

Appendix 3 - Equalities Impact Assessment

Local Welfare Provision

Preface:

The Local Welfare Provision to replace Community Care Grants and Crisis Loans from April 2013 will be a new service for Brighton and Hove City Council. As such, there is no specific data to represent the users of the scheme as it will be. The equalities data contained in this document has been gathered from other financial schemes for low income households, in the understanding that the represented client groups may be similar. However, we are mindful that this new service may not mirror the way in which other services currently operate or would necessarily be accessed in the same way by certain groups within our community. This will be a discretionary fund and as such the users may not replicate that of statutory benefits, such as Council Tax Benefit.

The national data that we have used from the Department of Work and Pension's (DWP) existing Discretionary Social Fund is not considered representational of Brighton and Hove's local population and cannot be used to identify potential disproportionate impacts. Lastly, the equalities data gathered by the DWP falls within broader categories than those used within this document.

It is intended that year one of the new scheme will be used to monitor and gather equalities information on our applicants, to feed into and update this working document throughout the year. By the implementation of year two, this EIA will be representational of who is accessing these funds locally in Brighton & Hove, and who may be under represented. This document is therefore presented as a live draft.

A Health Impact Assessment is also included at the end of this assessment. This is not legally required, but is regarded as best practice. Conclusions within it will inform the development of a scheme which takes account of the health and well-being of potential applicants to and beneficiaries of the scheme.

Local EIA information gathering exercise:

Due to the lack of local data specific to the Social Fund, an information gathering request was sent out to the CVSF equalities network. Some of the responses received have fed into the Community Engagement section in the analysis of this document. The questions asked were as follows:

- Do you currently signpost or assist clients to apply for Community Care Grants or Crisis Loans? If so, please tell me which fund you feel is more commonly used by your client group.
- If you do not feel CCGs and CLs are commonly used by your client group, I'd appreciate your opinion on why you think this might be? e.g. Lack of accessibility; access to alternate financial assistance that is more targeted to your client group; lack of communication or awareness; low rate of success/award etc
- Please tell me approximately how many such cases occur in a month/year
- Please let me know what you feel are the main barriers, if any, to this fund.

Aim of Policy or Scope of Service:

From April 2013 the Government is abolishing Community Care Grants and Crisis Loans for general living expenses and the budget will be passed, non-ring-fenced to Local Authorities to administer.

The Council is looking to introduce its own local discretionary service to administer these funds. The Government will be reducing the budget in an attempt to align expenditure based on the DWPs 2005/2006 expenses. It will then be for local authorities to determine how to manage that funding reduction. The government's intention in localising the support that has previously been provided by Crisis Loans and Community Care Grants is that local authorities are better placed to provide assistance in these circumstances. Many of the reasons for making an application will be linked to wider services that the council already provides, such as moving on from care. It is also hoped that longer term support will be easier to access through local authorities. Finally, local control of a budget will ensure that best use is made of the limited funding.

The government have announced a provisional budget for Brighton & Hove of £630,000. In 2010/11, more than a million pounds was spent on Community Care Grants and Crisis Loans in this city in 10/11. This means we are dealing with a budget that is approximately 40% less than it was two years ago. The discretionary scheme was designed to help people on low incomes manage large items of expenditure and cope with emergencies. Each element of the discretionary scheme has a distinct purpose and eligibility criteria. The council needs to give consideration to vulnerable groups in the design of a new system.

The government's consultation response is not prescriptive about how this should be done. Rather the government draws councils' attention to existing responsibilities including the Child Poverty Act 2010, the Disabled Person Act 1986 and the Housing Act 1996 as well as the public sector equality duty in section 149 of the Equality Act 2010.

By moving away from a remote model of central administration to local delivery, customers will be better served as we know that those accessing the current service have complex needs (long-term benefit claims, lower incomes) and may benefit from an integrated, locally-delivered approach which will deliver a more responsive, better targeted and relevant service to the most vulnerable. We are considering basing our local scheme on the following foundations:

- To allow people to return to or remain in the community without the need for extra care
- To support the most vulnerable in urgent situations through signposting to appropriate support services, advice, or through provision and access to goods
- To use the funds in the short term in order to prevent further and higher impacts on other service budgets in the city
- To engage individuals with appropriate support services, where needed, to help identify underlying causes for needing assistance
- To meet standing statutory duties under Homeless, Equalities, Human Rights Act and Child Protection legislation

Principles of the scheme:

Due to the limited amount of money we have available for the scheme, we will be unable to replicate the provisions currently in place by the DWP. We need to make sure we are achieving best value for money and helping as many people as possible in sustainable and appropriate ways. As such, a set of standards are being considered to reduce spending and ensure needs are targeted, while fitting in with the council's wider commitments to sustainability and tackling inequality. These are:

- where possible to provide applicants with the items that they have requested directly.
- where possible, to provide quality second hand items and through this, to ensure that full use is made of the funding
- to offer support, advice and signposting that will meet longer term needs
- to use the service to promote the use of recycling schemes in the city
- that the funding should be available only to people who are current residents of Brighton & Hove.

Since further Welfare Reforms are expected to come into effect over the next few years, the annual review of any scheme we deliver will have to consider the additional and cumulative impact of these changes. The consultation report on the Social Fund is clear that the proposed new structure does not deliver the necessary changes by itself; it is only a proposed way of organising services to help facilitate a move to a new way of working that is fit for purpose going forward.

Following restructure, there will still be a lot of work to do to fully achieve a redesigned service that is able to deliver the desired service improvements and organisational effectiveness. The proposals set out a new structure for the service and the associated implications for staffing, roles and responsibilities. However, the proposals do not attempt to resolve all of the detailed changes that will be necessary.

This impact assessment is a 'live' document and will be updated and focus on details of the proposals once the consultation period is complete and final service model agreed.

Current Scheme based on national data

Community Care Grants and Crisis Loans are two of the discretionary funds administered by the Department for Work and Pensions (DWP) under the Social Fund. The DWP has produced an Equalities Impact Assessment on the localisation of these funds, published in October 2011.

This EIA document uses data gathered from Crisis Loan and Community Care Grant applications made in 2009/10, as summarised in the Social Fund Annual Report 2010 and DWP data from May 2010. The data provided in the EIA is national and therefore it is difficult to predict local demand based on the information provided.

As such, this section will deal with the scheme as it is currently delivered, based on national trends in equalities data relating to these schemes.

Localised Data based on general population census and Council Tax Benefit records

Applicants to the current discretionary Social Fund are low income households.

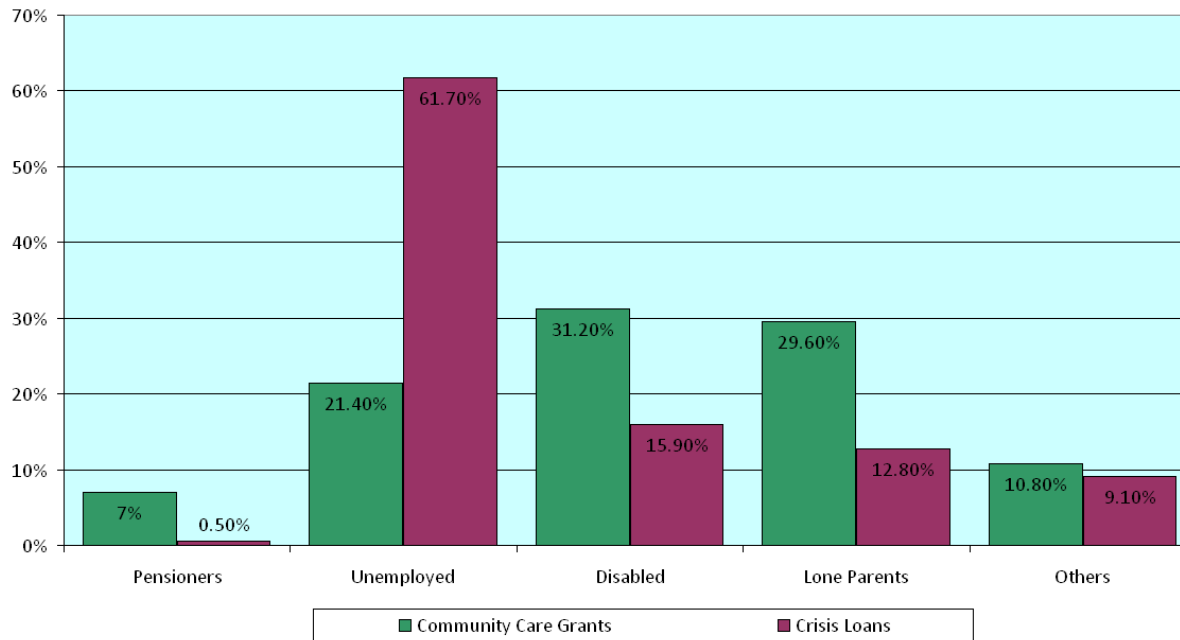
All applicants to Community Care Grants must be in receipt of a means-tested benefit and 61% of all requests for a Crisis Loan come from an unemployed person.

As such, we have mostly used local equalities information from our Housing and Council Tax Benefits caseload.

ALL GROUPS

National Data (DWP table)

2011-12 Total Expenditure by Client Group



ALL GROUPS

Analysis

National data on Discretionary Social Fund usage reveals that the two funds are primarily accessed by different groups of the population. Crisis Loans are primarily accessed by young, unemployed individuals whilst Community Care Grants have a strong representation from Disabled people and Lone Parents. It could be considered that young, unemployed people receive the lowest proportional benefit income and therefore may be more likely to struggle to budget for their needs appropriately and find themselves in financial crisis more easily.

Disabled people and lone parents may be more frequently in need of Community Care Grant assistance due to the principle eligibility criterion of the scheme, namely to enable a person to return to or remain in the

Localised Data**Crisis Loans**

Brighton & Hove	2005-2006	2009-2010
Number of applications	2,440	7,270
Number of Awards	1,910	5,530
Total Spend	£111,200	£284,500
Average Award	£58	£51

Community Care Grants:

Brighton & Hove	2005-2006	2009-2010
Number of applications	2,160	2,480
Number of Awards	1,120	1,370
Total Spend	£529,900	£537,600
Average Award	£472	£394

There are 27,809 households in the city claiming Council Tax Benefit (CTB), approximately 23% of all households. 7,278 (26%) of those households contain at least one dependent child. 49,360 people live in households in receipt of CTB, 18% of the city's population. This comprises of 36,915 adults, 12,445 dependent children of which 11,830 are aged under 18. This is 17% of the city's adult population and 22% of children aged under 18.

All current and potential CTB claimants are protected by the Equality Act 2010 in relation to their protected characteristics. Therefore in developing a new local scheme to assist those on low incomes we aim to avoid disproportionate negative impact related to protected characteristics.

The work to consult on the changes and then communicate the chosen option will include explanation of the rationale and evidence that every effort has been made to develop a fair system and to avoid unlawful discrimination. This enables us to explain our legal duty to give 'due regard' to the needs of 'protected characteristics' groups.

Geographical distribution of CTB is also potentially important to community cohesion, in relation to the possible impact on large percentages of ward populations. Distribution of households in receipt of CTB is not evenly distributed across the city. More than two out five households in East Brighton ward (42%) get CTB compared to only one in ten households in Hove Park ward (10%). See [Table 6](#) at the end of this document.

community, or to ease exceptional pressure on families. Additionally these two groups may be more likely to require large scale expenditure items that are difficult to budget for on a low income, such as disability equipment or children's provisions.

Importantly people of pensionable age are represented very poorly in the national data. It could be considered that people of pensionable age receive, per head, the highest level of benefit income, in comparison to a family unit or young single person. Although the poor representation may also mean that they may be receiving less sign posting to the service through their avenues of support, or it could be related to other difficulties.

ALL
GROUPS

Community engagement	Impacts Identified	Potential Actions
<p data-bbox="248 209 875 320">Extensive engagement carried out as pre consultation with the third sector agencies, currently supporting applications to these funds.</p> <p data-bbox="248 352 875 608">Widespread communication of the consultation through the CVSF and the CVSF equalities network, individual communication alerts with charities and support groups throughout the city, emailshots to 3,000 Council Housing tenants, as well as various other departments, agencies and groups as listed in appendix 1.</p>	<p data-bbox="875 209 1570 288">There is a an under representation of applications from those people of pensionable age.</p> <p data-bbox="875 320 1570 464">There is a higher level of applications from unemployed, single people. We have been advised from those administering and supporting the current scheme that these are commonly men.</p> <p data-bbox="875 496 1570 608">There is a disproportionate representation of women amongst applicants from single parent families (in Brighton and Hove 94% of single parents are women)</p> <p data-bbox="875 639 1570 719">There is a disproportionate number of applications from Disabled people.</p>	<p data-bbox="1570 209 2132 496">Ensure the new scheme is widely promoted throughout the CVSF, Social Care Services and all internal departments particularly dealing with households on low incomes and older people. This can be through the Adult Learning Centres in the community, such as Hangleton and Knoll, The Bridge and Whitehawk Inn</p> <p data-bbox="1570 528 2132 671">Maintain linkages with schools and youth centres and feed into advice services in relation to what is provided to young people around budgeting advice.</p> <p data-bbox="1570 703 2132 783">Ongoing engagement with the Advice Services Network.</p> <p data-bbox="1570 815 2132 895">Applications must be clear, simple and transparent.</p>

AGE

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AGE

National Data

Crisis Loan award and success rates based on final decisions by age

Age band	Number of Applications	% of Total	Number of Awards	Success rate
Under 18	89,110	3%	67,110	75%
18 to 24	1,283,090	37%	942,990	73%
25 to 34	1,007,410	29%	773,410	77%
35 to 44	655,930	19%	515,070	79%
45 to 49	216,170	6%	170,720	79%
50 to 54	129,410	4%	102,200	79%
55 to 59	75,090	2%	59,170	79%
60 to 64	23,700	1%	17,710	75%
65 to 69	8,150	0%	5,600	69%
70 to 79	5,280	0%	3,370	64%
80 to 89	730	0%	430	59%
90 and over	40	0%	20	55%
Total	3,494,110	100%	2,657,790	76%

Community Care Grants final award and success rates based on final decisions by age

Age band	Number of Applications	% of Total	Number of awards	Success Rate
Under 18	8,490	1%	3,700	44%
18 to 24	152,250	24%	57,530	38%
25 to 34	167,460	26%	73,970	44%
35 to 44	133,970	21%	66,800	50%
45 to 49	50,760	8%	25,990	51%
50 to 54	36,570	6%	19,500	53%
55 to 59	27,020	4%	14,990	55%
60 to 64	21,490	3%	12,810	60%
65 to 69	13,730	2%	8,420	61%
70 to 79	15,600	2%	10,260	66%
80 to 89	4,390	1%	3,130	71%
90 and over	490	0%	350	70%
Total	632,220	100%	297,440	47%

Analysis

The national DWP data shows that there working age people are strongly represented in both applications types, although this tapers off significantly for those aged 45+. There is a significantly lower level of applications from people of pensionable age. Whilst award rates for Crisis Loans are lower amongst older people, younger people are less likely to receive an award for Community Care Grants.

Local data from the census identifies that Brighton & Hove has a greater proportion of younger people living in the city, particularly those aged 20-24. This is likely to be due to the presence of the city's two universities.

The age profile for those in receipt of CTB, shows that there is a larger proportion, in relation to percentages of the city's population, of people living on a low income between the ages of 35 and 64.

Localised Data**Brighton & Hove (Census 2011)**

People age	Count	Percentage		People age	Count	Percentage
0-4	15300	5.60%		50-54	15300	5.60%
5-9	13300	4.86%		55-59	12600	4.61%
10-14	13400	4.90%		60-64	12700	4.65%
15-19	18000	6.58%		65-69	9500	3.47%
20-24	28100	10.28%		70-74	7900	2.89%
25-29	23000	8.41%		75-79	6700	2.45%
30-34	21900	8.01%		80-84	5600	2.05%
35-39	21800	7.97%		85-89	3800	1.39%
40-44	21900	8.01%		90+	2200	0.80%
45-49	20400	7.46%		All people	27,3400	100.00%

Age data is only available for the claimant and their partner (32,825, 89% of all adult household members). The table below shows only Housing and Council Tax Benefit claimants

Age	Number	%
16 to 18	47	0.1%
18 to 24	1,864	6%
25 to 34	5,193	15%
35 to 49	9,860	30%
50 to 64	6,843	21%
65-79	5,774	18%
80 and above	3,273	10%
Total	32,854	100%

NB: Percentages have been rounded

Over 30% of people affected by the abolition of Council Tax Benefit and changes to Housing Benefit are under 35. As such, the likely cumulative impact of the wider welfare changes are disproportionately affecting young people (under 35) and so they are more likely to be living on a lower relative income than other age groups. In light of this, there may be an increased demand for emergency financial assistance from younger people.

Community engagement

AGE

Community engagement

Consultation invitations sent out to all charitable and support services through the CVSF equalities network.

Representation at the Advice Services Partnership and Advice Services Network meetings to ensure the communication around the consultation and set up of any new service is shared with advisors working across all age groups.

Impacts Identified

People of pensionable age are under represented in the national data

Those aged 80 and over are less likely to receive an award for a Crisis Loan

Younger people are less likely to receive an award for Community Care Grants

Potential Actions

Clear communication strategy to promote the new scheme city wide, focusing particular engagement with those advising and supporting older people, ie Social Care Services, Sheltered Housing, Age UK, Housing and Social Inclusion and the Revenues and Benefits Service.

To gather and monitor equalities data on applicants to this new service, adjusting the policy and promotion of the scheme to enable fair and even distribution of the funds, as necessary and appropriate.

Summary of feedback from the community and voluntary sector
In relation to people of pensionable age:

-People of pensionable age are more likely to apply for community care grants than crisis loans.

-Brighton fund applications must be preceded by a community care grant application.

-Community care grants are essential for people with no other money but loans may make people worry

-Often other avenues for support are sought because community care grants take too long to process

Cumulative Impacts from the Welfare Reforms to be considered within the criteria for awards under the new scheme.

To appreciate the need for speedy resolutions to the request for assistance in cases of urgency.

Engagement with Age UK and other services primarily dealing with older people to ensure that the new scheme is well communicated and access by this group.

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DISABILITY

DISABILITY

National Data

Crisis Loan applications awards and success rates based on final decisions by disability

Disability status	Number of Applications	% of total	Number of Awards	Success rate
Not disabled	2,334,300	66%	1,766,750	76%
Disabled	1,096,270	31%	844,360	77%
Not considered	5,650	0%	4,260	75%
Unknown	76,690	2%	54,460	71%
All	3,512,920	100%	2,669,830	76%

Community Care Grants applications awards and success rates based on final decisions by disability

Disability status	Number of Applications	% of total	Number of Awards	Success rate
Not disabled	358,890	57%	155,980	43%
Disabled	210,620	33%	101,540	48%
Not considered	4,850	1%	3,120	64%
Unknown	59,560	9%	37,190	62%
All	633,930	100%	297,830	47%

Analysis

There does not appear to be a clear disadvantage for award and application levels for Disabled people in accessing either Community Care Grants or Crisis Loans

As this is national Data we are unsure as to the cause of the lower rates of success for those who have stated whether or not they have a disability in comparison to those who have not stated.

Localised Data

Disability data is only available for the CTB claimant and their partner (32,826 or 89% of all adult household members). In this instance a person is defined as disabled if they are in receipt of Disability Living Allowance (DLA), Severe Disability Allowance and / or Attendance Allowance.

Age	Disabled		Severely disabled	
	N	% of age group	N	%
16 - 18	2	18%	2	18%
18 - 24	147	10%	102	7%
25 - 34	479	10%	315	7%
35 - 49	1,702	18%	1,049	11%
50 - 64	2,048	28%	1,227	17%
Over 65	2,269	22%	1,714	17%
Total	6,647	20%	4,409	13%

A fifth of adults living in a CTB household (6,647, 20%) are disabled, with 4,409 (13% of the full caseload) being severely disabled. In the CTB and HB caseload is defined by what type and elements of disability benefits they receive.

One in ten adults (626, 10%) aged 18 to 34 living in a CTB household are disabled (417 (7%) severely disabled).

More than a quarter of adults aged 50 to 64 (2,048, 28%) living in a CTB household are disabled. Proportionally this is more than for adults aged 65 and over (2,269, 22%).

Among the 7,278 CTB households with at least one dependent child, 577 households (8%) have at least one dependent child who is who is receipt of disability related benefits.

DISABILITY

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Community engagement

DISABILITY

Community engagement	Impacts Identified	Potential Actions
<p>Summary of feedback from the community and voluntary sector</p> <ul style="list-style-type: none"> - Long complex forms are a barrier to disabled people - The current telephone/call centre application process for crisis loans is a barrier to disabled people. - Not everyone can access Job Centre Plus to use their facilities - Lack of accessibility is a general problem 	<p>Long on hold times mean Crisis Loans applications can be expensive to make. Many people travel to access free phones from the JobCentrePlus or Brighton Unemployed Centre, for example. This option may not be possible for some disabled people.</p>	<p>Proposed new scheme will provide combine the two funds and provide one route of access to the fund.</p> <p>Multiple ways to access the scheme must be available – though phone, on-line, paper forms and face-to-face interviews.</p> <p>Ensure the process of application is simplified and that notifications are clear and transparent for customers.</p>
<p>-Lack of awareness of the entire system is frequently encountered</p>		<p>CVSF event to communicate new scheme and representation on Advice Services Network meetings before April 2013. Ensure that advice and support services, internally and externally, are well informed of the changes and how to access the service.</p> <p>Clear public communication strategy and signposting throughout council services.</p>
	<p>Disabled people are less likely to apply for Crisis Loans than they are to Community Care Grants</p>	<p>Through data gathering on applications in year one this under representation can be monitored. Further engagement with the Disabled community could be carried out to identify if they are less likely to be found in financial crisis or if the current application process (phone) is posing a barrier to their accessing this particular fund.</p>
<ul style="list-style-type: none"> ▪ CCGs are discretionary and budget limited 		<p>Parents of Disabled children can apply to</p>

(though not repayable) and parents of disabled children find them hard to get or inflexible.

- Advice is often given to find alternatives to community care grants.

the Family Fund – a national charity – when in need of large scale items that would alleviate need within that household. This alternative route of funding will be communicated to relevant customers to the new service.

GENDER REASSIGNMENT

National Data & Localised Data

The Department for Work and Pensions does not hold information on its administrative systems on this diversity group.

No information is collected on the gender reassignment status of CTB claimants.

Local 'Count Me In Too' research and national data show that Trans people experience higher levels of disadvantage and social / financial exclusion.

Analysis

Community engagement

Impacts Identified

Potential Actions

Lack of relevant data to identify representational issues

To gather and monitor equalities data on applicants to this new service, adjusting the policy and promotion of the scheme to enable fair and even distribution of the funds, as necessary and appropriate.

RACE

National Data

Crisis Loan awards and success rates based on final decisions by ethnicity

Ethnic group	Number of applications	% of total	Number of awards	Success rate
White	2,777,560	79%	2,130,500	77%
Mixed	69,020	2%	51,460	75%
Asian or Asian British: Indian	19,790	1%	14,090	71%
Asian or Asian British: Pakistani	31,230	1%	21,240	68%
Asian or Asian British: Bangladeshi	9,740	0%	6,200	64%
Asian or Asian British: Other Asian	9,830	0%	6,920	70%
Black or Black British: Black Caribbean	78,920	2%	58,310	74%
Black or Black British: Black African	61,830	2%	44,000	71%
Black or Black British: Other Black	21,270	1%	15,580	73%
Chinese or Other Ethnic Group: Chinese	1,040	0%	710	68%
Chinese or Other Ethnic Group: Other Ethnic Group	30,050	1%	21,090	70%
Prefer not to say	178,790	5%	134,080	75%
Unknown	223,840	6%	165,640	74%
All	3,512,920	100%	2,669,830	76%

Analysis

National DWP data identifies that Community Care Grant success rates are fairly evenly distributed among ethnicity groups, however Chinese ethnic groups do have a slightly higher representation of successful applications for Community Care Grants. Bangladeshi, Pakistani and Chinese ethnicity groups have experienced a slightly lower rate of success than other ethnic groups for Crisis Loans.

Community Care Grant final awards and success rates based on final decisions by ethnicity

Ethnic group	Number of applications	% of total	Number of awards	Success rate
White	413,490	65%	180,470	44%
Mixed	10,650	2%	4,680	44%
Asian or Asian British: Indian	3,080	0%	1,340	43%
Asian or Asian British: Pakistani	6,970	1%	3,100	44%
Asian or Asian British: Bangladeshi	2,260	0%	1,000	44%
Asian or Asian British: Other Asian	2,270	0%	1,070	47%
Black or Black British: Black Caribbean	14,030	2%	5,940	42%
Black or Black British: Black African	15,010	2%	6,900	46%
Black or Black British: Other Black	3,760	1%	1,670	44%
Chinese or Other Ethnic Group: Chinese	480	0%	280	58%
Chinese or Other Ethnic Group: Other Ethnic Group	8,710	1%	3,900	45%
Prefer not to say	32,830	5%	15,250	46%
Unknown	120,400	19%	72,240	60%
All	633,930	100%	297,830	47%

There is no robust and or comprehensive data available from the CTB database about a claimant's ethnicity.

Estimated resident population by broad ethnic group mid-2009:

Table 3	Brighton and Hove ethnicity	
	number	%
All persons	256.4	
White: British	208.1	81%
All BME	48.3	19%
White: Irish	3.3	1%
White: Other White	15.7	6%
Mixed	5.9	2%
Asian or Asian British	12.5	5%
Black or Black British	5.8	2%
Other	5.1	2%

We know that employment patterns and earning levels are different for different ethnic groups. We don't know the ethnicity of people locally claiming CTB, but we would expect that members of some ethnic groups will be disproportionately represented as claimants.

Community engagement

Community engagement	Impacts Identified	Potential Actions
	National Data shows that there is a proportionally lower success rate for people of a Bangladeshi or Chinese ethnicity for community care grants.	To gather and monitor equalities data on applicants to this new service, adjusting the policy and promotion of the scheme to enable fair and even distribution of the funds, as necessary and appropriate.

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RACE

RELIGION

RELIGION

National Data & Localised Data

The Department for Work and Pensions does not hold information on its administrative systems on this diversity group. Over a quarter of our residents said they had no religion in response to the 2001 census. 59% of our residents (146,466) were Christian, 1.5% were Muslim (3,635), 1.4% were Jewish (3,558), 0.7% were Buddhist (1,747), 0.5% were Hindu (1,300) and 0.1% were Sikh (237). We have no data on the religion or belief of CTB claimants locally and the census data for 2011 will not be available in time for this project. However, as for ethnicity, some religious groups experience different levels of disadvantage

Community engagement

Impacts Identified

Potential Actions

Lack of relevant data to identify representational issues

To gather and monitor equalities data on applicants to this new service, adjusting the policy and promotion of the scheme to enable fair and even distribution of the funds, as necessary and appropriate.

SEX

National Data

Crisis Loans

From the DWP EIA on Localisation of the Social Fund: In 2009/10 58% of final decisions for Crisis Loans were made in respect to single males, 34% made in respect to single females and 8% made in respect to couples. The success rates were the same for single males and females (76%) and 74% for a couple.

The majority of applications are made by unemployed recipients¹ and the award rate is a reflection of the profile of customers who currently claim JSA as 28% of the JSA caseload are female without children².

In the current system there are no differences between male and female success rates and no indication this would change if a similar assessment of eligibility is applied using a similar criterion in a locally-delivered system.

Crisis Loan award success rates based on final decisions by gender category

	Number of applications	% of total	Number of awards	Success rate
Couple	292,960	8%	217,720	74%
Single Female	1,182,720	34%	902,330	76%
Single Male	2,018,430	58%	1,537,740	76%
Total	3,494,110	100%	2,657,790	76%

Community Care Grants

From the DWP EIA on Localisation of the Social Fund: In 2009/10 49% of Community Care Grant final decisions made in respect to single females, 36% made in respect to single males and 15% made in respect to couples. The success rates for single females were higher (49%) than single males (42%) but lower than couples (53%).

During the assessment stage higher number of women than men are seen as having sufficient needs to be awarded a Community Care Grant. There is no evidence to suggest that this will change under a locally-delivered system using similar criteria.

Analysis

There is a stronger representation of male applicants to Crisis Loans, whilst women are more commonly reflected in the applications for Community Care Grants. This increased requirement under Community Care Grants could stem from the higher percentage of applications for this fund received by lone parents. (94% of lone parents in Brighton and Hove are women)

There is no clear distinction between the sexes in award rates.

¹ Social Fund Annual Report <http://www.dwp.gov.uk/docs/2010-annual-report-social-fund.pdf>

² Using DWP data from May 2010 and DWP online tab tool http://83.244.183.180/100pc/dla/tabtool_dla.html

Community Care Grant applications by gender Category (award rates not supplied by the DWP)

	Number of applications	% of total	Number of awards	Success rate
Couple	92,540	15%	Not supplied	Not supplied
Single Female	311,590	49%	Not supplied	Not supplied
Single Male	228,090	36%	Not supplied	Not supplied
Total	632,220	100%	Not supplied	Not supplied

Local Data

Gender data is only available for the CTB claimant and their partner (32,805, 89% of all adult household members)

Table 4	Male		Female	
Age	n	%	n	%
16 - 18	4		7	
18 - 24	479	32%	1,032	68%
25 - 34	1,751	37%	2,980	63%
35 - 49	4,141	44%	5,234	56%
50 - 64	3,504	49%	3,591	51%
65 and over	3,888	39%	6,200	61%
Total	13,763	42%	19,037	58%

Among CTB claimants and their partners, 58% are female and 42% male. This compares to a city profile of residents aged over 16 of 50% males and 50% females. Nearly two-thirds of adults in CTB households aged under 35 yrs are women (64%). The vast majority of single parent families in receipt of CTB in the city are headed by women: 94.4%. In one in twenty single parent households (263, 5.4%) the single parent is male. See also the section below on Families and Children.

Community engagement

SEX

Community engagement

Impacts Identified

Potential Actions

To monitor data on this diversity group to establish any change in representation once the two funds are combined into one service.

SEXUAL ORIENTATION

SEXUAL ORIENTATION

National Data & Local Data

The Department for Work and Pensions does not hold information on its administrative systems on this diversity group. We have no data on the sexual orientation of CTB claimants locally.

Brighton & Hove’s State of the City report estimated that at least 14% (38,000 of the 2011 census population) of Brighton & Hove’s adult residents are lesbian, gay, bisexual or transgender.

Analysis

Community engagement	Impacts Identified	Potential Actions
	Lack of relevant data to identify representational issues	To gather and monitor equalities data on applicants to this new service, adjusting the policy and promotion of the scheme to enable fair and even distribution of the funds, as necessary and appropriate.

MARRIAGE & CIVIL PARTNERSHIP

MARRIAGE & CIVIL PARTNERSHIP

National Data & Local Data

The Department for Work and Pensions does not hold information on its administrative systems on this diversity group.

Analysis

Community engagement	Impacts Identified	Potential Actions
	Lack of relevant data to identify representational issues	To gather and monitor equalities data on applicants to this new service, adjusting the policy and promotion of the scheme to enable fair and even distribution of the funds, as necessary and appropriate.

PREGNANCY & MATERNITY

PREGNANCY & MATERNITY

National Data & Local Data

The Department for Work and Pensions does not hold information on its administrative systems on this diversity group. The Department only holds information where it is the primary reason for incapacity. It cannot therefore be used to accurately assess the quality impacts. The Social Fund has a specific fund for this group of people, the Sure Start Maternity Grant.

Among all household in receipt of CTB, for 72 households at least one person is also in receipt of statutory maternity pay.

Analysis

<u>Community engagement</u>	<u>Impacts Identified</u>	<u>Potential Actions</u>
	Lack of relevant data to identify representational issues	To gather and monitor equalities data on applicants to this new service, adjusting the policy and promotion of the scheme to enable fair and even distribution of the funds, as necessary and appropriate.

OTHER RELEVANT GROUPS

OTHER RELEVANT GROUPS

Among all household in receipt of CTB, for 1,071 households (4%) at least one person is also in receipt of Carers Allowance.

Research suggests that the cumulative impacts of this change and other national benefits changes will have a disproportionately larger impact on disabled people (see above) than others. This has an impact on carers too.

We have no data locally on these issues for CTB claimants.

<u>Community engagement</u>	<u>Impacts Identified</u>	<u>Potential Actions</u>
	Lack of relevant data to identify representational issues	To gather and monitor equalities data on applicants to this new

		service, adjusting the policy and promotion of the scheme to enable fair and even distribution of the funds, as necessary and appropriate.
<p><u>Learning Disability:</u> Summary of feedback from the community and voluntary sector</p> <ul style="list-style-type: none"> - People with mild learning difficulties find the most helpful way to access services is face to face. People find using the telephone easier than computer or paper applications. - People who will need most help accessing these funds will not have 'critical or substantial needs' because people in these groups will tend to receive significant support. - People with learning difficulties who will need most help accessing these funds may be those people with less critical needs and therefore do not receive any support <p>•</p>	<p>Difficulty in communicating their needs appropriately. Difficulty in completing the application process without assistance.</p>	<p>The application system needs to be accessible to ensure that a person with a learning disability can accurately communicate their situation.</p> <p>Staff to be trained in communicating complex application processes in a universally comprehensible way.</p>
<p><u>Refugees and Migrants</u> Summary of feedback from the community and voluntary sector</p> <ul style="list-style-type: none"> - People who have been granted leave to remain have 28 days to claim benefits. It is common during this period for individuals to face problems accessing funds to meet their day to day living costs - In these cases Job Centre Plus often recommend people apply for a crisis loan where they should receive an alignment payment from. Council and Job Centre staff will need to be clear on the difference. - Concern was expressed at how local residence will be established because this is not currently a part of the national scheme. 		<p>We are currently working with Adult Social Care to develop better signposting and cross working</p>

Single People

Single people contribute to almost 60% of the Council Tax and Housing Benefit caseload.

Consideration of the cumulative impact of the Welfare Reforms on young single people will be taken into account by the decision maker.

Issue around domestic violence.

Summary of feedback from the community and voluntary sector

- community care grants are commonly applied for by people moving out of refuges.
- 50% of refuge users apply for crisis loans but the process is complex and often social services bridge the gap so crisis loans can be avoided
- Women who flee sometimes do so without adequate ID which makes applications humiliating and difficult
- Financial abuse can make the need for these payments more urgent.
- Most clients need help with the application process
- Evidential requirements, long phone waits, language barriers, mental health support needs and learning difficulties are all barriers to applications. Without advocacy only 5% of clients would be able to make a successful application without support.
- The current timescale for turnaround of decisions makes financial planning difficult
- Current staff who deal with crisis loans do not have enough awareness of DV issues
- Some women still live with the alleged perpetrator and this can mean they do not qualify for an award.
- Amounts are nominal in comparison with the amounts needed to set up a new home.
- There is a lack of awareness about crisis loans and community care grants
- The paid for telephone service for crisis loans can be a barrier
- Methods of payment can be a barrier where a woman does not have a bank account, this has occurred where they have insecure immigration status.

We will continue to work closely with advocates for this client group.

EFFECTS ON FAMILIES & CHILDREN

Local Data

Data for Housing And Council Tax Benefit Claimants:

Family Type	No of CTB Claims	%
Single claimant	19318	58%
Couples with no children	5185	16%
Couples with Children	2773	8%
Single Parents with Children	5578	18%
Grand Total	32854	100%

NB: Percentages have been rounded.

The latest figures for children living in poverty (2009) show 22% of children in Brighton and Hove live in poverty; approximately 10,555 children. Of those 72.8% live in lone parent households and 77.5% live in out of work families. East Brighton ward has the highest poverty with 46.9% percent of children living in poverty.

The Brighton & Hove Child Poverty Needs Assessment 2011 shows in addition that some families have a higher risk of living in poverty, most notably families with a child or parent with a disability, families with larger numbers of siblings, and some BME families.

Analysis

Community engagement	Impacts Identified	Potential Actions
	<p>Single parents are approximately twice as likely as couples to be living on a low income and claiming Council Tax Benefit. Women make up 94% of single parent families in Brighton and Hove.</p> <p>Single parents also made up close to 30% of awards to Community Care Grants in 2010/11</p>	<p>Overall welfare reform impacts will be taken into consideration by the decision maker when calculating affordability and household income.</p>

EFFECTS ON FAMILIES & CHILDREN

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HEALTH IMPACT ASSESSMENT

This Health Impact Assessment is not legally required, but is regarded as best practice. Conclusions within it will inform the development of a scheme which takes account of the health and well-being of potential applicants to and beneficiaries of the scheme.

The social model of health (see diagram below) emphasises the impacts that socio-economic factors have on people’s living and working conditions and their health, wellbeing and lifestyles. The current financial recession, welfare reforms and implications for household income and resulting health inequalities are of public health concern.

Evidence shows that level of household income affects household health. A review³ of the impact of the economic downturn and policy changes indicated that the key issues are:

- Relationship between poverty and mental ill health, particularly among women. The relationship is bi-directional: those with mental health problems are more likely to get into debt and debt is associated with increased risk of mental ill health.
- Impact of child poverty on the health and development of children. Including increased risk of mortality in first year of life, lesser personal social emotional development at school start; significantly increased risk of behaviour disorders. These factors consequently impact on educational attainment and mental health throughout the life course.
- Impact of low income on healthy living. Households on low incomes are more likely to have insufficient resources to live a healthy life e.g.
 - food options/choices – may be inclined to buy more of the many highly processed ‘unhealthy’ foods which are sold at reduced prices
 - reductions in money spent in physical activity pursuits e.g swimming,
 - reductions in expenditure on hobbies, creative pastimes and social activities which have protective effects
 - increase use of unhealthy coping mechanisms to (seemingly) alleviate stress: alcohol, tobacco and drugs

Within the population, groups such as disabled people, those with long term conditions and households in fuel poverty are vulnerable to being disproportionately affected.

<ul style="list-style-type: none"> • Association between income, debt and mental health (bi-directional) • Brighton and Hove Joint Strategic Needs Assessment (JSNA)⁴ highlights higher than average prevalence of mental health problems in City • JSNA and mental health needs 	<p>Debt associated with increased risk of mental health problems e.g. stress and anxiety. Additional stress on those already managing mental health problems and stress on family relationships</p> <p>Increased risk of unhealthy coping mechanisms e.g. alcohol, substance misuse, tobacco. Potential increase in need /</p>	<p>Communication with key health workers i.e. primary care mental health workers, Integrated Primary Care Teams, GPs, health trainers to alert them to potential impacts on people with mental health problems and the areas and population groups most affected.</p> <p>Communication on sources of advice and support, including debt</p>
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¹ UCL Institute of Health Equity. 2012. The impact of the economic downturn and policy changes on health inequalities in London

⁴ Brighton and Hove Joint Strategic Needs Assessment Summary 2012 (draft available at <http://www.bhlis.org/jsna2012>)

⁵ Winters S, McAteer S, Scott-Samuel A. Assessing the impact of the economic downturn on health and wellbeing. Liverpool Public Health Observatory report 88. 2012.

assessment identifies needs highest in East of City where proportion of residents affected by changes is highest

JSNA identifies health and wellbeing inequalities and needs in groups identified as most affected by the implementation of local discretionary social fund scheme including:

- Vulnerable groups including LGB people, disabled people, carers
- Inequalities associated with socioeconomic deprivation and areas of deprivation (e.g. East Brighton)

demand for primary care mental health services.

Effect of budgeting – reductions in income forces people to invest time and effort in managing the ramifications and means they have less to spend on supportive behaviours, positive health choices⁵ for example:

- food options/choices – may be inclined to buy more of the many highly processed ‘unhealthy’ foods which are sold at reduced prices
- reductions in money spent in physical activity pursuits e.g. swimming,
- reductions in expenditure on hobbies, creative pastimes and social activities which have protective effects
- increase use of unhealthy coping mechanisms to (seemingly) alleviate stress alcohol, tobacco and drugs

Long term impact on increased risk of development of long term conditions including diabetes and cardiovascular disease, potentially increasing health inequalities

management, to key health workers.

MIND, CRI, Carers Centres East Brighton public health commissioned services informed of changes and sources of further information.

In longer term ensure future Mental Health Promotion Strategy under development recognises socioeconomic impacts, including debt, and targets action accordingly.

In addition to the actions identified in the EIA, ensure effective targeting of healthy living services to most affected groups and areas e.g. active living, food projects, healthy eating on a budget information, stop smoking services.

Integrate with other initiatives e.g.

- families with complex and multiple needs
- carer’s needs assessments.
- Promotion of free swimming for under 16s.

Table 6

This shows that the distribution of households in receipt of CTB is not evenly distributed across the city. More than two out five households in East Brighton ward (42%) get CTB compared to only one in ten households in Hove Park ward (10%).

Data Source: from the CTB database 7/06/12

	Households in receipt of CTB	All household (2001 Census)	Percentage of all households
East Brighton	2,706	6,468	42%
Moulsecoomb and Bevendean	1,991	5,601	36%
Hollingdean and Stanmer	1,847	5,029	37%
Queen's Park	2,580	7,408	35%
St. Peter's and North Laine	1,866	7,154	26%
Hangleton and Knoll	1,813	5,931	31%
Hanover and Elm Grove	1,449	6,101	24%
South Portslade	1,011	3,830	26%
North Portslade	1,051	4,155	25%
Regency	951	4,980	19%
Brunswick and Adelaide	1,085	5,426	20%
Westbourne	953	4,315	22%
Woodingdean	957	3,822	25%
Central Hove	986	5,052	20%
Goldsmid	1,516	7,368	20%
Wish	865	3,899	22%
Preston Park	1,032	6,142	17%
Patcham	1,041	5,790	18%
Rottingdean Coastal	812	5,907	14%
Withdean	749	6,139	12%
Hove Park	386	3,961	10%
Not known	162		
Total	27,809		

Note: the Index of Multiple Deprivation (IMD) 2010 is considered the official measure of deprivation for England. IMD 2010 is based on the small area geography known as Lower Super Output Areas (LSOAs). There are 164 LSOAs in Brighton & Hove. 37 (22%) of Brighton & Hove's LSOAs are in the 20% most deprived areas in England.

Over a third of households (10,553, 38%) in receipt of CTB live in one of these 37 LSOAs.

Signing of EIA:-

Lead Equality Impact Assessment Officer:

Tabitha Cork

Date: 12th November 2012

Head of Unit

Valerie Pearce

Date: 12th November 2012

Communities and Equality Team

Sarah Tighe- Ford

Date: 12th November 2012