

Appendix 6

Equality Impact and Outcome Assessment

Title of EIA¹	Household Support Fund, Phase 2 (April – September 2022), appendix to Cost of Living (CoL) P&R (recovery) Committee report	ID No.²	HSF 2022
Team/Department³	Welfare, Revenues & Business Support (WRBS)		
Focus of EIA⁴	<p>The following is adapted from an EIA that was drafted in 2020 for the Welfare Support and Financial Assistance (WSFA) Workstream, as part of the Covid 19 response. The contents have gone on to inform similar EIAs, for example concerning Household Support Fund (HSF) phase 1, review of the Council Tax Reduction Scheme and now the Household Support Fund phase 2.</p>		

2. Update on previous EIA and outcomes of previous actions⁵

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

DRAFT

3. Review of information, equality analysis and potential actions

Groups to assess	What do you know ⁶ ? Summary of data about your service-users and/or staff	What do people tell you ⁷ ? Summary of service-user and/or staff feedback	What does this mean ⁸ ? Impacts identified from data and feedback (actual and potential)	What can you do ⁹ ? All potential actions to: <ul style="list-style-type: none"> • advance equality of opportunity, • eliminate discrimination, and • foster good relations 												
Age ¹⁰	<p>There is a limited set of current data available on the financial resilience of this characteristic group. Our assessment has mostly been based on face to face feedback from residents accessing third sector support and wider reports published since the onset of the pandemic.</p> <p>Source: Mid Year Estimates ONS 2018</p> <table border="1" data-bbox="427 954 792 1406"> <tr> <td>Population</td> <td>290,395</td> </tr> <tr> <td>0-15</td> <td>45,375</td> </tr> <tr> <td>Working Age</td> <td>206,515</td> </tr> <tr> <td>Over 65</td> <td>38,505</td> </tr> <tr> <td>Household one pensioner</td> <td>14,468*</td> </tr> <tr> <td>Household claiming Pension Credit</td> <td>6,525*</td> </tr> </table> <p>*Source: DWP Feb 2020</p>	Population	290,395	0-15	45,375	Working Age	206,515	Over 65	38,505	Household one pensioner	14,468*	Household claiming Pension Credit	6,525*	<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. • Despite COVID restrictions have now eased, older people may still feel vulnerable to infection and are more likely to continue to shield. As such they may be limited in their ability to shop for their essential needs or socialise. 	<ul style="list-style-type: none"> • Older people's health is more at risk if they cannot afford to heat their homes or eat adequately. • Those shielding will be shopping less, shopping locally or not shopping in person at all. They may not have access to full variety of goods, or the best deals (if shopping locally). This could mean food costs rise. Older people may be more likely to be digitally excluded, therefore not accessing on-line shopping slots • Young people 	<p>Ensure easy access to and smooth referrals into the advice sector for those identified as in need of financial support, including council's own Welfare Rights team.</p> <p>Ensuring community organisations representing at-risk groups are funded in order to provide financial support outside of formal council protocol.</p> <p>Information to be made clear and accessible for all and for all front-line services to be aware of support available and signpost accordingly.</p>
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	<p>¹https://www.ifs.org.uk/publications/14848</p> <p>Data from LDSF applications delivered during Household Support Fund, phase one:</p> <table border="1" data-bbox="427 655 770 1007"> <thead> <tr> <th>Age Group</th> <th>Count</th> <th>%</th> </tr> </thead> <tbody> <tr> <td>Under 25</td> <td>263</td> <td>11%</td> </tr> <tr> <td>25-39</td> <td>1174</td> <td>47%</td> </tr> <tr> <td>40-65</td> <td>1006</td> <td>40%</td> </tr> <tr> <td>Over 65</td> <td>60</td> <td>2%</td> </tr> <tr> <td>Total</td> <td>2503</td> <td></td> </tr> </tbody> </table>	Age Group	Count	%	Under 25	263	11%	25-39	1174	47%	40-65	1006	40%	Over 65	60	2%	Total	2503		<ul style="list-style-type: none"> • Young people, aged 18-25 less likely to secure employment and so more likely to be applying for Universal Credit. This age group also currently at high risk of contracting COVID-19 (C-19). • Mental Health issues are continuing to increase and demand has been identified in Youth Services such as Youth Advice Centre (YAC). • Children under 16 long term effects of further school closures, in the event of additional C-19 strains, having a greater detrimental impact on low income households. • Children at risk of insufficient or inadequate diets 	<p>less financially independent as a result of decrease in employment opportunities. More likely to be on a fixed income. If they contract C-19, they will likely choose to shield, preventing others from accessing work, community, shops etc.</p> <ul style="list-style-type: none"> • Children from low income households will spend less hours in home schooling than better off households and have less access to technology to enable home schooling.¹ This could have long term impact on mental health, educational 	<p>Preventative work by Revenues and Benefits to identify households who may be struggling with Council Tax debt and offering early intervention.</p>
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		<p>during holiday and isolation periods, due to additional financial strains on the household.</p> <ul style="list-style-type: none"> • Working age households more at risk of income reduction following impacts of C-19 restrictions on city employment levels. • Older people with limited mobility may be more reliant on public transport and therefore at greater risk of contracting C-19 • Older people more likely to have additional requirements for electronic equipment. • Older people more likely to have more expensive food costs due to specialist dietary needs. 	<p>attainment and long term employment prospects.</p> <ul style="list-style-type: none"> • Households newly furloughed or made redundant will need to adjust to lower income, regardless of pre-existing financial commitments based on their employed income – mortgage, rent, hire purchase, mobile phones, debt repayments. • Older people may make a choice of taking taxis as opposed to using the bus, to reduce risk of contracting the virus. 	

Groups to assess	What do you know⁶? Summary of data about your service-users and/or staff	What do people tell you⁷? Summary of service-user and/or staff feedback	What does this mean⁸? Impacts identified from data and feedback (actual and potential)	What can you do⁹? All potential actions to: <ul style="list-style-type: none"> • advance equality of opportunity, • eliminate discrimination, and • foster good relations 								
Disability¹¹	<p>There is a limited set of current data available on the financial resilience of this characteristic group. Our assessment has been based on face to face feedback from residents accessing third sector support and wider reports published since the onset of the pandemic.</p> <p>Source: Department for Work and Pensions Feb-Jul 2020</p> <table border="1" data-bbox="427 1018 801 1358"> <tr> <td>PIP Claimants</td> <td>10,710</td> </tr> <tr> <td>Attendance Allowance</td> <td>5,020</td> </tr> <tr> <td>UC – Limited capability for work</td> <td>1,955</td> </tr> <tr> <td>DLA</td> <td>6,615</td> </tr> </table> <p>Data from LDSF applications delivered during Household Support Fund, phase</p>	PIP Claimants	10,710	Attendance Allowance	5,020	UC – Limited capability for work	1,955	DLA	6,615	<ul style="list-style-type: none"> • Disabled people more likely to be limited in their ability to be able to increase their income to afford additional costs, due to their health/disability needs. • Disabled people may be more likely to need to keep their homes warm for their health. • Disabled people more likely to have additional requirements for electronic equipment. • Disabled people more likely to have more expensive food costs due to specialist dietary needs. • In the event of increased rates or 	<ul style="list-style-type: none"> • Increased fuel costs due to heating requirements and additional equipment for their accessibility and health needs. • Those digitally excluded may not be accessing cheaper deals on the internet • Those on a fixed income less likely to have savings or financial contingency for increased cost in food and other expenses • Some Disabled people may make a choice of taking taxis as opposed 	<p>Ensure easy access to and smooth referrals into the advice sector for those identified as in need of financial support, including council's own Welfare Rights team.</p> <p>Ensuring community organisations representing at-risk groups are funded in order to provide financial support outside of formal council protocol.</p> <p>Information to be made clear and accessible for all and for all front-line services to be aware of support available</p>
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	one shows 36% of claims came from a household with a Disabled person in the household.	further restrictions, more likely to be shielding due to pre-existing health conditions. <ul style="list-style-type: none"> • More likely to be digitally excluded. • May be more reliant on public transport and therefore at greater risk of contracting C-19. 	to using the bus, to reduce risk of contracting C-19.	and signpost accordingly. Preventative work by Revenues and Benefits to identify households who may be struggling with Council Tax debt and offering early intervention.
Gender reassignment¹²	There is a limited set of current data available on the financial resilience of this characteristic group. Our assessment has been based on face to face feedback from residents accessing third sector support and wider reports published since the onset of the pandemic.	<ul style="list-style-type: none"> • More likely to be financially disadvantaged or living on a fixed income. 	<ul style="list-style-type: none"> • Those on a fixed income less likely to have savings or financial contingency for increased cost in fuel and food expenses 	Ensure easy access to and smooth referrals into the advice sector for those identified as in need of financial support, including council's own Welfare Rights team. Ensuring community organisations representing at-risk groups are funded in order to provide financial support

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				outside of formal council protocol. Information to be made clear and accessible for all and for all front-line services to be aware of support available and signpost accordingly. Preventative work by Revenues and Benefits to identify households who may be struggling with Council Tax debt and offering early intervention.
Pregnancy and maternity¹³	There is a limited set of current data available on the financial resilience of this characteristic group. Our assessment has been based on face to face feedback from residents accessing third sector support and wider reports published since the onset of the pandemic.	<ul style="list-style-type: none"> • Already reduced income placed under greater pressure due to CoL 	<ul style="list-style-type: none"> • Reduced income risks deepening or newly establishing debt. Unable to comfortably adapt to additional costs associated with 	Ensuring community organisations representing at-risk groups are funded in order to provide financial support outside of formal council protocol.

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			<p>CoL, ie additional meals for the whole family, but specifically children of school age. Less able to buy in more food to manage isolation and holiday periods, as well as post-natal period when less able to get out.</p>	<p>Family Information Service, with links into Children's Centres, Community Midwifery and Health Visiting service, are part of the WSFA board, so issues can be identified and considered strategically across the council.</p> <p>Ensure easy access to and smooth referrals into the advice sector for those identified as in need of financial support, including council's own Welfare Rights team.</p> <p>Information to be made clear and accessible for all and for all front-line</p>

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				services to be aware of support available and signpost accordingly.

<p>Race/ethnicity¹⁴ Including migrants, refugees and asylum seekers</p>	<p>There is a limited set of current data available on the financial resilience of this characteristic group. Our assessment has mostly been based on face to face feedback from residents accessing third sector support and wider reports published since the onset of the pandemic.</p> <p>Source: Census 2011</p> <table border="1" data-bbox="432 560 795 1315"> <tr> <td>White British</td> <td>220,020</td> </tr> <tr> <td>Non-White</td> <td>29,855</td> </tr> <tr> <td>White Non-British</td> <td>23,495</td> </tr> <tr> <td>Mixed</td> <td>10,410</td> </tr> <tr> <td>Asian</td> <td>11,280</td> </tr> <tr> <td>Black</td> <td>4,190</td> </tr> <tr> <td>Other ethnic group</td> <td>3,985</td> </tr> <tr> <td>Households with multiple ethnicities</td> <td>18,340</td> </tr> <tr> <td></td> <td></td> </tr> <tr> <td>No members of household have English as first language</td> <td>5,925</td> </tr> </table> <p>Data from LDSF applications delivered during Household Support</p>	White British	220,020	Non-White	29,855	White Non-British	23,495	Mixed	10,410	Asian	11,280	Black	4,190	Other ethnic group	3,985	Households with multiple ethnicities	18,340			No members of household have English as first language	5,925	<ul style="list-style-type: none"> • More likely to be on a low or fixed income or having limited 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. • Engagement issues with advice, stemming from a reported distrust with government and council departments. • Some communities will have specific dietary needs 	<ul style="list-style-type: none"> • 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. • Due to distrust in official organisations, some groups may not be aware of support available through grants, additional benefit support or crisis intervention routes (eg food banks, Local Discretionary Social Fund (LDSF) etc • 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 	<p>Ensuring community organisations representing at-risk groups are funded in order to provide financial support outside of formal council protocol.</p> <p>Ensure information about support is accessible to all groups and encourage this information to be distributed through community-based groups. Consider all options of how financial support can be devolved to community-based groups.</p> <p>Ensure easy access to and smooth referrals into the advice sector for those identified as in need of financial support, including council's own Welfare Rights team.</p> <p>Information to be made clear and accessible for all, including translated</p>
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	<p>Fund, phase one:</p> <table border="1"> <thead> <tr> <th data-bbox="432 212 667 264">Ethnicity</th> <th data-bbox="667 212 786 264">Count</th> <th data-bbox="786 212 936 264">%</th> </tr> </thead> <tbody> <tr> <td data-bbox="432 264 667 317">AnyOther</td> <td data-bbox="667 264 786 317">25</td> <td data-bbox="786 264 936 317">1%</td> </tr> <tr> <td data-bbox="432 317 667 370">Arab</td> <td data-bbox="667 317 786 370">26</td> <td data-bbox="786 317 936 370">1%</td> </tr> <tr> <td data-bbox="432 370 667 448">Asian Bangladeshi</td> <td data-bbox="667 370 786 448">16</td> <td data-bbox="786 370 936 448">1%</td> </tr> <tr> <td data-bbox="432 448 667 501">Asian Indian</td> <td data-bbox="667 448 786 501">5</td> <td data-bbox="786 448 936 501">0%</td> </tr> <tr> <td data-bbox="432 501 667 553">Asian Other</td> <td data-bbox="667 501 786 553">9</td> <td data-bbox="786 501 936 553">0%</td> </tr> <tr> <td data-bbox="432 553 667 632">Asian Pakistani</td> <td data-bbox="667 553 786 632">1</td> <td data-bbox="786 553 936 632">0%</td> </tr> <tr> <td data-bbox="432 632 667 684">Black African</td> <td data-bbox="667 632 786 684">45</td> <td data-bbox="786 632 936 684">2%</td> </tr> <tr> <td data-bbox="432 684 667 762">Black Caribbean</td> <td data-bbox="667 684 786 762">19</td> <td data-bbox="786 684 936 762">1%</td> </tr> <tr> <td data-bbox="432 762 667 815">Black Other</td> <td data-bbox="667 762 786 815">8</td> <td data-bbox="786 762 936 815">0%</td> </tr> <tr> <td data-bbox="432 815 667 868">Chinese</td> <td data-bbox="667 815 786 868">3</td> <td data-bbox="786 815 936 868">0%</td> </tr> <tr> <td data-bbox="432 868 667 920">GypsyTraveler</td> <td data-bbox="667 868 786 920">4</td> <td data-bbox="786 868 936 920">0%</td> </tr> <tr> <td data-bbox="432 920 667 973">Mixed African</td> <td data-bbox="667 920 786 973">20</td> <td data-bbox="786 920 936 973">1%</td> </tr> <tr> <td data-bbox="432 973 667 1026">Mixed Asian</td> <td data-bbox="667 973 786 1026">9</td> <td data-bbox="786 973 936 1026">0%</td> </tr> <tr> <td data-bbox="432 1026 667 1104">Mixed Caribbean</td> <td data-bbox="667 1026 786 1104">24</td> <td data-bbox="786 1026 936 1104">1%</td> </tr> <tr> <td data-bbox="432 1104 667 1157">Mixed Other</td> <td data-bbox="667 1104 786 1157">15</td> <td data-bbox="786 1104 936 1157">1%</td> </tr> <tr> <td data-bbox="432 1157 667 1209">Not Stated</td> <td data-bbox="667 1157 786 1209">585</td> <td data-bbox="786 1157 936 1209">23%</td> </tr> <tr> <td data-bbox="432 1209 667 1262">White British</td> <td data-bbox="667 1209 786 1262">1581</td> <td data-bbox="786 1209 936 1262">63%</td> </tr> <tr> <td data-bbox="432 1262 667 1315">White Irish</td> <td data-bbox="667 1262 786 1315">14</td> <td data-bbox="786 1262 936 1315">1%</td> </tr> <tr> <td data-bbox="432 1315 667 1367">White Other</td> <td data-bbox="667 1315 786 1367">94</td> <td data-bbox="786 1315 936 1367">4%</td> </tr> <tr> <td data-bbox="432 1367 667 1378">Total</td> <td data-bbox="667 1367 786 1378">2503</td> <td data-bbox="786 1367 936 1378"></td> </tr> </tbody> </table>	Ethnicity	Count	%	AnyOther	25	1%	Arab	26	1%	Asian Bangladeshi	16	1%	Asian Indian	5	0%	Asian Other	9	0%	Asian Pakistani	1	0%	Black African	45	2%	Black Caribbean	19	1%	Black Other	8	0%	Chinese	3	0%	GypsyTraveler	4	0%	Mixed African	20	1%	Mixed Asian	9	0%	Mixed Caribbean	24	1%	Mixed Other	15	1%	Not Stated	585	23%	White British	1581	63%	White Irish	14	1%	White Other	94	4%	Total	2503			<p>insecure immigration status may fear contacting the authorities in case their details are shared with the Home Office.</p>	<p>materials in key languages for the city's migrant populations, and for all front-line services to be aware of support available and signpost accordingly.</p> <p>To ensure the needs and eligibility of NRPF households and EU nationals without access to benefits are considered within the allocation of temporary discretionary funds dispersed from central government to support households financially impacted by the pandemic. Each scheme deriving from these funds, in addition to all pre-existing discretionary funds administered by the council, should be inclusive by default.</p>
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<p>Religion or belief¹⁵</p>	<p>There is a limited set of current data available on the financial resilience of this characteristic group. Our</p>	<ul style="list-style-type: none"> Engagement issues with advice, stemming from a reported distrust with 	<ul style="list-style-type: none"> Specific dietary needs may be impacted by food 	<p>Ensuring community organisations representing at-risk</p>																																																															

assessment has mostly been based on face to face feedback from residents accessing third sector support and wider reports published since the onset of the pandemic.

Source: Census 2011

Christian	117,275
Buddhist	2,740
Hindu	1,790
Jewish	2,670
Muslim	6,095
Sikh	340
Other	2,410
No religion	115,955

Data from LDSF applications delivered during Household Support Fund, phase one:

Religion	Count	%
Buddhist	23	1%
Christian	328	13%
Hindu	2	0%
Jewish	2	0%
Muslim	80	3%
None	816	33%
Not Stated	1169	47%

government and council departments.

- Some religious groups will have specific dietary needs

shortages or price rises on high demand products (like rice, for example).

- Emergency food support available may not include items specific to dietary needs.
- Due to distrust in official organisations, some groups may not be aware of support available through grants, additional benefit support or crisis intervention routes (eg food banks, LDSF etc)

groups are funded in order to provide financial support outside of formal council protocol.

Ensure information about support is accessible to all groups and encourage this information to be distributed through community-based groups. Consider all options of how financial support can be devolved to community-based groups.

Ensure easy access to and smooth referrals into the advice sector for those identified as in need of financial support, including council's own Welfare Rights team.

	Other	82	3%									
	Sikh	1	0%									
	Total	2503										
Sex/Gender¹⁶	<p>There is a limited set of current data available on the financial resilience of this characteristic group. Our assessment has mostly been based on face to face feedback from residents accessing third sector support and wider reports published since the onset of the pandemic.</p> <p>Other data available:</p> <table border="1"> <tr> <td>Total Population:</td> <td>290,395</td> </tr> <tr> <td>Female</td> <td>145,778</td> </tr> <tr> <td>Male</td> <td>144,616</td> </tr> </table> <p>95% of single parents with an open Housing Benefit claim are women. (Northgate report 15/10/2020)</p>			Total Population:	290,395	Female	145,778	Male	144,616	<ul style="list-style-type: none"> • Women are more likely to be working part time, or on a fixed income, than men • Women more likely to be single parents. • Significant increase in reports of domestic abuse and violence throughout the pandemic, disproportionately affecting women. This results in women fleeing their homes and facing financial vulnerability through the homelessness process. 	<ul style="list-style-type: none"> • Additional burdens due to the cost of Living could have disproportionate impact on women due to the nature of their employment types. 	<p>Ensure easy access to and smooth referrals into the advice sector for those identified as in need of financial support, including council's own Welfare Rights team.</p> <p>Ensuring community organisations representing at-risk groups are funded in order to provide financial support outside of formal council protocol.</p>
Total Population:	290,395											
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Sexual orientation¹⁷	<p>There is a limited set of current data available on the financial resilience of this characteristic group. Our assessment has mostly been based on face to face feedback from residents accessing third sector support and wider reports published since the onset of the pandemic.</p>			<p>No known issues reported to disproportionately affect this group</p>		<p>Ensure easy access to and smooth referrals into the advice sector for those identified as in need of financial support, including council's own Welfare Rights team.</p>						
Marriage and civil partnership¹⁸	<p>There is a limited set of current data available on the financial resilience of this characteristic group. Our assessment has mostly been based</p>			<ul style="list-style-type: none"> • The strain of economic pressures and debt caused by an increase in the cost of living can 	<ul style="list-style-type: none"> • Homelessness places women at a significant financial disadvantage as 	<p>Ensure easy access to and smooth referrals into the advice sector for those identified as</p>						

	<p>on face to face feedback from residents accessing third sector support and wider reports published since the onset of the pandemic.</p> <table border="1" data-bbox="432 643 808 831"> <tr> <td>Married Households</td> <td>28,335</td> </tr> <tr> <td>Co-Habiting</td> <td>15,430</td> </tr> <tr> <td>Lone Parent</td> <td>8,635</td> </tr> </table> <p>Source: Census 2011</p>	Married Households	28,335	Co-Habiting	15,430	Lone Parent	8,635	<p>impact on the relationships of householders and their Mental Health</p> <ul style="list-style-type: none"> • Significant increase in reports of domestic abuse and violence throughout the pandemic, disproportionately affecting women. This results in women fleeing their homes and facing financial vulnerability through the homelessness process. • When fleeing DV, the family is often relocated away from their network of family and friends. 	<p>well as impacting on their mental health and the wellbeing of the family, as a whole.</p> <ul style="list-style-type: none"> • 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. 	<p>in need of financial support, including council's own Welfare Rights team.</p> <p>Ensuring community organisations representing at-risk groups are funded in order to provide financial support outside of formal council protocol.</p>
Married Households	28,335									
Co-Habiting	15,430									
Lone Parent	8,635									
<p>Community Cohesion¹⁹</p>				<p>Ensure easy access to and smooth referrals into the advice sector for those identified as in need of financial support, including council's own Welfare Rights team.</p> <p>Information to be made clear and accessible for all and for all front-line services to be aware of support available and signpost accordingly.</p>						

Other relevant groups²⁰	<p>Carers</p> <p>Data from LDSF applications delivered during Household Support Fund, phase 1 showed 6% of claims came from a household in receipt of Carers Allowance.</p> <p>Carers UK research March 2020, 'Caring and the Cost of Living crisis' Identified both formal and informal carers were disproportionately at risk by the Cost of Living Crisis.</p>	<ul style="list-style-type: none"> • 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. 	<ul style="list-style-type: none"> • Increased fuel costs due to heating requirements and additional equipment for their accessibility and health needs. • Those on a fixed income less likely to have savings or financial contingency for increased cost in food and other expenses 	<p>Ensure easy access to and smooth referrals into the advice sector for those identified as in need of financial support, including council's own Welfare Rights team.</p> <p>Information to be made clear and accessible for all and for all front-line services to be aware of support available and signpost accordingly.</p>
Cumulative impact²¹	No adverse impacts identified as yet, but this will be kept under review.			
Assessment of overall impacts and any further recommendations²²				

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

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

EIA sign-off:

Staff member completing Equality Impact Assessment: Tabitha Cork

Date: 28/04/2022

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

Date: 29/04/2022

CCG or BHCC Equality lead: Janice Markey

Date: 28/04/2022

References

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

This section should explain what you are assessing:

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

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

⁶ **Data:** Make sure you have enough data to inform your EIA.

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

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

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

⁸ Your EIA must get to grips fully and properly with actual and potential impacts.

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

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

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

¹⁰ **Age:** People of all ages

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

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

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

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

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

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

¹⁷ **Sexual Orientation:** The Act protects bisexual, gay, heterosexual and lesbian people

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

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

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

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

²² **Assessment of overall impacts and any further recommendations**

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

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

