

Appendix Six: Summary of Equalities Impact Assessment

The city council has recently produced a Financial Inclusion needs assessment and a Financial Inclusion Strategy aimed at helping all those residents affected by financial exclusion issues within the city. Many groups of people within the city have been identified as being disproportionately affected by the changes being introduced as a result of the Welfare Reform Act 2012. A full Equalities Impact Assessment aimed at identifying those groups has been undertaken and this summarises the key findings and some of the actions that might help to mitigate impact.

Groups: At this stage key impacts are identified on the following groups:

Age:

- Changes as a result of Welfare Reform leading to reduced incomes
- Financial exclusion increases with age and older people more likely to be digitally excluded and be facing issues of food and fuel poverty
- Young people are likely to be less financially capable than older people and less likely to have a transactional bank account or be aware of support services.
- Young people are more likely to be over indebted than older age groups, but less likely to seek advice
- Single people under 35 who will be affected by the changes in benefit rules likely to face hardship

Disabled People:

- Changes as a result of Welfare Reform will impact on disabled people and their families
- Increased costs and reduced incomes resulting in greater poverty
- Physical access to advice services and access to financial products
- People with learning disabilities may have difficulty in managing their budgets

Mental Health:

- Both a cause and consequence of Financial Inclusion especially those in debt
- Potential increase in demand for (already stretched) mental health services
- Transition to Universal Credit likely to be difficult for some

Trans People:

- Impact of Single Room rate and potential for harassment if have to share accommodation
- Issues of debt, benefits and access to appropriate housing, employment advice and financial products

Race:

- Some groups (especially Pakistani and Bangladeshi) not likely to have bank account and therefore difficulty in receiving Universal Credit
- Lack of engagement of BME communities in planning and developing services
- Gypsies and Travellers inability to access financial products and advice services as well as affected by fuel poverty

Religion or Belief:

- Lack of religious or cultural awareness of financial products providers including lack of Sharia compliant products
- Faith organisations are key source of emotional and practice support during financial crisis

Refugees and Migrants:

- Habitual Residence Test and Universal Credit
- Those new to the UK system and whose English language skills are limited will face further difficulties, especially in context of reductions to funding for immigration legal advice

Sex:

- Changes as a result of Welfare Reform
- Women particularly at risk and lone parents likely to see incomes reduce as result of Welfare Reform adding to child poverty in the city
- Barriers to employment and high cost of childcare
- Third of women suffering domestic violence have no bank account
- Men have higher risk of homelessness, alcohol and substance misuse and therefore potential greater financial exclusion risk for some

Sexual Orientation:

- LGB people likely to expect poorer treatment from public services including social housing, criminal justice and health services

Carers:

- Struggling financially and significant numbers living in fuel and food poverty as a result of being in debt
- Young Carers likely to have reduced educational attainment and employment opportunities
- Access to advice services, financial products
- Potential implications arising as a result of the new 'spare room' rule

Digital Exclusion

- § New systems under welfare reform require competency in both accessing and managing benefits, bank accounts and job applications on line – this will increase the potential for digital exclusion

Actions: At this stage proposed mitigating actions are:

- Increased confidence by delivering more financial education aimed at improving young peoples' relationship with money.
- Greater financial capability in the most affected areas of Brighton and Hove – which includes city centre as well as estates.
- There is a need to raise the awareness, skills and knowledge of existing providers so that all minority groups receive appropriate services and support. This may include signposting and/or acknowledging that some groups prefer accessing help via 'trusted and safe' organisations (for example people from LGBT communities may prefer to access support through an LGBT organisation). This should also include enhanced partnership working between agencies.

- Develop appropriate responses to the needs of 'chronically excluded groups' e.g. Gypsies and Travellers, Homeless, those with several mental health problems, Transgender people).
- General improvement in publicity, information and sign-posting with regard to available support.
- The Council and Job Centre Plus will be working directly with affected households. This includes a programme of outreach visits through welfare reform programme and housing and social inclusion.
- The council will engage with national and local domestic violence agencies to identify the most appropriate service response for survivors of domestic violence.
- Promote the take up of fuel poverty programmes locally and the £4bn of Carbon Tax Money to offset the cost of home insulation, to help residents reduce bills by up to 45%.
- Profiling and monitoring of customers accessing in-house and commissioned services is critical to understand take up, gaps and inform future planning.
- Raise awareness in the city of the free access available for internet use, as well as undertake specific digital inclusion commission.
- Capacity building programme with front line services and agencies (both within the council and externally), for example through training.
- Strong equalities focus required in all work to ensure those most disadvantaged supported.

Findings and recommendations from both the EIA and needs assessment are reflected and addressed in the implementation plans.

The table below demonstrates how the findings of the financial inclusion needs assessment and the equalities impact assessment are addressed through the strategy and its implementation.

SUMMARY MATRIX

FINDINGS, RECOMMENDATIONS AND ACTIONS - FINANCIAL INCLUSION NEEDS ASSESSMENT AND EQUALITY IMPACT ASSESSMENT -

This table illustrates the relationship between the key findings of the financial inclusion needs assessment and Equalities Impact Assessment and the ways in which these recommendations will be addressed through the Strategy and its implementation.

Key:

OC refers to Implementation Two Organisational Change

PW refers to Implementation Plan Three Partnership Working

Needs Assessment Recommendation	Actions to Address	Equalities Impact Assessment Findings	Additional Actions to Address	Notes
1.1 Financial exclusion is closely associated to social exclusion but the Strategy needs to retain its focus.	Focus on financial inclusion in the Strategy with appropriate links to social inclusion issues and responses where appropriate.	EIA noted impact across most social exclusion groups and in many cases this demonstrated cumulative impact.	PW20: Ensure financial inclusion and CBP principles are embedded in all relevant strategies, commission, grants and action plans to ensure integration with all of the council's work.	Links to relevant strategies will help make the links between financial and social exclusion.
1.2 A focus on both people and place is necessary.	There is reference and focus on this throughout the main strategy document. PW8: To ensure those families most in need obtain support, establish an automatic referral process for Stronger Families, Stronger Communities (SFSC) eligible families in relation to the Community Banking Partnership commission.	- Greater financial capability necessary in key areas affected both in estates and city centre. - Given the impacts across so many protected groups (and there are so few resources to meet demand), it is essential that there is a strong equalities focus required in all work to ensure those most receive	There is reference and focus on this throughout the main strategy document and implementation plans. Actions PW8, PW11, PW17, PW30 and 19 will help to address this issue.	Note that action OC13 will enable data on need to be kept up to date.

	<p>PW11: Work with partners in the city's most financially excluded neighbourhoods to support financial inclusion activity.</p> <p>PW17: To maximise efficiency and effectiveness, ensure appropriate integration with the council's Welfare Reform programme particularly with regard to the latest DWP guidance on support for those most vulnerable.</p> <p>PW30: As part of a capacity building approach work with generic advice services to develop provision that meet the needs of disproportionately affected groups - e.g. women, disabled people and people from Black and Minority Ethnic communities.</p> <p>OC19: Improve the YIACS services delivery to meet the needs identified in the Financial Inclusion Strategy and be further informed by the Youth Access Health Checks completed Jan 2013 and evidence of good practice.</p>	<p>greatest support.</p> <p>- There is a need to raise the awareness, skills and knowledge of existing providers so that all minority groups receive appropriate services and support. This may include signposting and/or acknowledging that some groups prefer accessing help via 'trusted and safe' organisations (for example people from LGBT communities may prefer to access support through an LGBT organisation). This should also include enhanced partnership working between agencies.</p>	<p>Further actions that will compliment this are: OC13 (updating needs assessment), OC14 and PP4 (digital inclusion), OC22 (work in schools in deprived areas), PW14 (targeted work with DWP), PW24 (exploring support for those surviving DV), PW25 (further work on chronic exclusion).</p>	
<p>1.3 A focus on social housing is important but being addressed.</p>	<p>Commissioning activity will focus on addressing gaps in provision by using the results of the mapping process.</p>	<p>The EIA found that social housing tenants continue to be a priority group.</p>	<p>OC4: The council's housing team have undertaken significant work on CBP services for council tenants and the FI programme will work to build on this and broaden its scope</p>	<p>Use of mapping findings to inform future programme delivery will ensure</p>

			<p>to all eligible residents in the city.</p> <p>OC16 (undertaking a cumulative impact assessment) will enable greater understanding of those worse affected.</p> <p>PW2: (working with RSLs) will also help inform resourcing decisions going forward.</p>	<p>appropriate response to build on existing provision and address gaps.</p>
<p>1.4 There is an absence of data about private sector need.</p>	<p>OC13: Maintain updated needs, services and gaps information to ensure programme is using contemporary information and therefore efficient and effective.</p> <p>PW13: Work with private landlords to address the impact of welfare reform for vulnerable private sector tenants.</p>	<p>The EIA also found an absence of data about private sector tenants in the city.</p>	<p>Actions OC13 and PW13 should address this issue.</p>	
<p>1.5 Women (especially female headed households) are especially vulnerable both in terms of demand and supply.</p>	<p>PW24: Given the particular prevalence of financial exclusion for people surviving domestic violence, work with local agencies to consider appropriate activities.</p> <p>PW30: As part of a capacity building approach work with generic advice services to develop provision that meet the needs of disproportionately affected groups - e.g. women,</p>	<p>The EIA found significant cumulative impact for women (especially lone parents who are female). There were also particular impacts for survivors of domestic violence.</p>	<p>The council will engage with national and local women’s organisations and domestic violence agencies to identify the most appropriate service response for women and survivors of domestic violence.</p>	<p>Specific funding has been ring-fenced to help mitigate against the impacts for women.</p>

	disabled people and people from Black and Minority Ethnic communities.			
1.6 Cumulative Impact Assessment would significantly aid understanding.	OC16: To aid business planning explore the viability of a 'cumulative impact assessment' of welfare reform supported by additional expertise and resource.	The EIA found significant cumulative impact but this was hard to extract and quantify.	OC16 together with OC13 will address this issue.	
1.7 Cost/benefit analysis would be helpful.	OC15: In order to evidence the business case for investment in financial exclusion activity, explore, develop and use appropriate methodology to do this.			This was not a finding of the EIA but cost/benefit in relation to key affected groups would be useful.
1.8 The identification of issues and solutions for 'chronically excluded groups' needs further work.	PW25: Further explore the specific financial inclusion issues, needs and solutions in relation to 'chronically excluded' groups (defined in the Needs Assessment and including Gypsies and Travellers, Refugees and Migrants, Transgender and Homeless people).	Develop appropriate responses to the needs of 'chronically excluded groups' e.g. Gypsies and Travellers, Homeless, those with several mental health problems, Transgender people).	This will require further engagement and partnership work with specialist provider and community/voluntary sector organisations.	There needs to be a link between the Trans Equality Scrutiny Report recommendations and any further work Trans people.
2.1. Consider short, medium and long-term financial inclusion responses as part of the	The overarching strategy identifies the need for short, medium and long-term interventions and the actions in the implementation plans are prioritised.			The EIA needs to be updated as part of the

implementation strategy.	OC20: Ensure financial inclusion and CBP principles are embedded in all relevant strategies, commission, grants and action plans to ensure integration with all of the council's work.			review of the Strategy.
2.2 Create a Community Banking Partnership.	PW3: Undertake a major new and transformational commission to create a Community Banking Partnership, (CBP,) Commission for the city to provide services based on the ABCDEF* model of financial inclusion.		Equalities data and principles needs to be inherent to the new CBP.	
2.3 High quality debt advice is effective.	This will be included in the CBP commission (PW3) and the existing provision will be sustained through the activities within the new Advice Partnership lottery bid. (PW1)	The EIA found that debt was a major contributing factor to mental ill health.		
2.4 A range of basic bank accounts is important.	PW9: To respond to the need for choice and a range of basic banking facilities engage local Banks to explore the idea of a 'Basic Banking Forum' in the city.			The needs assessment found that there were certain groups less likely to have bank accounts e.g. young people, those with poor credit history.
2.5 Face to face support is favoured by residents.	This will be included in the CBP commission (PW3) and the existing			

	provision will be sustained through the activities within the new Advice Partnership lottery bid. (PW1)			
2.6 Raising the profile of existing services is critical.	OC11: Develop and coordinate significant communication and publicity campaign regarding financial health (to include advertising new CBP services) in partnership with Welfare Reform programme.	General improvement in publicity, information and sign-posting with regard to available support, (which takes into account the particular access needs of key groups). Promote the take up of fuel poverty programmes locally and the £4bn of Carbon Tax Money to offset the cost of home insulation, to help residents reduce bills by up to 45%.		
2.7 The Legislative Reform Order (LRO) provides a new platform for partnership with Credit Unions.	<p>PW5: Building on the findings of the Toynbee Hall report enable greater partnership working between advice providers and the credit union to ensure improved client outcomes.</p> <p>PW6: Work with East Sussex Credit Union to scope and agree appropriate support which takes forward the findings of the Toynbee Hall report.</p> <p>PW16: In order to maximise efficiencies work with other local authorities (e.g. East Sussex County Council) to support East Sussex Credit Union.</p> <p>PW23: In order to improve access and customer service, explore proposals</p>			

	<p>to operate Credit Union access points in Libraries and elsewhere in the city.</p> <p>PW28: To increase the business and profile of the Credit Union, explore the potential for community and voluntary groups to use the Credit Union for banking facilities.</p>			
2.8 Key people and places affected are known by the council and can be targeted accordingly.	<p>PW14: Develop strong partnership and integrated delivery with the local Department for Work and Pensions in relation to new Universal Credit framework and wider financial inclusion priorities.</p>	The Council and Job Centre Plus will be working directly with affected households. This includes a programme of outreach visits through welfare reform programme and housing and social inclusion.		
2.9 Support for digital inclusion is critical.	<p>OC4: The council's housing team have undertaken significant work on CBP services for council tenants and the FI programme will work to build on this and broaden its scope to all eligible residents in the city.</p> <p>OC14: Given the Government's 'digital by default' approach to welfare reform, ensure delivery of corporate digital inclusion recommendations recently agreed at Public Service Board.</p> <p>PW4: To respond to the Government's 'digital by default' agenda to welfare reform, undertake a Digital Inclusion Commission specifically focussed on financial inclusion outcomes (building on</p>	Raise awareness in the city of the free access available for internet use, as well as undertake specific digital inclusion commission.		

	findings of PSB work and linked to action 26 of this plan).			
2.10 High quality and consistent monitoring data is necessary.	PW1: Capitalise, support and partner with the Advice Partnership's new Lottery project focussed on sustainable advice provision (note that outcome of bid will not be known until April 2013). If this bid is successful it will include a strand of work looking at consistency in monitoring.	Profiling and monitoring of customers accessing in-house and commissioned services is critical to understand take up, gaps and inform future planning.	All commissioned services will include a requirement to monitor use of provision against key equality indicators.	Consider how to undertake further work if Lottery bid isn't successful by working with the Advice Partnership.
2.11 All front line service providers should monitor financial exclusion indicators.	This will be included in the CBP commission (PW3) and the existing provision will be sustained through the activities within the new Advice Partnership lottery bid. (PW1)			A range of indicators was included in the CBP commissioning plan.
2.12 Examples of good practice should be highlighted and shared.	PW29: Work with Toynbee Hall to identify and implement additional best practice financial inclusion interventions from elsewhere in the UK.			The mapping found good practice locally and this should be built on.
2.13 The council's welfare rights team offer training in the city. This should be extended and further developed to offer key front line staff (both internally and externally) skills and knowledge in	OC2: Given the integral role of the council's Welfare Rights Team in delivering training both internally and externally undertake a review of the team's location, role and responsibility to ensure fit with the recommendations of this Strategy.	Capacity building programme with front line services and agencies (both within the council and externally), for example through training, financial exclusion indicators.	OC2 and PW18	Completion of the review of the team's role and responsibilities is urgent so that this

<p>relation to welfare reform.</p>	<p>OC5: Financial inclusion training, information and awareness programme for key front line council staff to ensure financial inclusion knowledge and awareness is embedded in organisational culture and approach.</p> <p>PW18: To support greater financial inclusion awareness in the city, continue and further develop the BHCC training offer (via its Welfare Rights Team) for key partners including NHS and community and voluntary organisations.</p>			<p>work can move forward quickly. The team has recently been awarded 70k over 2 years to recruit another post.</p>
<p>2.14 Further work is necessary to map and understand how other social landlords are supporting their tenants.</p>	<p>PW2: In order to maximise efficiency and effectiveness, work with the city's Registered Social Landlords to explore joint commissioning, funding and service delivery for financial inclusion services to social housing tenants.</p>	<p>The EIA found that social housing tenants continue to be amongst those most vulnerable to financial exclusion.</p>		<p>Mapping of RSL provision already underway.</p>
<p>2.15 Further work is necessary to identify the financial education offer for the city.</p>	<p>OC22: Undertake financial education work in schools by auditing the existing curriculum delivery of Economic Well being, with particular interest to financial capability. Address gaps by working with a good standard school and Ofsted to improve other schools.</p>	<p>Increase confidence by delivering more financial education aimed at improving young people's relationship with money.</p>	<p>Need to consider whether courses etc are meeting needs – particularly in terms of people and places.</p>	<p>Mapping of financial education provision is already underway.</p>

