

Equality Impact Assessment

Directorate: Transformation	
Service: Finance & Audit	
Name of Officer/s completing assessment: Laretta Vitalis	
Date of Assessment: 20.02.2020	
Name of service/function or policy being assessed: Discretionary Housing Payments Scheme 2020-21	
1.	<p>What are the aims, objectives, outcomes, purpose of the policy, service change, function that you are assessing?</p> <p>The <u>changes</u> to the Discretionary Housing Payment scheme for 2020-21</p>
2.	<p>Who implements or delivers the policy, service or function? State if this is undertaken by more than one team, service, and department including any external partners.</p> <p>The policy is delivered by Slough Borough Council Benefit Service. Their job is to accept all applications, analyse them, request such supporting information as they see fit and assess how much local Discretionary Housing Payment a person will be entitled to within the bounds of the scheme. If the Customer disagrees with the assessment they have the right to appeal the decision to an Independent Officer employed by Slough Borough Council. If the reason for an appeal is that the Customer has provided additional information this will be classed as a review and passed back for reassessment of entitlement. If no additional information is received the assessment will still be reviewed based on the information available and the customer will be made aware of the outcome. The scheme is a discretionary scheme and though the overall circumstances are stated, the council acknowledges that there can be no statement for every single circumstance hence the Assessor will make the determination based on the principals of the scheme.</p> <p>As this is a discretionary scheme the Customer does not have another independent review body that they can go to however if there is an allegation of maladministration a complaint may be made to the Local Government Ombudsman or the route of judicial review is available.</p>
3.	<p>Who will be affected by this proposal? For example who are the external/internal customers, communities, partners, stakeholders, the workforce etc? Please consider all of the Protected Characteristics listed (more information is available in the background information). Bear in mind that people affected by the proposals may well have more than one protected characteristic.</p>

All those who live in the borough and pay rent to a Private or Social Landlord could potentially be affected by this proposal, the only people entitled to a payment under the legislation will be those entitled to Housing Benefit or the housing costs element of Universal Credit, though Housing Benefit and Universal Credit is open to anyone on a low income.

The scheme is a discretionary scheme set up to assist those people who are having difficulty paying their rent but as stated above they must be in receipt of Housing Benefits or the housing element of Universal Credit to be eligible. DHP can give assistance to those suffering financial hardship where additional help over and above their Housing Benefit or Universal Credit is available to assist with their rent costs for a limited period of time – the budget is cash limited.

The funding for the scheme was initially increased three years ago when the Welfare Reform changes were first introduced in order to give people support while they became accustomed to the changes. The amount of grant has gradually reduced year on year as the changes have become embedded.

The DHP grant was previously based on a pot determined by Central Government for 5 years, 2019-20 was the last year of this pot, and the amount of grant for 2020-2021 has been subject to the spending review. At the Spending Round in September 2019, Treasury confirmed an additional £40m in funding for DHPs for 2020-21. The funding was awarded to support the most vulnerable living in the private rented sector. For Slough this has resulted in an award of £848,666 which is £198,162 more than the financial year 2019-20 and the DHP policy has been reviewed and updated to reflect this.

- Age – the policy is generic and will help people of all ages, though certain aspects of the welfare reform legislation (e.g. Spare room Subsidy and benefits cap) does not affect people over the age of 60, so they will not be disadvantaged and therefore will not need to take advantage of this scheme.
- Disability – there are a number of changes under Welfare Reform that affects people with a disability, the DHP policy aims where possible to protect people with a disability and to protect their homes especially if they have been adapted for disabled living. In addition there has been some caselaw recently which means that those who have their homes adapted for a disabled member of the family must have DHP assessed if their Housing Benefit or the housing element of Universal Credit does not cover their full housing costs especially if there is a room used in the home for an overnight carer. SBC has prioritised in the policy support for households where there is a disabled member of the family.
- Pregnancy and maternity - where a household who has an additional bedroom and may be subject to the spare room subsidy but

	<p>is expecting a child and the spare room subsidy will be removed or reduced on the birth of the child the DHP policy aims to protect these households until the birth of the child.</p> <ul style="list-style-type: none"> • There is no specific changes to the following under the Welfare Reform Act, the changes are generic and affect all groups, the policy is therefore generic in the need to able to provide support to all parts of the community affected by Welfare Reform and to assist them into work or to fund cheaper alternative accommodation if appropriate therefore cash limited help will be available to all groups and they will be treated based on their circumstances as defined in the policy • Race • Religion and Belief • Sex • Sexual orientation • Gender Reassignment • Marriage and Civil Partnership • Other <p>This policy aims to assist some of the most vulnerable people in the community and needs to be simple and easily implemented and understood. This is why each claim is considered individually and customers are given all of the support they need to access the scheme. Officers in Benefits, Revenues, Customers Service, and Housing are fully aware of DHPs and the process of claiming.</p>
4.	<p>What are any likely positive impacts for the group/s identified in (3) above? You may wish to refer to the Equalities Duties detailed in the background information.</p> <p>None from the changes to the scheme.</p>
5.	<p>What are the likely negative impacts for the group/s identified in (3) above? If so then are any particular groups affected more than others and why?</p> <p>None from the changes to the scheme.</p>
6.	<p>Have the impacts identified in (4) and (5) above been assessed using up to date and reliable evidence and data? Please state evidence sources and conclusions drawn (e.g. survey results, customer complaints, monitoring data etc).</p>

	n/a
7.	<p>Have you engaged or consulted with any identified groups or individuals if necessary and what were the results, e.g. have the staff forums/unions/ community groups been involved?</p> <p>n/a</p>
8.	<p>Have you considered the impact the policy might have on local community relations?</p> <p>n/a</p>
9.	<p>What plans do you have in place, or are developing, that will mitigate any likely identified negative impacts? For example what plans, if any, will be put in place to reduce the impact?</p> <p>The scheme has been developed in conjunction with Strategic Housing in order to ensure that we are treating Customers fairly and providing support to those who need it the most. As the budget is cash limited and the call on the DHPs during 2019-20 was lower than in previous years, this may have been because of the close working and helping customers move away from negative circumstances which reduced their claim, or it may be just that less people applied. Regular liaison has been maintained and agreement with the above parties where we needed to limit payments in order that those most in need received the payments and that customers maintained their home. It is intended that this liaison continues as required during 2020-21.</p> <p>In addition we monitor the Customers that apply for DHP by race and age and have analysed these results taking into account the make up of the borough. We have not analysed the results by gender as one member of the household applies on behalf of the household for Housing benefits, Universal Credit and DHP</p> <p>For 2019-20 so far we have received 459 applications for DHP, and of these the vast majority were working age claimants so it would appear that this group of residents are more likely to be affected by changes to the policy.</p> <p>We note that there may come a time where DHPs have to be reduced or suspended if the grant is spent; we have worked to avoid this in 2019-20 and will continue to do the same in 2020-21 although this is unlikely to happen due to our increased budget.</p>

10. What plans do you have in place to monitor the impact of the proposals once they have been implemented? (The full impact of the decision may only be known after the proposals have been implemented). Please see action plan below.

The DHP spend is currently monitored on a monthly basis to ensure that the spend remains within budget. The details of the customers that receive DHP are available to the Management Team within the Benefits Service including protected characteristics listed above and all payments are regularly monitored. If it appears that the spend is increasing / decreasing as we come to the end of the financial year appropriate action will be taken.

What course of action does this EIA suggest you take? More than one of the following may apply	✓
Outcome 1: No major change required. The EIA has not identified any potential for discrimination or adverse impact and all opportunities to promote equality have been taken	X
Outcome 2: Adjust the policy to remove barriers identified by the EIA or better promote equality. Are you satisfied that the proposed adjustments will remove the barriers identified? (Complete action plan).	
Outcome 3: Continue the policy despite potential for adverse impact or missed opportunities to promote equality identified. You will need to ensure that the EIA clearly sets out the justifications for continuing with it. You should consider whether there are sufficient plans to reduce the negative impact and/or plans to monitor the actual impact (see questions below). (Complete action plan).	
Outcome 4: Stop and rethink the policy when the EIA shows actual or potential unlawful discrimination. (Complete action plan).	

Action Plan and Timetable for Implementation

At this stage a timetabled Action Plan should be developed to address any concerns/issues related to equality in the existing or proposed policy/service or function. This plan will need to be integrated into the appropriate Service/Business Plan.

Action	Target Groups	Lead Responsibility	Outcomes/Success Criteria	Monitoring & Evaluation	Target Date	Progress to Date

Name:

Signed:Lauretta Vitalis(Person completing the EIA)

Name:Neil Wilcox

Signed:(Policy Lead if not same as above)

Date: 18 February 2020