> **Race/Ethnicity:** This includes ethnic or national origins, colour or nationality, and includes refugees and migrants, and Gypsies and Travellers. Refugees and migrants means people whose intention is to stay in the UK for at least twelve months (excluding visitors, short term students or tourists). This definition includes asylum seekers; voluntary and involuntary migrants; people who are undocumented; and the children of migrants, even if they were born in the UK.

<sup>15</sup> **Religion and Belief:** Religion includes any religion with a clear structure and belief system. Belief means any religious or philosophical belief. The Act also covers lack of religion or belief.

<sup>16</sup> **Sex/Gender:** Both men and women are covered under the Act.

<sup>17</sup> **Sexual Orientation:** The Act protects bisexual, gay, heterosexual and lesbian people

<sup>18</sup> **Marriage and Civil Partnership:** Only in relation to due regard to the need to eliminate discrimination.

<sup>19</sup> **Community Cohesion:** What must happen in all communities to enable different groups of people to get on well together.

<sup>20</sup> **Other relevant groups:** e.g.: Carers, people experiencing domestic and/or sexual violence, substance misusers, homeless people, looked after children, ex-armed forces personnel, people on the Autistic spectrum etc

<sup>21</sup> **Cumulative Impact:** This is an impact that appears when you consider services or activities together. A change or activity in one area may create an impact somewhere else

<sup>22</sup> **Assessment of overall impacts and any further recommendations**

- Make a frank and realistic assessment of the overall extent to which the negative impacts can be reduced or avoided by the mitigating measures. Explain what positive impacts will result from the actions and how you can make the most of these.

- 
- Countervailing considerations: These may include the reasons behind the formulation of the policy, the benefits it is expected to deliver, budget reductions, the need to avert a graver crisis by introducing a policy now and not later, and so on. The weight of these factors in favour of implementing the policy must then be measured against the weight of any evidence as to the potential negative equality impacts of the policy.
  - Are there any further recommendations? Is further engagement needed? Is more research or monitoring needed? Does there need to be a change in the proposal itself?

Data taking from Low Income Family Tracker (LIFT), using our January 2023 data set (most recent refresh), representing available equalities groups by their financial resilience status.

Ward	Coping	%	At Risk	%	Struggling	%	In Crisis	%
Brunswick and Adelaide	572	79%	95	13%	35	5%	19	3%
Central Hove	612	84%	76	10%	27	4%	12	2%
East Brighton	1,904	88%	161	7%	73	3%	27	1%
Goldsmid	945	86%	108	10%	37	3%	12	1%
Hangleton and Knoll	1,203	89%	101	7%	37	3%	11	1%
Hanover and Elm Grove	911	85%	114	11%	35	3%	13	1%
Hollingdean and Stanmer	1,293	87%	137	9%	47	3%	8	1%
Hove Park	202	86%	21	9%	8	3%	3	1%
Moulsecoomb and Bevendean	1,293	90%	90	6%	57	4%	4	0%
North Portslade	710	90%	51	6%	20	3%	8	1%
Other wards	84	47%	72	40%	4	2%	18	10%
Patcham	648	90%	45	6%	17	2%	7	1%
Preston Park	569	81%	96	14%	29	4%	12	2%
Queen's Park	2,638	80%	456	14%	139	4%	61	2%
Regency	604	77%	92	12%	57	7%	30	4%
Rottingdean Coastal	551	88%	51	8%	15	2%	12	2%
South Portslade	816	90%	67	7%	20	2%	7	1%
St. Peter's and North Laine	1,180	81%	190	13%	64	4%	30	2%
Westbourne	587	85%	63	9%	25	4%	12	2%
Wish	579	88%	56	9%	17	3%	4	1%
Withdean	478	85%	57	10%	16	3%	9	2%
Woodingdean	562	88%	57	9%	14	2%	3	0%
<b>Grand Total</b>	<b>18,941</b>	<b>85%</b>	<b>2,256</b>	<b>10%</b>	<b>793</b>	<b>4%</b>	<b>322</b>	<b>1%</b>

Age:

Financial Risk	100+	16-17	18-21	22-24	25-29	30-34	35-39	40-44	45-49	50-54	55-59	60-64	65-69	70-74	75-79	80-84	85-89	90-94	95-99	Grand Total	%
At risk			89	113	166	184	200	242	261	309	320	253	96	9	2	11			1	2,256	10.11%
Coping	17	5	96	234	748	1,151	1,355	1,522	1,485	1,807	1,820	1,538	1,597	1,772	1,589	1,061	715	345	84	18,941	84.89%
In crisis			32	15	38	37	31	30	39	33	37	15	12	1	2					322	1.44%
Struggling		1	33	40	37	36	52	70	102	124	129	118	38	4	4	5				793	3.55%
<b>Grand Total</b>	<b>17</b>	<b>6</b>	<b>250</b>	<b>402</b>	<b>989</b>	<b>1,408</b>	<b>1,638</b>	<b>1,864</b>	<b>1,887</b>	<b>2,273</b>	<b>2,306</b>	<b>1,924</b>	<b>1,743</b>	<b>1,786</b>	<b>1,597</b>	<b>1,077</b>	<b>715</b>	<b>345</b>	<b>85</b>	<b>22,312</b>	<b>100%</b>

Disability (by age):

Financial Risk	100+	18-21	22-24	25-29	30-34	35-39	40-44	45-49	50-54	55-59	60-64	65-69	70-74	75-79	80-84	85-89	90-94	95-99	Grand Total	%
At risk		24	32	29	52	45	52	54	86	94	85	39	3		5				600	5.49%
Coping	15	25	60	278	477	576	693	835	1,172	1,295	1,211	954	752	608	453	362	185	58	10,009	91.65%
In crisis		1		2	1	2		2	5	2	1	1							17	0.16%
Struggling		2	6	5	5	16	18	38	49	68	67	16		2	3				295	2.70%
<b>Grand Total</b>	<b>15</b>	<b>52</b>	<b>98</b>	<b>314</b>	<b>535</b>	<b>639</b>	<b>763</b>	<b>929</b>	<b>1,312</b>	<b>1,459</b>	<b>1,364</b>	<b>1,010</b>	<b>755</b>	<b>610</b>	<b>461</b>	<b>362</b>	<b>185</b>	<b>58</b>	<b>10,921</b>	<b>100%</b>

Single Parents (by age):

Financial Risk	16-17	18-21	22-24	25-29	30-34	35-39	40-44	45-49	50-54	55-59	60-64	65-69	70-74	75-79	Grand Total	%
At risk		5	11	34	43	38	43	33	21	12					240	6.91%
Coping	1	33	87	323	526	601	585	411	319	124	41	14	12	3	3,080	88.68%
In crisis		3	2	8	7	4	6	4	3	2					39	1.12%
Struggling		11	10	9	12	20	17	19	7	7	2				114	3.28%
<b>Grand Total</b>	<b>1</b>	<b>52</b>	<b>110</b>	<b>374</b>	<b>588</b>	<b>663</b>	<b>651</b>	<b>467</b>	<b>350</b>	<b>145</b>	<b>43</b>	<b>14</b>	<b>12</b>	<b>3</b>	<b>3,473</b>	<b>100%</b>

Couples with Children (by age):

Financial Risk	18-21	22-24	25-29	30-34	35-39	40-44	45-49	50-54	55-59	60-64	65-69	70-74	75-79	Grand Total	%
At risk	6	3	4	7	10	12	9	7	2	2	5			67	5.53%
Coping	3	21	63	144	206	231	171	145	71	33	11	4	1	1,104	91.16%
In crisis			3	1	1		2	1						8	0.66%
Struggling	2	1	3	4	5	5	3	7	2					32	2.64%
<b>Grand Total</b>	<b>11</b>	<b>25</b>	<b>73</b>	<b>156</b>	<b>222</b>	<b>248</b>	<b>185</b>	<b>160</b>	<b>75</b>	<b>35</b>	<b>16</b>	<b>4</b>	<b>1</b>	<b>1,211</b>	<b>100%</b>