

General Equality Impact Assessment (EIA) Form

Support:

An [EIA toolkit](#), [workshop content](#), and guidance for completing an [Equality Impact Assessment \(EIA\) form](#) are available on the [EIA page](#) of the [EDI Internal Hub](#). Please read these before completing this form.

For enquiries and further support if the toolkit and guidance do not answer your questions, contact your Equality, Diversity, and Inclusion (EDI) Business Partner as follows:

- Economy, Environment and Culture (EEC) – [Chris Brown](#),
- Families, Children, and Learning (FCL) – [Jamarl Billy](#),
- Governance, People, and Resources (GPR) – [Eric Page](#).
- Health and Adult Social Care (HASC) – [Zofia Danin](#),
- Housing, Neighbourhoods, and Communities (HNC) – [Jamarl Billy](#)

Processing Time:

- EIAs can take up to 10 business days to approve after a completed EIA of a good standard is submitted to the EDI Business Partner. This is not considering unknown and unplanned impacts of capacity, resource constraints, and work pressures on the EDI team at the time your EIA is submitted.
- If your request is urgent, we can explore support exceptionally on request.
- We encourage improved planning and thinking around EIAs to avoid urgent turnarounds as these make EIAs riskier, limiting, and blind spots may remain unaddressed for the 'activity' you are assessing.

Process:

- Once fully completed, submit your EIA to your EDI Business Partner, copying in your Head of Service, Business Improvement Manager (if one exists in your directorate), Equalities inbox, and any other relevant service colleagues to enable EIA communication, tracking and saving.
- When your EIA is reviewed, discussed, and then approved, the EDI Business Partner will assign a reference to it and send the approved EIA form back to you with the EDI Manager or Head of Communities, Equality, and Third Sector (CETS) Service's approval as appropriate.
- Only approved EIAs are to be attached to Committee reports. Unapproved EIAs are invalid.

1. Assessment details

Throughout this form, 'activity' is used to refer to many different types of proposals being assessed.

Read the [EIA toolkit](#) for more information.

Name of activity or proposal being assessed:	Crisis and Resilience Fund
Directorate:	Governance, People and Resources (GPR)
Service:	Welfare, Revenues and Business Support (WRBS)

Team:	Welfare Support
Is this a new or existing activity?	Continuation of an existing activity, with some changes
Are there related EIAs that could help inform this EIA? Yes or No (If Yes, please use this to inform this assessment)	Yes, previous EIA's for Cabinet and Committee reports dealing with the Fairness Fund and Household Support Fund

2. Contributors to the assessment (Name and Job title)

Responsible Lead Officer:	Paul Ross-Dale and Tabitha Cork (Welfare Revenues & Business Support Managers)
Accountable Manager:	Lynsay Cook, Head of Service
Additional stakeholders collaborating or contributing to this assessment:	EDI Business Partner

3. About the activity

Briefly describe the purpose of the activity being assessed:

Allocation of £3.98m Crisis and Resilience Fund for the purposes of welfare support in the city.

What are the desired outcomes of the activity?

An effective and equitable distribution of support, linking crisis response to long-term solutions where possible, across the areas of emergency food, fuel poverty, community organisations helping those in need, and households experiencing extreme financial vulnerability. The outcomes are set out in the government's CRF guidance, falling into four categories:

- Crisis Payments
- Housing Payments
- Resilience (eg financial resilience and reduction of poverty / reliance on food support)
- Community Co-Ordination (which refers more to the infrastructure of support networks and how they connect to one another)

Which key groups of people do you think are likely to be affected by the activity?

A broad range of households and communities with different backgrounds, from across the city. Poverty and financial vulnerability tends to impact those with protected characteristics and minoritised identities or lived experiences more strongly.

4. Consultation and engagement

What consultations or engagement activities have already happened that you can use to inform this assessment?

- For example, relevant stakeholders, groups, people from within the council and externally consulted and engaged on this assessment. **If no consultation** has been done or it is not enough or in process – state this and describe your plans to address any gaps.

We have a regular dialogue with the voluntary sector and other council services, via the Welfare Support and Financial Assistance meetings, the Fuel Poverty and Affordable Warmth Steering Group, the Food Insecurity Group and other adhoc meetings through the year. The Council's Poverty Reduction Steering Group has oversight for welfare support and poverty reduction. Due to this network, we have extensive experience and knowledge of the impact of Household Support Fund (which preceded CRF) and the levels of demand in the city as far as crisis response is concerned.

5. Current data and impact monitoring

Do you currently collect and analyse the following data to enable monitoring of the impact of this activity? Consider all possible intersections.

(State Yes, No, Not Applicable as appropriate):

Age	Partial
Disability and inclusive adjustments, coverage under equality act and not	Partial
Ethnicity, 'Race', ethnic heritage (including Gypsy, Roma, Travellers)	Partial
Religion, Belief, Spirituality, Faith, or Atheism	Partial
Gender Identity and Sex (including non-binary and Intersex people)	Partial
Gender Reassignment	Partial
Sexual Orientation	Partial
Marriage and Civil Partnership	No
Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum)	No
Armed Forces Personnel, their families, and Veterans	Partial
Expatriates, Migrants, Asylum Seekers, and Refugees	No
Carers	Partial
Looked after children, Care Leavers, Care and fostering experienced people	Partial
Domestic and/or Sexual Abuse and Violence Survivors, and people in vulnerable situations (All aspects and intersections)	No
Socio-economic Disadvantage	Partial
Homelessness and associated risk and vulnerability	Partial
Human Rights	No

Additional relevant groups that may be widely disadvantaged and have intersecting experiences that create exclusion and systemic barriers may include:

- Ex-offenders and people with unrelated convictions
- Lone parents
- People experiencing homelessness
- People facing literacy and numeracy barriers
- People on a low income and people living in the most deprived areas
- People who have experienced female genital mutilation (FGM)
- People who have experienced human trafficking or modern slavery
- People with experience of or living with addiction and/ or a substance use disorder (SUD)
- Sex workers

If you answered “NO” to any of the above, how will you gather this data to enable improved monitoring of impact for this activity?

The allocations of the fund bridge multiple organisations of varying size. Many of them are not resourced to collect and monitor data to the level that we would be able to conduct any detailed analysis. We do have some data about some of the protected characteristics for our awards from the Local Discretionary Social Fund (LDSF). We also have regular opportunities for soft input from all of our partner organisations, which helps to inform the future design of our welfare response. Under the CRF guidance, there are stronger requirements for data collection, although this may not directly correlate to protected characteristics. As part of the overall evolution of the welfare service to adapt to CRF, we will look at options for increasing our datasets, including whether the introduction of surveys for service users is feasible.

What are the arrangements you and your service have for monitoring, and reviewing the impact of this activity?

The range of activities is so broad that there is no easy way to monitor the impacts of the activity. There is a broadly ameliorative effect across all of the protected characteristics because the activities are about providing financial and wellbeing support to those who ask for help.

6. Impacts

Advisory Note:

- **Impact:**
 - Assessing disproportionate impact means understanding potential negative impact (that may cause direct or indirect discrimination), and then assessing the relevance (that is: the potential effect of your activity on people with protected characteristics) and proportionality (that is: how strong the effect is).
 - These impacts should be identified in the EIA and then re-visited regularly as you review the EIA every 12 to 18 months as applicable to the duration of your activity.
- **SMART Actions mean:** Actions that are (SMART = Specific, Measurable, Achievable, Realistic, T = Time-bound)
- **Cumulative Assessment:** If there is impact on all groups equally, complete **only** the cumulative assessment section.
- **Data analysis and Insights:**

- In each protected characteristic or group, in answer to the question ‘If “YES”, what are the positive and negative disproportionate impacts?’, describe what you have learnt from your data analysis about disproportionate impacts, stating relevant insights and data sources.
- Find and use contextual and wide ranges of data analysis (including community feedback) to describe what the disproportionate positive and negative impacts are on different, and intersecting populations impacted by your activity, especially considering for [Health inequalities](#), review guidance and inter-related impacts, and the impact of various identities.
- For example: If you are doing road works or closures in a particular street or ward – look at a variety of data and do so from various protected characteristic lenses. Understand and analyse what that means for your project and its impact on different types of people, residents, family types and so on. State your understanding of impact in both effect of impact and strength of that effect on those impacted.
- **Data Sources:**
 - **Consider a wide range (including but not limited to):**
 - [Population and population groups](#)
 - [Census 2021 population groups Infogram: Brighton & Hove by Brighton and Hove City Council](#)
 - [Census](#) and [local intelligence data](#)
 - Service specific data
 - Community consultations
 - Insights from customer feedback including complaints and survey results
 - Lived experiences and qualitative data
 - [Joint Strategic Needs Assessment \(JSNA\) data](#)
 - [Health Inequalities data](#)
 - Good practice research
 - National data and reports relevant to the service
 - Workforce, leaver, and recruitment data, surveys, insights
 - Feedback from internal ‘staff as residents’ consultations
 - Insights, gaps, and data analyses on intersectionality, accessibility, sustainability requirements, and impacts.
 - Insights, gaps, and data analyses on ‘who’ the most intersectionally marginalised and excluded under-represented people and communities are in the context of this EIA.

Learn more about the [Equality Act 2010](#) and about our [Public Sector Equality Duty](#)

6.1 Age

<p>Does your analysis indicate a disproportionate impact relating to any particular Age group? For example: those under 16, young adults, with other intersections.</p>	<p>YES</p>
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

<p><u>Older people:</u></p> <ul style="list-style-type: none"> ● 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.
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- Older people with health problems are more likely to be housebound. As such they may be limited in their ability to shop for their essential needs or socialise.
- Older people more likely to have additional requirements for electronic health-related equipment, thus increasing costs
- Older people more likely to have more expensive food costs due to specialist dietary needs.
- 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.
- Census figures show rise in population figures for age group 50+ (55 to 59 almost doubled since 2011)

Young people

- Brighton Youth Advice Centre (YAC) has confirmed a significant rise in young people under 25 presenting to them as struggling to manage their finances, despite not being eligible for means-tested benefits.
- Young people unable to budget for costs of applying for better jobs or providing for themselves and/or children in the future, which can cause financial stress / anxiety.
- Children at risk of insufficient or inadequate diets during school holidays, due to additional financial strains on the household, if school holiday vouchers are not provided.
- Young people less financially independent because of decrease in employment opportunities. More likely to be on a fixed income.
- The cost-of-living crisis has squeezed essential household income meaning those affected have had to adjust to lower income relative to inflation and other pressures
- Due to the rising costs of day-to-day essentials such as food and fuel, it is more difficult to manage on lower or fixed incomes.
- CRF will continue funding general and Housing advice for young people in YAC, that would otherwise have been cut. CRF will therefore prevent a disproportionate impact on young people.
- Young people engage more effectively with support provided by YAC than with formal statutory bodies
- The council's Corporate Parenting responsibility provides a duty towards children leaving care. An allocation of funding has been made to the Leaving Care team in recent HSF rounds and this will continue under CRF

6.2 Disability:

Does your analysis indicate a disproportionate impact relating to Disability , considering our anticipatory duty ?	YES
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If "YES", what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

In the context of distributing funds for help, the issues concerned might be around the fair distribution and adequate coverage of assistance.

The following factors may be an issue for some Disabled people:

- Limited opportunity to increase their income to afford additional costs arising from their health/disability needs.
- The need to keep homes warm or properly ventilated for health reasons.
- Additional requirements for electronic health-related equipment.
- More likely to have more expensive food costs due to specialist dietary needs.
- The possibility of being housebound and/or experiencing social isolation

- May not have access to the shops or be able to shop widely for competitive prices.
- More likely to be digitally excluded and may not be able to access cheaper deals online.
- Negative effect on pre-existing mental illness as a direct result of managing rising costs.
- Those on a fixed income less likely to have savings or financial contingency for increased cost in food and other expenses.
- Neurodiverse people may not be able to request help or recognise the need for help in the same way as Neurotypical people.
- Our datasets in Housing Benefits, Council Tax and LDSF are very limited, even where the option is provided for clients to give information relating to protected characteristics. It is therefore not possible to draw meaningful conclusions from that data alone.
- High intersection of disabled people within the city's socially deprived areas.

What [inclusive adjustments](#) are you making for diverse disabled people impacted? For example: D/deaf, deafened, hard of hearing, blind, neurodivergent people, those with non-visible disabilities, and with access requirements that may not identify as disabled or meet the legal definition of disability, and have various intersections (Black and disabled, LGBTQIA+ and disabled).

The Crisis Payments team will be accessible via phone or email contact and support can be given by staff on the team to make applications for crisis support. The CRF is distributed through a wide range of third sector partners, with consideration to organisations who already have an established support route for those with protected characteristics

6.3 Ethnicity, 'Race', ethnic heritage (including Gypsy, Roma, Travellers):

Does your analysis indicate a disproportionate impact relating to ethnicity?	YES
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If "YES", what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

- More likely to be on a low or fixed income or having limited or variable hours of work.
- 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.
- Some communities will have specific dietary needs.
- Black and Racially Minoritised households almost twice as likely to be in food poverty in Brighton and Hove according to Money Advice Plus
- BMECP previously reported demand so high they have had to prioritise families with children which increases the risk around BME young people and pensioners (BMECP)
- High number of requests for help with rent, 70% of which from residents not on benefits (BMECP)
- Specific dietary needs may be impacted by food shortages or price rises on high demand products.
- Emergency food support available may not include items specific to dietary needs.
- 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.
- Our datasets in Housing Benefits, Council Tax and LDSF are very limited, even where the option is provided for clients to give information relating to protected characteristics. It is therefore not possible to draw meaningful conclusions from that data alone.

6.4 Religion, Belief, Spirituality, Faith, or Atheism:

Does your analysis indicate a disproportionate impact relating to Religion, Belief, Spirituality, Faith, or Atheism?	YES
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

<ul style="list-style-type: none"> • Specific dietary needs can involve higher cost points as there is less availability. • Emergency food support available may not include items specific to dietary needs. Council’s new Food Strategy Action Plan notes the need for training to be provided to the city’s emergency food providers around culturally specific dietary requirements. • 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. • Using community partners to help deliver CRF means that some groups can be supported by organisations from within their own communities, where language barriers may be overcome and information can be shared by word of mouth. If CRF was only delivered through the council, this would provide a greater disadvantage to non-English speaking households. • CRF funding for organisations means that there is a greater opportunity for communities to come together and gain mutual support • Provision to faith-based organisations may mean that some people feel excluded if they are not part of the same faith group. However, there is a very broad provision among our delivery partners, most of whom are not faith-based. • Our datasets in Housing Benefits, Council Tax and LDSF are very limited, even where the option is provided for clients to give information relating to protected characteristics. It is therefore not possible to draw meaningful conclusions from that data alone.

6.5 Gender Identity and Sex:

Does your analysis indicate a disproportionate impact relating to Gender Identity and Sex (including non-binary and intersex people)?	YES
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

<ul style="list-style-type: none"> • Women are more likely to be working part time, or on a fixed income, than men and generally on lower comparative pay or experiencing pay gaps. • 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. • Single parents are more commonly women and are therefore also more likely to be subject to the Benefit Cap than men, which limits their welfare benefit income. With the sole burden of childcare requirements and lack of opportunities for work that couples may have, women are disproportionately affected under welfare benefit restrictions such as the Benefit Cap and the ‘Two Child Limit’ and therefore more likely to be living in financial hardship.
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- Women with mental health problems are more likely to be financially burdened than men with mental health problems [Through-the-lens_Gender-money-and-mental-health.pdf](#)
- Women, genderqueer and non-binary people can face additional financial costs, such as for period products

6.6 Gender Reassignment:

Does your analysis indicate a disproportionate impact relating to Gender Reassignment ?	YES
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

- More likely to be financially disadvantaged or living on a fixed income.
- LGBTQ+ people, particularly trans people, tend to be paid substantially less than those outside of the community.
- Trans people are more likely to be in precarious employment or housing.
- Those on a fixed income less likely to have savings or financial contingency for increased cost in fuel and food expenses.
- Trans community can have additional costs as part of transition process that they struggle to meet due to cost of food / fuel.
- Lack of family support network for residents who have come to Brighton to be part of a community.
- Trans people are more likely to be further excluded or impacted due to intersections with Racialised and ethnic backgrounds, migrant/ refugee/ asylum seeker experiences, and disability.
- Mental health is a significant issue for the trans community, which can have intersections with income security and debt.

Organisations supporting LGBTQ+ community are increasingly at risk due to reduced funding.

6.7 Sexual Orientation:

Does your analysis indicate a disproportionate impact relating to Sexual Orientation ?	YES
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

- Intersection of LGBTQ+ issues with young people who gravitate to the city or remain in the city after higher education for community reasons, which can then lead to financial vulnerability. For example, due to high housing costs locally.
- Possible lack of family support network.
- QTIPOC barriers unknown in detail, including intersections with disabilities, neurodivergence, autism.

6.8 Marriage and Civil Partnership:

Does your analysis indicate a disproportionate impact relating to Marriage and Civil Partnership?	YES
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

<ul style="list-style-type: none"> • 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. • In incidents of fleeing Domestic Violence the family is often relocated away from their network of family and friends. • Single parents can have less ability to increase their earned income and may be disproportionately impacted by welfare restrictions such as the Benefit Cap and the Two Child Limit. • Single and same sex households with other intersections such as Black and Racially Minoritised, migrant, women-only, disabled households and QTPOC and trans and non-binary households may likely be experiencing additional strains due to Cost of Living increases and pay gaps as well as social deprivation and other impacts.
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6.9 Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum):

Does your analysis indicate a disproportionate impact relating to Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum)?	YES
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

<ul style="list-style-type: none"> • Already reduced income placed under greater pressure due to cost-of-living (CoL). • Reduced income risks deepening or newly establishing debt. • Unable to comfortably adapt to additional costs associated with CoL, i.e., pressure on household budget impacts ability to buy baby food and other essentials. • Less able to buy in more food to manage holiday periods if there is no provision for vouchers in the school holidays, as well as post-natal period when less able to get out. • Our awareness of intersectional impacts due to different identities and layers of barriers is limited.
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6.10 Armed Forces Personnel, their families, and Veterans:

Does your analysis indicate a disproportionate impact relating to Armed Forces Members and Veterans?	YES
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Veterans and forces families can face significant intersecting vulnerabilities: PTSD and complex mental health needs affecting financial management, difficulty navigating civilian welfare systems, housing instability especially for younger veterans, and cultural barriers to seeking help.

BHCC has recently re-signed the Armed Forces Covenant. When the detailed funding distribution is made, officers will check to ensure that there is a route for veterans to access support (for example, signposting routes for RBLI, SSAFA, or local veteran hubs)

6.11 Expatriates, Migrants, Asylum Seekers, and Refugees:

Does your analysis indicate a disproportionate impact relating to Expatriates, Migrants, Asylum seekers, Refugees, those New to the UK, and UK visa or assigned legal status? (Especially considering for age, ethnicity, language, and various intersections)	YES
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

- 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.
- Residents with insecure immigration status may fear contacting the authorities in case their details are shared with the Home Office.
- CRF is one of the few resources available to help people with NRPF.
- Voices in Exile, for example, receive funding to assist clients directly and no personal data is shared with statutory authorities without consent
- Intersections with disability, being Black and Racially Minoritised, belonging to minoritised faiths and religions, being trans, , non-binary and intersex (TNBI), having caring responsibilities and domestic violence exposure/ lived experience can be further impacts due to increasing cost of living pressures.

6.12 Carers:

Does your analysis indicate a disproportionate impact relating to Carers (Especially considering for age, ethnicity, language, and various intersections).	YES
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

- More likely to be on a limited and fixed income due to caring requirements.
- More likely to have higher fuel costs due to health or disability requirements of the people they care for.

- Those on a fixed income less likely to have savings or financial contingency for increased cost in food and other expenses.
- Depending on intersections with other communities of identity, access and awareness of funds and support may be lacking e.g. those from Transgender, Non-Binary and Intersex (TNBI) backgrounds, some disabled people from non-White non-English non-UK backgrounds, migrants.

6.13 Looked after children, Care Leavers, Care and fostering experienced people:

<p>Does your analysis indicate a disproportionate impact relating to Looked after children, Care Leavers, Care and fostering experienced children and adults (Especially considering for age, ethnicity, language, and various intersections).</p> <p>Also consider our Corporate Parenting Responsibility in connection to your activity.</p>	<p>YES</p>
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Financial Independence at a Young Age: Care leavers are expected to be financially independent from the age of 18, unlike their peers who often remain financially supported by their families until their mid-20s. This abrupt transition can lead to financial instability and hardship.

Limited Access to Higher Education: Many care-experienced individuals face barriers to higher education, which can limit their career opportunities and earning potential. For example, those in residential care have a significantly lower chance of achieving higher educational qualifications compared to those in parental care

Employment Challenges: Care leavers often struggle to find stable employment due to a lack of qualifications, work experience, and support networks. This can result in lower income and job insecurity

Cost of Living Pressures: The cost of living crisis disproportionately affects care leavers, who may not have the financial safety net that others do. They are more vulnerable to financial shocks and may struggle to afford basic necessities

Health Inequalities: Poor health outcomes among care-experienced individuals can lead to increased medical expenses and reduced earning capacity. They are more likely to suffer from mental health issues and chronic illnesses, which can further exacerbate financial difficulties

6.14 Homelessness:

<p>Does your analysis indicate a disproportionate impact relating to people experiencing homelessness, and associated risk and vulnerability? (Especially considering for age, veteran, ethnicity, language, and various intersections)</p>	<p>YES</p>
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Many clients accessing crisis support will be at risk of homelessness.

- Homelessness places women at a significant financial disadvantage as well as impacting on their mental health and the wellbeing of the family.
- Limited or no access to support from family and friends
- 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.
- More expenses associated with being relocated further away from schools and GP surgeries.
- More likely to be susceptible to infection and other health concerns from lack of shelter and warmth.
- More likely to have poor nutrition which will impact on a person's health and wellbeing.
- Less able to access support services, including benefits and bank accounts.

6.15 Domestic and/or Sexual Abuse and Violence Survivors, people in vulnerable situations:

Does your analysis indicate a disproportionate impact relating to Domestic Abuse and Violence Survivors, and people in vulnerable situations (All aspects and intersections)?	YES
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

In incidents of fleeing Domestic Violence the family is often relocated away from their network of family and friends

Those fleeing or living with Domestic Abuse may be less able to maintain employment and therefore a regular income.

Those living with Domestic Abuse may be subject to financial control or abuse. This may be more challenging for those with TNBI, disabled, some faiths, Black and Racially Minoritised and Migrant/ refugee/ asylum seeker lived experiences.

6.16 Socio-economic Disadvantage:

Does your analysis indicate a disproportionate impact relating to Socio-economic Disadvantage? (Especially considering for age, disability, D/deaf/ blind, ethnicity, expatriate background, and various intersections)	YES
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

The nature of the CRF is to mitigate socio-economic disadvantage.

Support for grass-roots and community based organisations strengthens local support networks for people with protected characteristics and has a positive impact on creation of access and equity. This is particularly the case for disabled, D/deaf/deafened, blind, migrant/ refugee/ asylum seeker, QTIPOC, TNBI and Black and Racially Minoritised communities. There is also consideration of an appropriate geographical reach to allow access for all disadvantaged communities.

The threshold for Free School Meals eligibility is proportionately high, compared to some other forms of welfare support and the eligibility pool is set to double with a rule change coming in September 2026. However, one big change in CRF is that there can no longer be blanket provision of Free School Meal vouchers in the school holidays. Those who are entitled to Free School Meals will be on Universal Credit, but this does not necessarily mean that every household on UC is experiencing acute crisis. However, it is clear that removing FSM in the holidays will impact low income households. CRF support is distributed broadly via multiple council services and third sector organisations. There is no restriction on the number of times a household can access support through multiple avenues. Therefore the impact from this specific funding reduction is mitigated by their ability to access further support if necessary. A communication plan is being drawn up to ensure that families with the most need are aware of avenues of assistance, and that those areas with highest FSM eligibility rates will be signposted to the new programmes.

Additionally the programme for CRF includes increased staffing at the Best Start Family Hubs, and additional funding for Holidays Activities and Food programmes, so that providers can now operate during half terms. The national picture for child poverty has also been ameliorated by a number of government measures, including the expansion of Breakfast Clubs, the aforementioned expansion of FSM eligibility, and the removal of the two-child benefit limit. The government's combined measures are intended to lift 400,000 children out of child poverty.

It is recognised that the populations identified by this EIA may struggle disproportionately to manage a multi-step process to find equivalent support. This is why one of the mitigations includes increasing the resource at Best Start Family Hubs to assist clients. The standard process of providing crisis funding to our partnership organisations means that they are supported to support their clients.

6.17 Human Rights:

Will your activity have a disproportionate impact relating to Human Rights?	YES
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If "YES", what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

The following articles are relevant to populations covered elsewhere in this EIA

Article 8 (private and family life), Article 3 (freedom from inhuman or degrading treatment -relevant to destitution), and Article 6 (fair access to processes) rights are live and relevant.

The design of the fund is intended to improve the situation for households and therefore lessen any impact on their Human Rights. None of the measures outlined in the CRF distribution proposals would have a negative impact on Human Rights.

6.18 Cumulative, multiple [intersectional](#), and complex impacts (including on additional relevant groups):

What cumulative or complex impacts might the activity have on people who are members of multiple Minoritised groups?

- For example: people belonging to the Gypsy, Roma, and/or Traveller community who are also disabled, LGBTQIA+, older disabled trans and non-binary people, older Black and Racially Minoritised disabled people of faith, young autistic people.
- Also consider wider disadvantaged and intersecting experiences that create exclusion and systemic barriers:
 - People experiencing homelessness
 - People on a low income and people living in the most deprived areas
 - People facing literacy and numeracy barriers
 - Lone parents
 - People with experience of or living with addiction and/ or a substance use disorder (SUD)
 - Sex workers
 - Ex-offenders and people with unrelated convictions
 - People who have experienced female genital mutilation (FGM)
 - People who have experienced human trafficking or modern slavery

There is a strong degree of intersectionality across all protected characteristics when it comes to poverty, debt and the impact of the Cost-of-Living Crisis. Many of our vulnerable households will also face barriers of accessibility around technology, including digital literacy and availability of tablets, smart phones, and data to access online services. The multidoor approach through third sector organisations and the council's customer service centres and libraries means that the impact is mitigated. Literacy and numeracy issues impact on employability, and this has a direct impact on the ability for households to lift themselves out of poverty. An example of this is when benefit households are benefit-capped, but cannot easily access employment to become exempt from the cap.

7. Action planning

What SMART actions will be taken to address the disproportionate and cumulative impacts you have identified?

- Summarise relevant SMART actions from your data insights and disproportionate impacts below for this assessment, listing appropriate activities per action as bullets. (This will help your Business Manager or Fair and Inclusive Action Plan (FIAP) Service representative to add these to the Directorate FIAP, discuss success measures and timelines with you, and monitor this EIA's progress as part of quarterly and regular internal and external auditing and monitoring)

1. Ensure that referral pathways are clear for all clients, channelling them to appropriate help, and making inclusive and compassionate adjustments in keeping with the Accessible City and Anti-Racism strategies wherever possible.
2. Review training plan and availability of awareness resources for staff regarding protected characteristics and proactively develop understanding around intersectionality, diverse lived experiences and any other areas that may be a knowledge gap.
3. Broad distribution of financial support to organisations in the voluntary sector. <ul style="list-style-type: none"> • Support for food and essentials will go to 60+ organisations, including those focussed on protected characteristics and specialists such as Voices in Exile
4. Practice being a listening council through proactive practice and engagement. <ul style="list-style-type: none"> • Regular meetings involving the Voluntary and Community Sector (for example Welfare Support and Financial Assistance meeting/ Fuel and Affordable Warmth Steering Group) to hear the latest impacts of Cost of Living on specific client groups.

<ul style="list-style-type: none"> • Ensure representation of voice is intersectional and across age groups and lived experiences, especially for those from Black and Racially Minoritised, QTIPOC, and TNBI communities. • A six-monthly review meeting with organisations who are distributing the CRF to gather feedback about impact of the fund, and emerging trends/issues • A progress and outcomes report will be submitted to a future Cabinet meeting regarding the latest round of CRF
5. Ensure that the council's Cost of Living hub on the website remains accessible for as many people as possible, especially from a disability, Easy Read and BSL provision, and migrant/ refugee/ asylum seeker perspective. Community Hub to provide ongoing support for those who find online access difficult. Every access route will have a non-digital alternative.
6. Invest in support programmes where advice is aligned alongside practical support. <ul style="list-style-type: none"> • Energy advice • Financial advice • Debt advice

Which action plans will the identified actions be transferred to?

- For example: Team or Service Plan, Local Implementation Plan, a project plan related to this EIA, FIAP (Fair and Inclusive Action Plan) – mandatory noting of the EIA on the Directorate EIA Tracker to enable monitoring of all equalities related actions identified in this EIA. This is done as part of FIAP performance reporting and auditing. Speak to your Directorate's Business Improvement Manager (if one exists for your Directorate) or to the Head of Service/ lead who enters actions and performance updates on FIAP and seek support from your Directorate's EDI Business Partner.

Local team/ service implementation and practice plan.

8. Outcome of your assessment

What decision have you reached upon completing this Equality Impact Assessment? (Mark 'X' for any ONE option below)

Stop or pause the activity due to unmitigable disproportionate impacts because the evidence shows bias towards one or more groups.	
Adapt or change the activity to eliminate or mitigate disproportionate impacts and/or bias.	
Proceed with the activity as currently planned – no disproportionate impacts have been identified, or impacts will be mitigated by specified SMART actions.	X
Proceed with caution – disproportionate impacts have been identified but having considered all available options there are no other or proportionate ways to achieve the aim of the activity (for example, in extreme cases or where positive action is taken). Therefore, you are going to proceed with caution with this policy or practice knowing that it may favour some people less than others, providing justification for this decision.	

If your decision is to "Proceed with caution", please provide a reasoning for this:

Summarise your overall equality impact assessment recommendations to include in any committee papers to help guide and support councillor decision-making:

The distribution of the CRF is in itself a mitigation for the impacts of the Cost of Living crisis on individuals with protected characteristics. Broad access to the fund will help to ensure that help is distributed as fairly as possible, reaching households most in need. A number of actions have been identified to ensure equity and intersectional considerations and approach which will be reviewed as required.

9. Publication

All Equality Impact Assessments will be published. If you are recommending, and choosing not to publish your EIA, please provide a reason:

10. Directorate and Service Approval

Signatory:	Name and Job Title:	Date: DD-MMM-YY
Responsible Lead Officer:	Paul Ross-Dale and Tabitha Cork (WRBS Managers in the Welfare Revenues & Business Support Service)	06/03/2026
Accountable Manager:	Lynsay Cook, Head of Service Hub and Elizabeth Griffiths, Chief Finance Officer	09/03/2026

Notes, relevant information, and requests (if any) from Responsible Lead Officer and Accountable Manager submitting this assessment:

EDI Review, Actions, and Approval:

[Equality Impact Assessment sign-off](#)

EIA Reference number assigned:

For example, HNC##-25-Dec-23-EIA-Home-Energy-Saving-Landlord-Scheme

EDI Business Partner to cross-check against aims of the equality duty, public sector duty and our civic responsibilities the activity considers and refer to relevant internal checklists and guidance prior to recommending sign-off.

Once the EDI Business Partner has considered the equalities impact to provide first level approval for by those submitting the EIA, they will get the EIA signed off and sent to the requester copying the Head of

Service, Business Improvement Manager, [Equalities inbox](#), any other service colleagues as appropriate to enable EIA tracking, accountability, and saving for publishing.

Signatory:	Name:	Date: DD-MMM-YY
EDI Business Partner:	Eric Page	Thu 5 th Feb 2026
EDI Manager:		-

Notes and recommendations from EDI Business Partner reviewing this assessment:

See comments for further reflection or suggestions throughout the doc, but the EIA is otherwise fit for purpose and demonstrates genuine engagement with complexity and intersectionality.

Notes and recommendations (if any) from EDI Manager reviewing this assessment: