

Equality and Consultation Analysis Template

Guidance for completion

- Equality analysis is a way of considering the effect on different groups protected from discrimination by the Equality Act 2010, during the Council's decision making processes.
- These 'protected groups' are those defined by race, age, gender, disability, sexual orientation, gender reassignment, religion or belief, pregnancy, maternity or breastfeeding.
- Please remember to consider children and young people as a specific group that you may need to consider the impact on, and engage with during this analysis.
- Equality analysis will help you consider whether the decision you want to take:
 - will have unintended consequences for some groups; and
 - if the service or policy will be fully effective for all target groups.
- The Council also has a statutory duty to consult.
- This equality and consultation analysis template will require you to demonstrate how equality information and the findings from consultation with protected groups and others, has been used to understand the actual or potential effect of your service or policy on the protected groups and to inform decisions taken.
- The template should summarise key issues arising from information that has been collected, analysed and included in other key documents e.g. Needs Analysis, Baseline Reports etc.
- This form should be completed on an ongoing basis at each stage of any formal decision making process. Failure to comply with this will put the Council (and specifically the elected member or officer making the decision) at risk of judicial review.
- For further help and support please contact Helen Shankster on 7683 4371 (consultation advice), Sheila Bates on 7683 1432 (CLYP consultation advice) or Jaspal Mann on 7683 3112 (equalities advice).

Context

Name of analysis	Community Support Grant Scheme
Officer completing analysis	Clare Storey
Date	September 2012

1. Briefly describe the area of work this analysis relates to:

The Community Support Grant Scheme is a new service that will be delivered by Coventry City Council to provide financial assistance to individuals and families experiencing exceptional financial pressure. Individuals and families will be able to apply for assistance with living expenses in crisis situations and to enable individuals or families to re-establish themselves or to remain in the community, for example, help with the costs of disability related equipment for those on low incomes or help with the costs of resettling prisoners.

This is a new service to be delivered by the City Council. Previously this provision formed part of the Social Fund which was administered by Department for Work and Pensions (DWP). Central Government decided to localise this type of support from April 2013. Whilst there will be no associated duties or legislative requirements for local authorities, and the funding will not be ring fenced, it is largely expected that the funds will be used to help those who are financially most vulnerable.

Scoping the analysis

2. Who are the key stakeholders, both existing and potential, that could be impacted by this work?

The key stakeholders are the applicants and award recipients themselves. The 2011/12 data supplied by the DWP tells us that crisis loans for living expenses are predominantly accessed by young, single males. Single females and single males are the predominant recipients of community care grants. It is likely that there are other potential applicants who've not previously accessed through the national DWP scheme.

Coventry		
2011/2012 (Full Year) Awards & applications rounded to nearest 10	Crisis Loan Living Expenses	Community Care Grants
Summary		
Number of Applications received	11,240	3,530
Total expenditure	£446,400	£813,300
Number of Awards	8,390	1,600
Lone Parent Status		
Lone Parent	20%	31%
Not a Lone Parent	66%	45%
Unknown	14%	25%
Age of youngest child		
0-5	19%	26%
6-8	3%	4%
9-12	2%	4%
13-16	2%	4%
No children 16 or under	74%	62%

Age of recipient		
Under 18	2%	0%
18 to 24	34%	23%
25 to 34	31%	26%
35 to 44	20%	23%
45 to 54	10%	15%
55 to 64	2%	8%
65 to 69	0%	2%
70 to 79	0%	2%
80 to 89	0%	1%
90 and over	0%	0%
Unknown	0%	0%

Household type		
Couple	8%	12%
Single Female	36%	47%
Single Male	56%	41%

Percentages may not sum to 100% due to rounding

There are also a high number of professionals who support individuals to apply for both crisis support and community support grants. These can include internal staff such as social workers and support workers, internal and external money advisors etc. General advice agencies are also key stakeholders because they support applications and can signpost applicants to the available provision. Community Support Grants will form part of wider system of financial support and advice provided throughout the city.

3. From the list above, which of these constitute protected groups?

It is likely that applicants will include all of the protected groups and the new scheme will need to ensure that equality monitoring is carried out correctly in order to analyse how it affects the protected groups in the future.

The current system of grants and loans are of particular importance to people who are covered by equality legislation. This may be due to:

- Having characteristics that make them more or less likely to take up either a Community Care Grant or a Crisis Loan
- Take up and differential outcomes

Local data provided on applicants has only been broken down on the basis of gender, age, lone parent status and household type.

4. Which of the key stakeholders (including representatives of protected groups) will need to be kept informed, consulted or actively involved in this area of work?

Key Stakeholder	Type of Involvement*	Method(s) used
Applicants	Information	Web, JCP, advice agencies.

Professionals	Information	Web, JCP, other advice agencies and verbal and written briefings.
Advice Agencies	Consultation and Involvement	Regular email and physical meeting to an established stakeholder group capable of representing users.

* *Information, Consultation or Involvement*

5. **Which, if any, parts of the general equality duty is the service relevant to? Please mark with an 'X'.**

- Eliminate discrimination, harassment and victimisation.**
- Advance equality of opportunity between people who share relevant protected characteristics and those who do not.
- Foster good relations between people who share relevant protected characteristics and those who do not.

6. **What information is available to be used as part of this analysis?**

Experiences have been shared through the stakeholder group that both supports individuals to make applications and represents their interests as users.

The national equality impact assessment on the proposal to localise this form of financial assistance drew the following conclusions:

Gender

Crisis Loans

In 2009/10 58% of final decisions for Crisis Loans were made 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 recipient¹ 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 in a locally-delivered system.

Table 1. Crisis Loan final decisions by gender

Category	Number	% of total
Couple	292,960	8%
Single Female	1,182,720	34%
Single Male	2,018,430	58%
Total	3,494,110	100%

Table 2. Crisis Loan award success rates based on final decisions by gender

Category	Number	Success rate
Couple	217,720	74%
Single Female	902,330	76%
Single Male	1,537,740	76%
Total	2,657,790	76%

Community Care Grants

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 slightly higher (49%) than single males (42%) but lower than couples (53%). Single females who are more likely to be caring for children are advantaged by the current system. During the assessment stage a 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.

Table 3. Community Care Grant final decisions by gender

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

Category	Number	% of total
Couple	92,540	15%
Single Female	311,590	49%
Single Male	228,090	36%
Total	632,220	100%

Table 4. Community Care Grant final awards and success rates based on final decisions by gender

Category	Number	Success rate
Couple	49,440	53%
Single Female	151,550	49%
Single Male	96,450	42%
Total	297,440	47%

Age

Crisis Loans

In 2009/10 a small proportion of Crisis Loans final decisions were made in respect of customers under 18 (3%) and over 45 (13%). The largest proportion (37%) of final decisions were made in respect of customers between 18 to 24 years old. Customers 65 and over also have lower success rates. Given the relative total numbers of people in the younger and older population brackets, younger people are currently more likely to apply than older people. We do not have sufficient information to understand why older people are less likely to apply and be awarded a crisis loan. However, the provision of a locally-delivered service may promote a more equal spread of applications across the age ranges. A locally-delivered system would be better able to identify the most vulnerable people in the area in part because of other related services already being provided and offer appropriate assistance accordingly.

Table 5. Crisis loan final decisions by age

Age band	Number	% of total
Under 18	89,110	3%
18 to 24	1,283,090	37%
25 to 34	1,007,410	29%
35 to 44	655,930	19%
45 to 49	216,170	6%
50 to 54	129,410	4%
55 to 59	75,090	2%
60 to 64	23,700	1%
65 to 69	8,150	0%
70 to 79	5,280	0%
80 to 89	730	0%
90 and over	40	0%
Total	3,494,110	100%

Table 6. Crisis Loan award and success rates based on final decisions by age

Age band	Number	Success rate
Under 18	67,110	75%
18 to 24	942,990	73%
25 to 34	773,410	77%
35 to 44	515,070	79%
45 to 49	170,720	79%
50 to 54	102,200	79%
55 to 59	59,170	79%
60 to 64	17,710	75%
65 to 69	5,600	69%
70 to 79	3,370	64%
80 to 89	430	59%
90 and over	20	55%
Total	2,657,790	76%

Community Care Grants

In 2009/10 the lowest proportion of final decisions were made in respect of those below the age of 18 and over the age of 45, because they are less likely to apply. However, success rates are higher for those customers aged 45 and over, and applications by older people are more likely to be successful as they may be more likely to meet the criteria as set out in Directions. Provision through a locally-delivered service may have an impact on the application rates from older people. A locally-delivered system would be better able to identify the most vulnerable people in the area in part because of other related services already being provided and offer appropriate assistance accordingly.

Table 7. Community Care Grants final decisions by age

Age band	Number	% of total
Under 18	8,490	1%
18 to 24	152,250	24%
25 to 34	167,460	26%
35 to 44	133,970	21%
45 to 49	50,760	8%
50 to 54	36,570	6%
55 to 59	27,020	4%
60 to 64	21,490	3%
65 to 69	13,730	2%
70 to 79	15,600	2%
80 to 89	4,390	1%
90 and over	490	0%
Total	632,220	100%

Table 8. Community Care Grants final award and success rates based on final decisions by age

Age band	Number	Success rate
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Under 18	3,700	44%
18 to 24	57,530	38%
25 to 34	73,970	44%
35 to 44	66,800	50%
45 to 49	25,990	51%
50 to 54	19,500	53%
55 to 59	14,990	55%
60 to 64	12,810	60%
65 to 69	8,420	61%
70 to 79	10,260	66%
80 to 89	3,130	71%
90 and over	350	70%
Total	297,440	47%

Disability

Crisis Loans

The definition of disability used in the tables below is based on whether a benefit recipient has a disability marker on the administrative datasets which is added by advisers when a customer states they have a disability.

In 2009/2010 31% of Crisis Loan final decisions were made in respect of disabled people and this represents an increase of 11 percentage points on the previous year. We do not have sufficient information to understand if this is proportionate to the total benefit caseload, but it is broadly proportionate to the JSA caseload. Overall success rates are very similar for disabled customers (76%) compared to non disabled customers (77%). There have been increases in the number of disabled customers accessing Crisis Loans. We do not have adequate information to understand the reasons why, although it is likely to be a result of increasing ESA claimants being eligible for Crisis Loans. There is no evidence to suggest that this will change in a locally-delivered system. A locally-delivered system would be better able to identify the most vulnerable people in the area in part because of other related services already being provided and offer appropriate assistance accordingly.

Table 9. Crisis Loan final decisions by disability

Disability status	Number	% of total
Not disabled	2,334,300	66%
Disabled	1,096,270	31%
Not considered	5,650	0%
Unknown	76,690	2%
All	3,512,920	100%

Table 10. Crisis Loan final awards and success rates based on final decisions by disability

Disability status	Number	Success rate
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Not disabled	1,766,750	76%
Disabled	844,360	77%
Not considered	4,260	75%
Unknown	54,460	71%
All	2,669,830	76%

Community Care Grants

In 2009/10 33% of Community Care Grant final decisions were made in respect of disabled people and this represents an increase of 12 percentage points on the previous year; the increase is probably due to the introduction of Employment and Support Allowance where the income related part is a qualifying benefit for Community Care Grants. Overall success rates are higher for disabled customers (48%) than for non-disabled customers (43%). Disabled customers are currently well served by the Community Care Grant system and there is no evidence to suggest that this will change in a locally-delivered system. A locally-delivered system would be better able to identify the most vulnerable people in the area in

part because of other related services already being provided and offer appropriate assistance accordingly.

Table 11. Community Care Grants final decisions by disability

Disability status	Number	% of total
Not disabled	358,890	57%
Disabled	210,620	33%
Not considered	4,850	1%
Unknown	59,560	9%
All	633,930	100%

Table 12. Community Care Grants final awards and success rates based on final decisions by disability

Disability status	Number	Success rate
Not disabled	155,980	43%
Disabled	101,540	48%
Not considered	3,120	64%
Unknown	37,190	62%
All	297,830	47%

Ethnicity

Crisis Loans

In 2009/10 79% of Crisis Loan final decisions are made in respect of white customers with some ethnic groups receiving less than 1% of the final decisions and this remains consistent with previous years. Preliminary analysis suggests that this is proportionate to

the general JSA caseload – these claimants are the highest users of Crisis Loans. Overall success rates are slightly higher for white customers than other groups. We do not currently know why there are marginally different success rates for customers from some different ethnic groups. A locally-delivered system would be better able to identify the most vulnerable people in the area in part because of other related services already being provided and offer appropriate assistance accordingly.

Table 13. Crisis Loan final decisions by ethnicity

Ethnic group	Number	% of total
White	2,777,560	79%
Mixed	69,020	2%
Asian or Asian British: Indian	19,790	1%
Asian or Asian British: Pakistani	31,230	1%
Asian or Asian British: Bangladeshi	9,740	0%
Asian or Asian British: Other Asian	9,830	0%
Black or Black British: Black Caribbean	78,920	2%
Black or Black British: Black African	61,830	2%
Black or Black British: Other Black	21,270	1%
Chinese or Other Ethnic Group: Chinese	1,040	0%
Chinese or Other Ethnic Group: Other Ethnic Group	30,050	1%
Prefer not to say	178,790	5%
Unknown	223,840	6%
All	3,512,920	100%

Table 14. Crisis Loan awards and success rates based on final decisions by ethnicity

Ethnic group	Number	Success rate
White	2,130,500	77%
Mixed	51,460	75%
Asian or Asian British: Indian	14,090	71%
Asian or Asian British: Pakistani	21,240	68%
Asian or Asian British: Bangladeshi	6,200	64%
Asian or Asian British: Other Asian	6,920	70%
Black or Black British: Black Caribbean	58,310	74%
Black or Black British: Black African	44,000	71%
Black or Black British: Other Black	15,580	73%
Chinese or Other Ethnic Group: Chinese	710	68%
Chinese or Other Ethnic Group: Other Ethnic Group	21,090	70%
Prefer not to say	134,080	75%
Unknown	165,640	74%
All	2,669,830	76%

Community Care Grants

In 2009/10 65% Community Care Grant final decisions were made in respect of white customers with some ethnic groups receiving less than 1% of the final decisions and this remains consistent with previous years. Preliminary analysis suggests that this is proportionate to the general JSA caseload, although there is a higher number in the unknown ethnic group which may impact on our assumptions. However, there is a higher number of prefer not to say or unknown responses in this data set. Overall success rates are slightly higher for all ethnic minority customers (average of 46%) than white customers (average of 44%) and overall success rates have decreased at the same rate for ethnic minority and white customers from 2008/09 figures. Customers from ethnic groups are currently well served by the Community Care Grant system and there is no evidence to suggest that this will change in a locally-delivered system. A locally-

delivered system would be better able to identify the most vulnerable people in the area in part because of other related services already being provided and offer appropriate assistance accordingly.

Table 15. Community Care Grant final decisions by ethnicity

Ethnic group	Number	% of total
White	413,490	65%
Mixed	10,650	2%
Asian or Asian British: Indian	3,080	0%
Asian or Asian British: Pakistani	6,970	1%
Asian or Asian British: Bangladeshi	2,260	0%
Asian or Asian British: Other Asian	2,270	0%
Black or Black British: Black Caribbean	14,030	2%
Black or Black British: Black African	15,010	2%
Black or Black British: Other Black	3,760	1%
Chinese or Other Ethnic Group: Chinese	480	0%
Chinese or Other Ethnic Group: Other Ethnic Group	8,710	1%
Prefer not to say	32,830	5%
Unknown	120,400	19%
All	633,930	100%

Table 16. Community Care Grant final awards and success rates based on final decisions by ethnicity

Ethnic group	Number	Success rate
White	180,470	44%
Mixed	4,680	44%
Asian or Asian British: Indian	1,340	43%
Asian or Asian British: Pakistani	3,100	44%
Asian or Asian British: Bangladeshi	1,000	44%
Asian or Asian British: Other Asian	1,070	47%
Black or Black British: Black Caribbean	5,940	42%
Black or Black British: Black African	6,900	46%
Black or Black British: Other Black	1,670	44%
Chinese or Other Ethnic Group: Chinese	280	58%
Chinese or Other Ethnic Group: Other Ethnic Group	3,900	45%
Prefer not to say	15,250	46%
Unknown	72,240	60%
All	297,830	47%

Sexual orientation

The DWP does not hold information on its administrative systems on the sexual orientation of claimants. The Government does not envisage an adverse impact on these grounds.

Religion or belief

The DWP does not hold information on its administrative systems on the religion or beliefs of claimants. The Government does not envisage an adverse impact on these grounds.

Marriage and Civil Partnership

The DWP does not hold information on its administrative systems on the civil partnership status of claimants. The Government does not envisage an adverse impact on these grounds.

Pregnancy and maternity

The DWP only holds information on pregnancy and maternity on its administrative systems where it is the primary reason for incapacity. It cannot therefore be used to accurately assess the equality impacts. The Government does not envisage an adverse impact on these grounds.

7. What are the information gaps?

The information provided is limited, refers to a national picture and does not specify use by all the protected groups. There is no data provided to understand how many individuals are making repeat applications to the Social Fund, or what proportion of applications come from vulnerable customers.

It is not currently known why some groups use it and others don't, this information, if collected, would help to shape future delivery of the localised scheme.

Data analysis

8. Please summarise below the key issues that your data is telling you.

The majority of applications are from single childless males, aged under 35. There are less applications from lone parents and pensioners than would be expected given the higher likelihood of these groups to be experiencing deprivation.

We know that applicants are confused about which fund they should be applying for. They also find the application form confusing and repetitive. The majority of applicants require help to fill out their application form.

Applicants often have unsettled lives and were coping with poor physical health, disability or mental illness.

The average shortfall between awards and need is £600. In these circumstances people bought second-hand goods, took up borrowing, did without an item (e.g. floor covering) or saved up the outstanding amount.

To make best use of the Social Fund applicants must have at least basic knowledge of the financial assistance available to them, however the majority of applicants do not have this, personal advisors are best placed to provide this knowledge to applicants.

Community Care Grants were often the first port of call for applicants and there were few alternatives for most applicants. Given the reliance of applicants on the scheme it is clear that there would be a negative equality impact if the scheme was removed.

Generating and evaluating options

9. What are the different options being proposed to stakeholders?

The Council has significant flexibility in designing a local policy of discretionary assistance and this presents an opportunity to rationalise existing funding streams and establish a single corporate approach to the assessment of financial need. There is also the opportunity to explore collaborative working arrangements with partners in the third sector.

However, the Council needs to establish this new local provision within a challenging timescale and from 1 April 2013 some of Coventry's most vulnerable residents will be looking to the Council to meet exceptional needs that were previously addressed by central government. There is therefore the need for a pragmatic approach to service delivery in the short term and the creation of the Council's local policy takes account of the need to have a functional provision in place from 1 April which has the resilience to meet expected demand. The Council can then focus more confidently on years two and beyond to establish a more sophisticated delivery model which fully utilises collaborative working.

There are a range of options available to the Council given that there are no legal requirements attached to the fund and nor is the funding ring fenced. However, due to the poor quality of the data from the existing scheme and the significant changes facing the scheme it is not possible to generate sophisticated options. Instead the preferred option is for the Council to run the scheme in-house as a pilot for the first year, during which the scheme will be constantly evaluated in order to inform a longer term model that can be implemented from the second year.

The following options have been discounted:

9.1 No provision

There is no statutory duty for local authorities to make any provision.

Given the current demand levels for financial assistance in the form of interest-free Crisis Loans or Community Care Grants in Coventry it would be irresponsible not to provide some form of provision. The full impact of Welfare Reforms will begin in April 2013 and this is likely to increase demand for this type of support, though this is an unknown quantity and therefore demand is difficult to forecast.

There is a strong likelihood that removing this source of money may exacerbate levels of financial exclusion they are experiencing through resorting to alternative sources of credit such as pay day loans, doorstep lending, illegal money lenders etc.

This option has been discounted due to the Council's priority to work with partners to reduce financial exclusion and provide improved access to sustainable money and debt advice and improved access to financial services.

9.2 Replicate the existing DWP system

The Social Fund was introduced over two decades ago as part of the Fowler reforms of the Social Security system. Since then welfare delivery has changed significantly. The DWP cite that the main drivers for the change are that currently decision making is too remote (at regional DWP office level), the scheme is expensive to administer, open to abuse and does not lead to improved outcomes for citizens as it does not link with local authority duties and responsibilities to broadly similar groups.

The existing DWP system provides cash payments for Crisis Loans and analysis of the increased demand has shown that it is being driven by young single people on Jobseekers Allowance, many of them still living at home, rather than reflecting a more general trend across all the benefit client groups. There is no discernable evidence to suggest that the increased demand from this group is linked to an increase in need, as it predates the recessionary rise in youth unemployment.

Cash payments are essentially a bi-product of awards being linked to a wider cash-based benefits system rather than a deliberate and preferred method of provision.

In 2010, the Department of Work and Pensions commissioned research into customer experiences³. There was customer acknowledgement that the current system was open to abuse or misuse by some applicants.

The current scheme has been criticised by both the National Audit Office and the Public Accounts Committee because it is application based and as such may not target support on those in greatest need. Reliance on self-referral is a clear risk in the current scheme and one that cannot be quantified. Another criticism was that there is no mechanism for verifying claims or ensuring that the awards have been spent in the way that they were intended.

The feasibility of moving the Social Fund system towards commercial models was assessed by KPMG in 2008 who concluded that the only commercially viable model would include deduction from benefit or tax credits or the bad debt risk would simply be too high. Based on this review DWP would not expect, or welcome local authorities following this model.

For the reasons outlined above it is not recommended to replicate DWP's existing scheme.

9.3 Therefore the recommended proposal is as follows:

The service is delivered by Coventry City Council. Customer access, assessment and provision of goods/services are delivered in house.

Applicants for Crisis Grants must be residents of Coventry, applicants for Community Support Grants must be residents of Coventry and be in receipt of a passported benefit. This will help prevent people claiming fraudulently across the country but there will be exemptions in place for those fleeing domestic violence, experiencing homelessness or resettling to the City.

Payments will not be provided as loans as these exacerbate debt and, as a local authority, we are unable to replicate the current system of debiting repayments from benefits. Therefore crisis *loans* will be provided as *Crisis Grants*.

This is a safety net payment and will not be used to replace other obligations. For example, this scheme will not pay people subject to certain disallowances or sanctions to their benefits as DWP is responsible for providing Hardship Payments to them. Any expense which the Council has a statutory duty must be met through the relevant allocated funds for this duty.

Cash will not be provided, instead vouchers for good and services are provided where an assessed need is determined in order to prevent abuse or misuse of the system and to ensure that the awards have been spent in the way that they were intended.

Residents will not ordinarily be permitted to make more than 2 claims a year for the same expenses. Repeat applications will only be considered in exceptional circumstances. Repeat applicants will be required to engage with money management advice services in order to address the underlying cause of their financial hardship. Adminstrating the service locally offers opportunities for collaborative working, to ensure that people are assessed and signposted to the right support that enables them to prevent further instances of financial hardship.

³ www.research.dwp.gov.uk/asd/asd5/rports20092010/rrep625.pdf Researcher: Ashfa Slater

Food and/or utility payments are available for Crisis Grants where there is a risk to the health and safety of the applicant and/or their family.

Customers are required to come to the City Centre in office hours to collect their voucher. Out of hours queries will be dealt with by the existing Emergency Duty Team.

Community Support Grants are available to assist with people moving out of institutional or residential care, helping people to stay in the community, or where there is exceptional financial pressure on an individual or families.

For those who require bespoke and adapted items there may be some potential for linking the new service with other existing support such as the Disabled Facilities Grant which funds adaptations to the home, to provide a more holistic package of support at the point of need.

Rent in advance will not be provided separately through this scheme because this would duplicate existing provision within the local authority. Instead customers will be routed through the appropriate routes to ensure that expert support is provided and that all available options are explored.

Income and savings will be taken into account when determining whether to provide an applicant with financial support.

Though the scheme will not fully replicate the DWP's scheme, it is acknowledged that the funding allocation will not be enough to expand the eligibility of the previous scheme and to increase customer expectations. Therefore it is recommended that the current list of excluded persons is maintained in the local scheme. For example, this would mean that persons with No Recourse to Public Funds in the UK would not be eligible for support through this scheme.

Recognising that welfare changes will increasingly impact on low income and nonworking households over the duration of this policy there is a need to ensure the fund is flexible enough to meet changing needs.

There is a finite budget for the scheme and skilled consideration is needed to ensure the budget is allocated fairly, based on need and is not over nor under-spent at year end.

Eligibility Criteria

Crisis Grant

Not enough money to pay for utilities and/or food and a Coventry resident

Support Grant

In receipt of Income Support, income based JSA, income related ESA, or any type of Pension credit, a Coventry resident

and leaving accommodation in which they received significant and substantial care and supervision and expect to be discharged within 6 weeks and be expected to receive one of the benefits indicated

or To help the applicant (or family member/carer) to remain living in the community where there is a high risk of the person needing to enter residential accommodation

or To help the applicant (or family member/carer) to set up home as part of a planned resettlement programme (following an unsettled way of life)

or if this will help with costs to ease exceptional pressures for a customer, or/and their family

or To assist with travel expenses to visit a relative who is terminally ill or a relative's funeral or to visit a child who is living with another parent pending a court decision.

10. How will the options impact on protected groups or those experiencing deprivation?

Option 1 irresponsibly exacerbates levels of financial exclusion for the reasons outlined above.

Option 2 would maintain the status quo and does not address issues of self referral and would not target support to those in greatest need.

Option 3 would improve the existing system because it addresses issues of relying on self-referral and ensuring claims can be verified and allocated to the need they were intended for. This will ensure that the funding is used for its intended purposes and can therefore support a greater number of people. Support would still be available, but would be limited to certain items. Replacing cash with vouchers is designed to support those experiencing deprivation so that they do not inappropriately use any cash provided to them. Additionally, advice would be provided through the scheme to support those experiencing deprivation to manage their money in the most effective way and to understand what help is available to them. This option could have a negative impact on those experiencing deprivation or with disabilities that make travelling difficult as vouchers would have to be collected from the City Centre.

The protected groups that are more likely to be able to access the scheme remain to be young, single males as this is the group that is least likely to have access to other income.

Due to limited publicity of the scheme there is a risk that particular ethnic groups will not be able to access the scheme due to language barriers.

Whilst the eligibility criteria for Crisis Grants remains wide, the eligibility criteria for Support Grants rests on applicants claiming or expecting to claim certain benefits. Given the various welfare reforms that are taking place the City is experiencing a downward trend of various benefit caseloads. This means that for groups like lone parents who are 98% female and moving off Income Support and not onto Employment and Support Allowance or young adults who are set to become entitled to less benefits they would be less able to access the scheme.

Females are more likely to be out of work and not claiming benefits than males which would also prevent them from accessing the scheme. However it is not clear what proportion of this group would require this type of financial assistance.

It is also not clear where benefits are being claimed on behalf of a household, how much the gender of the main applicant distorts the equality statistics of the gender/s of those eligible for the benefit.

Former looked after children, or care leavers, are not excluded from the scheme but depending on their circumstances they may be referred to Children's Services in order to access the leaving care core offer which is designed to help establish themselves in the community.

Asylum seekers and refugees with No Recourse to Public Funds will be excluded from the scheme.

11. Please detail how you could mitigate any negative impacts.

The negative impacts (mainly access, collection of provision (if necessary), and willingness to apply for the fund) can be mitigated by a series of measures.

Access could be mitigated by ensuring that all advice agencies have knowledge of the scheme and can support customers to apply for it. They can then submit a claim via phone, online or through an advice agency. The Advice Services Review is recommending the provision of telephone access points across the city, potentially in libraries, and this will enable more people to apply for the scheme without an impact on personal finances.

Collection of provision (where it is not feasible to be organised remotely for delivery to the applicant's place of residence) could be mitigated by entering into a partnership arrangement with advice agencies, which are located throughout the city, in the areas evidenced by data that are regarded to be in the highest need of such provision.

It is not considered necessary to reimburse travel costs incurred to collect the voucher in every case as Coventry is a compact urban area where travel costs are less relevant. By excluding travel costs funds can be targeted more effectively on the areas of greatest need. Arrangements may be considered in exceptional circumstances on a case by case basis.

To effectively encourage take up by the groups who are reluctant to apply for the scheme, perhaps because they view it as demeaning, a publicity campaign could be a mitigating action. This may be best delivered through trusted professionals and advice agencies because the advice may be more positively received when given by someone with whom the individual has developed a relationship. Though there may be groups of people who don't use these agencies but do need to use the scheme.

The eligibility criteria in relations to benefits will need to be reviewed regularly to ensure that it isn't precluding certain protected groups from being able to access the scheme unfairly.

The scheme will work to reduce the risk of repeat crisis situations by ensuring and encouraging customers to access budgeting and money management advice.

Those with No Recourse to Public Funds will not be eligible for the scheme, however where known, officers will signpost them to available support, for example the foodbank.

12. Identify which contractors or service users would be negatively affected by the options

From year 2 it is likely that options for contractors to provide certain goods or advice will increase as management information will be available to inform potential contracting arrangements.

Given the mitigation plans it is not anticipated that any service users or particular group of service users would be negatively affected by the options proposed. Service users may perceive a negative effect because the scheme will not provide cash and they will no longer have choice over how they deal with their crisis situation. Some service users, if they chose not to engage with the information and advice provided, may instead chose to use high cost lenders in order to fund what they determine is necessary but is not a food or utility related cost.

Formal consultation

13. Who took part in the consultation? *Please also specify representatives of any protected groups.*

WM Housing
Coventry Jesus Centre
Wood End Advice Centre
Terrence Higgins Trust

Coventry CAB
CWDA
Coventry Foyer
Staffordshire and West Midlands Probation Trust
Coventry City Council and CSWP Job Shop
Coventry Partnership
Coventry Law Centre
Coventry Cyrenians
Foleshill 396
DWP
Coventry City Council Commissioning Teams
Coventry City Council Audit & Risk Team
Emmaus
Trussell Trust – Foodbank
Coventry Refugee and Migrant Centre
Coventry City Council Community Services
Coventry City Council Children, Learning and Young People
Coventry City Council Revenues and Benefits Service
Coventry City Council Youth Offending Service
Shaftesbury Partnership

14. What were the key findings of the consultation?

All those consulted had sight of a draft policy document and many of their suggestions have been replicated in the final policy document (see section 17). A full summary of the comments received can be found at the end of this document in Appendix 1.

A minority of suggestions are not reflected in the final policy documents. Firstly, that cash should be provided instead of vouchers. Stakeholders who promote this view do so because they feel it will better equip people with the necessary budgeting skills to prevent repeat applications and they will be able to make cash go further than vouchers. However the majority of stakeholders felt that moving away from cash was a positive thing as it would remove the illegitimate usage. Secondly stakeholders were keen to replicate the external review service that currently exists in the DWP scheme. Unfortunately no funding is transferring for this provision and therefore the City Council will offer an internal review of decisions as requested. There are no identified equality implications as a result of this.

15. Are there any gaps in the consultation?

No

16. Following the consultation, what additional equality issues have emerged?

Whether Disability Living Allowance (specifically the mobility component) can be taken into account as income when deciding whether to award a discretionary fund – clarification will be sought from Benefit and Legal experts.

What definition of vulnerability is being used throughout the policy and during the decision making process. It had been kept deliberately broad in order to use the fund flexibly to support those living in deprivation whatever the cause may be. The policy does clearly set out what circumstances will be considered to be eligible to receive support.

17. Which of the options have changed following consultation and equality analysis, and how?

Clear eligibility to reflect the distinct nature and very limited parameters of this funding stream, specific wording around residency requirements for victims fleeing domestic violence, residency requirements for those resettling from institutions outside of Coventry (Rehab, Prison etc), redemption life of vouchers, the recognition of the Council's duty to those leaving the Armed Forces, recognising that a single person facing exceptional circumstances could qualify for a grant and identifying clear referral routes to other services.

Equality impact of final option

18. Please confirm below which option has been chosen for implementation.

Option 3

19. Please indicate which of the following best describes the equality impact of this analysis.

- There will be no equality impact if the proposed option is implemented.
- There will be **positive equality impact** if the proposed option is implemented.
- There will be **negative equality impact** if the preferred option is implemented, but this can be objectively justified.
Please state clearly what this justification is and what steps will be taken to ameliorate the negative impact.

The specific groups that have been identified as potentially experiencing adverse affects are women (due to them being more likely to be out of work and not claiming benefits, and therefore ineligible for Support Grants) and asylum seekers and refugees (due to them being most likely to have no recourse to public funds and therefore ineligible for any support).

These impacts will be addressed by regularly reviewing the eligibility criteria in relation to benefits to ensure that they aren't precluding certain protected groups from being able to access the scheme unfairly. Those with No Recourse to Public Funds will not be eligible for the scheme, however where known, officers will signpost them to available support, for example the foodbank.

The scheme will work to reduce the risk of repeat crisis situations by ensuring and encouraging customers to access budgeting and money management advice. This, together with the initial intervention, means that it is therefore expected that this scheme will have a positive impact on deprivation.

20. What will be the impact on the workforce following implementation of the final option? *Please make reference to relevant equality groups (with protected characteristics under the Equality Act).*

The impact on the workforce will be the creation of a number of posts to administer the scheme. Recruitment will be in line with existing Council policies and therefore should be no negative equality impact.

Formal decision-making process

Please detail below the committees, boards or panels that have considered this analysis

Name	Date	Chair	Decision taken
Project Board	14/12/12	Chris West	
Health, Social Care and Welfare Reform Scrutiny Board (5)	12/12/12	Cllr Welsh	
Cabinet	08/01/13	Cllr Mutton	
Council	15/01/13	Cllr Sawdon	

Approval

This equality analysis has been completed by:

Officer

Service Manager

Note: Failure to comply with duties on equalities and consultation will put the Council (and specifically the elected member or officer making the decision) at risk of judicial review

Director

Elected Member

Date

Monitoring and review

This section should be completed 6-12 months after implementation

- a) Please summarise below the most up to date monitoring information for the newly implemented service, by reference to relevant protected groups.

[Click here and type]

b) What have been the actual equality impacts on service users following implementation?

Analyse current data relating to the service and think about the impact on key protected groups: race, sex, disability, age, sexual orientation, religion or belief, pregnancy or maternity, gender reassignment.

It may help to answer the following questions: Since implementation

- Have there been any areas of low or high take-up by different groups of people?
- Has the newly implemented service affect different groups disproportionately?
- Is the new service disadvantaging people from a particular group?
- Is any part of the new service discriminating unlawfully?

[Click **here** and type]

c) What have been the actual equality impacts on the workforce since implementation?

[Click **here** and type]

**Equality Analysis and Consultation Template
August 2012 · Version 2.0.2**

**The latest version of this template can be found at:
<http://beacon.coventry.gov.uk/equalityanddiversity/>
*Please ensure you are using the latest version of the template.***

<u>Organisation</u>	<u>Comment</u>	<u>Response</u>
Coventry Citizens Advice Bureau (CAB) Cyrenians	How does LA define 'vulnerable'?	Vulnerability is based on the categories outlined.
CAB Cyrenians Terrence Higgins Trust (THT)	Why vouchers and not cash? Limits choice due to circumstances. Limits development of budgeting skills People can get more with cash than vouchers	In order to improve the DWP scheme it has been decided, in consultation with stakeholders, that removing cash will ensure that the fund can effectively focus on those in severe hardship.
CAB	If advances are to be paid on Universal Credit will this have to be done before applying for a CSG?	Yes - the policy states that other options are to be exhausted first and that it will not substitute for specific existing provisions, including DWP provision.
CAB Coventry Law Centre Cyrenians	How is a severe risk to health and safety defined? Does it have to be life threatening? Will council staff be sufficiently trained to understand level of medical risk?	The DGA team will not be involved with assessing medical risk. If supporting evidence is required from social workers then the team will liaise with them. If an applicant is in one of the circumstances outlined by the policy, has access to no other form of financial help and their circumstances can be verified by a support worker then they are facing a risk to their health and safety.
CAB	Further clarity is required on the definition of a local connection, is this: an address, a residency or a link?	Clarification was given at the stakeholder events on 15th August and 7th November 2012 - a residency is preferable but for those who are homeless or fleeing domestic violence the address of their temporary accommodation, friend or relative or support organisation will be accepted.
CAB	What about those who are facing a crisis away from Coventry but are Coventry residents?	They should apply to the local authority in which they are experiencing the crisis.
CAB	Will the explanation of the review process be available in different formats and languages?	Yes, on request. This is outlined in existing policy.
CAB	Eligibility criteria should be an exhaustive list so people know who is eligible.	This has been kept deliberately flexible given the discretionary nature of the fund. The list for excluded persons is an exhaustive list.
CAB	If supporting evidence is required that will cost the customer money, e.g. medical evidence, how will this cost be met?	Supporting evidence that would incur a cost for the customer will not ordinarily be requested.

Organisation	Comment	Response
CAB	If the decisions made are based on information sources directly from relevant services, and the customer is kept out of the loop, how will they be able to effectively challenge a negative decision? This process needs to be transparent.	Notes will be entered on the clients record regarding any conversations with support workers.
CAB	What is the implication for decision making of the reference to "level of indebtedness"? Will debt make you more or less likely to get a grant?	The Council is making reference here to its priority to promote financial inclusion.
CAB	Who is "The Council" with reference to reviews of decisions. Will present case law re crisis loans and CCGs apply? In which cash why are factual error and new evidence the only planks for review? This is not a re-judgement but a reconsideration.	We understand that current case law will not apply as the law will have been repealed and this is a new local discretionary scheme. We are focusing on making the right initial decision and not using resources from the fund to support a costly rejudgement process.
CAB	Will there be use of broadcast media for publicity? Equalities issues around knowledge and access.	No. Scheme will only be communicated through referral partners.
CAB	Fraud section should include recognition of ID fraud.	This will be recognised as fraud.
Strategic Commissioner & Coordinator (Substance Abuse)	Explicit reference to staying at a residential rehabilitation unit included?	No. They will be covered if their 'intended' address is Coventry.
Strategic Commissioner & Coordinator (Substance Abuse)	If additional needs are identified could they be referred to the floating support service we commission?	Yes - looking to refer if additional needs are identified.
Strategic Commissioner & Coordinator (Substance Abuse)	Align awards to objectives to recovery from drug/alcohol addiction	No, not possible to expand criteria as demand is likely to exceed resource. They will be able to access support to stay in community.
Recovery Partnership	Need to ensure 'legitimate uses' are still available under local provision. To support this funding may be better access by a professional/key worker to ensure legitimate application.	Yes. Happy to support this. Where details of an application can be verified it will be easier for officers to approve.

Organisation	Comment	Response
Swanswell	Need exists for furnishing new property to basis standards i.e. a bed, something to cook with and somewhere to sit are vital in helping people move away from chaotic lives. 3 groups of concern - those moving from chaotic lives to recovery, prison leaver and people escaping domestic violence.	Reflected in existing policy
Cyrenians Coventry Law Centre	People who have already made two crisis support applications are not generally to be eligible for a these. This is a drop from the current DWP ceiling of three crisis loans, which in itself could be considered arbitrary. Given the general atmosphere of hardship and rises in real poverty locally, would it be possible to reconsider this? Presumably a fairly stringent assessment process could still be out in place without a ceiling.	Additional applications will be considered in exceptional circumstances but generally is someone requires 2 or more awards in a year then this is an indicator that they need more holistic support. This is being treated as a fund of last resort that should signpost to relevant services in order to prevent multiple applications and reliance on the fund.
Cyrenians	Are there plans to include people with any career background other than military as a group highlighted for consideration for support?	No. This is a reflection of the Council's duty under the Covenant - applications will be considered on a persons circumstances rather the career background.
Coventry Law Centre	Under the current wording for the exceptional pressures criteria as single person would not be able to qualify as it states on page 9 3.1 e) that "a customer and their family", if this could be changed to customer, or/and their family. This would mean that a single person facing exceptional circumstances could qualify for a grant where in the current policy they would not.	Yes - altered policy as suggested
Coventry Law Centre	On page 11 bullet point 6 states that all income will be taken into account including DLA. Under legislation it is our understanding that the mobility component of DLA cannot be taken into account. This is under Social Security Contributions and Benefits Act 1992 Section 73 (14). "(14) A payment to or in respect of any person which is attributable to his entitlement to the mobility component, and the right to receive such a payment, shall (except in prescribed circumstances and for prescribed purposes) be disregarded in applying any enactment or instrument under which regard is to be had to a person's means."	Seeking advice on this

<u>Organisation</u>	<u>Comment</u>	<u>Response</u>
Coventry Law Centre	Contradictory between people in education not being eligible as they're not eligible to claim certain benefits but that full time students are excluded except in very limited circumstances.	This is a reference to the difference between Crisis Grant and Support Grant eligibility, and allows flexibility in case a student does have a disaster or a house fire and needs support.
Coventry Law Centre	One of the policy objectives is stated to be to alleviate poverty - unsure that this type of grant will achieve this objective. It also states to help those who are trying to help themselves - this would be difficult to achieve and seems judgemental.	Acknowledged. Will look to review policy objectives on an ongoing basis.
CAB	Will the criteria change throughout the year to manage the fund?	If it was outside the policy would have to seek member approval to do this.
THT	Will the CSG scheme pay for rent in advance?	No, covered by DHPs or DWP Budgeting Advances.
All	Should reviews not be carried out by an external party?	Unable to afford. Will look at expected scale of reviews [dependent on DWP providing current volume data] and look at what options there are available for third parties to be involved in reviews.
Coventry Refugee and Migrant Centre	Is the residency test defined by a length of time?	No
Jesus Centre Job Shop	How will organisations that promote independence but don't provide substantial levels of care support their clients to apply for the fund?	Covered in the category 'establishing themselves in the community'.