

Appendix C Crisis Grant and Home Emergency Grant Schemes Full Equality Impact Assessment



1. Introduction

- 1.1. This Full Equality Impact Assessment looks at the Council's proposals at establishing a Local Crisis Grant and Home Emergency Grant Scheme. It is based on primary research with members of the community. That research was conducted over a twelve week period by providing an on line questionnaire on the Council's website. In addition all community groups in the Borough registered with Bracknell Forest Voluntary Action were contacted for their views but unfortunately there were no responses to the consultation from those groups.
- 1.2. The report to the Council's Executive on the 4th September included an Equality Screening which concluded that there was a need to undertake a Full Impact Assessment. The online consultation opened on the 24th September and closed on the 9th December 12 weeks later.
- 1.3. Unfortunately the response to the consultation has been disappointing and as such limited conclusions can be drawn from the consultation. This was despite promotion of the consultation at both the Council's offices and the Department of Work and Pensions local offices which is where existing scheme customers would apply.

2. Background

- 2.1. The Welfare Reform Act has abolished Crisis Loans and Community Care Grants from 1st April 2013 to be replaced by a local scheme designed to meet local needs. The scheme will be funded by a grant from Government based on the Community Care Grant and Crisis Loan expenditure in Bracknell Forest in 2012/13 together with an Administrative Grant to run the scheme.
- 2.2. The low level of response to the questionnaire means that it is not possible to draw any conclusions in terms of impact on any of the equality groups. The equality group responses collected for each consultation question is included for the sake of completeness but not so as to provide an assessment of impact.
- 2.3. The consultation set 9 questionnaires which asked views on the main elements of the schemes. Each question response is reviewed in turn.

3. Should crisis loans only be available for households in an emergency?

- 3.1 The following table provides the responses for this question,

Do you agree that the Council's crisis loan scheme should only be available for households in an emergency?	Yes	No
	57%	43%

Of those who thought it should not be limited to emergency situations 50% were female and 50% male, 50% were aged 18-34 and 50% were aged 35-49 and all were of white British ethnic origin, all were Christian, there were no respondents who had a disability and one of those who thought no was bisexual.

4. Should all payments be means tested?

4.1 The following table provides the responses for this question,

Do you agree that payments should be means tested?	Yes	No
	86%	14%

There was only one person who disagreed who was male, aged 35-49, white British, not disabled, Christian and heterosexual.

5. Should all payments be based on current daily personal benefit allowances?

5.1 The following table provides the responses for this question,

Do you agree that the payments should be based on current daily personal benefit allowances?	Yes	No
	86%	14%

There was only one person who disagreed who was female, aged 18-34, white British, not disabled, Christian and heterosexual.

6. Do you agree payments should not be repaid?

6.1 The following table provides the responses to this question,

Do you agree payments should not be repaid?	Yes	No
	86%	14%

There was only one person who thought the payments should be repaid and they were female, aged 35-49, white British, not disabled, Christian and heterosexual.

7. Do you agree that a scheme should be established to provide goods to help set up home or due to an emergency?

7.1 The following table provides the response to this question.

Do you agree that a scheme should be established to provide goods to help set up home in an emergency?	Yes	No
	100%	0

The questionnaire then asked about a range of goods including bedding, basic cooking utensils, kettle, cooker fridge, washing machine table and chairs and basic floor covering and all respondents thought that these items should be provided where necessary.

8. Do you agree that where the costs exceed £500 they should be repaid at an affordable rate?

8.1 Responses to this question are shown in the following table:

Do you agree that where the costs exceed £500 they should be repaid at an affordable rate?	Yes	No
	72%	28%

There were two people who did not agree one was female aged 18-34 and one was male aged 35-49, neither had a disability, both were Christian and heterosexual.

9. Where possible do you agree second hand goods should be provided before new goods are provided?

9.1 The following table provides the responses to this question:

Where possible do you agree second hand goods should be provided before new goods are provided?	Yes	No
	86%	14%

The person who disagreed was female, aged 18-34, white British, did not have a disability was Christian and heterosexual.

10. Do you think there should be an appeals process or the council's complaints process used?

10.1 Only three respondents replied to this question all in favour.

11. Do you think claims should be limited to one per year except in exceptional circumstances?

11.1 The following table shows the results for this question:

Do you think claims should be limited to one per year except in exceptional circumstances?	Yes	No
	86%	14%

The person who disagreed was female, aged 18-34, white British, did not have a disability was Christian and heterosexual.

There were some general comments provided on the impact of making the grants into loans as it was thought that would increase the propensity of vulnerable households to enter into debt.

12. Publication of Equality Impact Assessment

12.1 The Freedom of Information Act 2000 aims to make public authorities more transparent, accountable and increase public debate and involvement. All completed EIAs are published. They can be found at:
<http://www.bracknell-forest.gov.uk/equalityimpactassessmentsatoc>

13. Conclusions

- 13.1. The level of response to the consultation does not allow for any meaningful conclusions to be drawn. However, the only question which was not overwhelmingly supported was the proposal that crisis grants should only be available for emergency situations. Although it is intended that crisis grants are provided for unforeseen situations home emergency grants will enable households setting up home for the first time to receive some support. There was also concern about the repayment of grants

14. Mitigation

- 14.1. The proposed crisis grants are repayable where they will generate financial advantage for a household such as allowing switching utility providers to cheaper suppliers. The use of the Council's Rent in Advance and Deposit Loan Fund which will be repayable will be the same as the repayments required for crisis grants when Rent in Advance Loans were made under the national scheme. Therefore, there is no change in that respect.
- 14.2. The local scheme will fund crisis grants for unexpected situations that arise causing financial hardship. Where households are unable to budget within their available income a crisis grant will not be available. However, advice will be provided to households in those circumstances about financial management and ways to reduce their living costs to an affordable level. This advice will be provided by the Council or via external agencies. There may be occasions where it is cost effective to make grants to households to enable them to regularise their financial circumstances and enable a reduction in their living costs so that they can repay the grant and the proposed scheme makes provision for that.
- 14.3. A monitoring system that captures the award of grant and records the household characteristics in terms of the equality groups will be set up. This will allow the scheme to be reviewed and any potential adverse impact identified and addressed.

Equalities Screening Record Form

Date of Screening: Please add	Directorate: Adult Social Care, Health & Housing		Section: Housing
1. Activity to be assessed	Provision of local crisis loan and community care grant scheme		
2. What is the activity?	<input checked="" type="checkbox"/> Policy/strategy <input type="checkbox"/> Function/procedure <input type="checkbox"/> Project <input type="checkbox"/> Review <input checked="" type="checkbox"/> Service <input type="checkbox"/> Organisational change		
3. Is it a new or existing activity?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Existing		
4. Officer responsible for the screening	Simon Hendey		
5. Who are the members of the EIA team?	Shanaz Alam		
6. What is the purpose of the activity?	Provision of financial support and replacement of household goods on a means tested basis as a consequence of an emergency or disaster situation		
7. Who is the activity designed to benefit/target?	Residents of Bracknell Forest who do not have the financial means to meet their immediate needs due to an emergency or disaster		
Protected Characteristics	Please tick yes or no	Is there an impact? What kind of equality impact may there be? Is the impact positive or adverse or is there a potential for both? If the impact is neutral please give a reason.	What evidence do you have to support this? E.g. equality monitoring data, consultation results, customer satisfaction information etc Please add a narrative to justify your claims around impacts and describe the analysis and interpretation of evidence to support your conclusion as this will inform members decision making, include consultation results/satisfaction information/equality monitoring data
8. Disability Equality	Y	National data suggests the existing scheme has similar success rates for disabled as non-disabled households.	National data provided by the DWP shows that 31% of crisis loans were made to households who were disabled and 33% of community care grants were made to disabled households.
9. Racial equality	Y	National data suggests that the success rate for application for crisis loans and community care grants is lower for ethnic minority group residents.	The national data on application and success is provided in the DWP impact assessment at the end of this screening
10. Gender equality		N	Information from the national scheme as shown in the DWP impact assessment suggests there is no difference in the success rates for application for crisis loans between
			The national data on application and success is provided in the DWP impact assessment at the end of this screening

			male and female applicants. The DWP impact assessment contends that there is no reason to believe that local schemes should generate a differential impact as eligibility is similar.	
11. Sexual orientation equality		N	There is nothing to suggest that a local scheme would generate differential impact for residents based on sexual orientation at this time. Neutral impact.	There is no national data on the crisis loan and community care grants that monitors application and success by sexual orientation
12. Gender re-assignment		N	There is nothing to suggest that a local scheme would generate differential impact at this time for residents based on gender re-assignment. Neutral impact.	There is no national data on the crisis loan and community care grants that monitors application and success by gender re-assignment
13. Age equality	Y		Data from the national scheme suggests that younger people are positively impacted and older people disadvantaged in application and success rates for crisis loans. The opposite has been found to be the case for community care grants	The national data on application and success is provided in the DWP impact assessment at the end of this screening
14. Religion and belief equality		N	There is nothing to suggest that a local scheme would generate differential impact at this time for residents based on religion or belief. Neutral impact.	There is no national data on the crisis loan and community care grants that monitors application and success by religion or belief
15. Pregnancy and maternity equality		N	There is nothing to suggest that a local scheme would generate differential impact at this time for residents based on pregnancy and maternity. Neutral impact.	There is no national data on the crisis loan and community care grants that monitors application and success by pregnancy and maternity
16. Marriage and civil partnership equality		N	There is nothing to suggest that a local scheme would generate differential impact at this time for residents based on marriage and civil partnerships. Neutral impact.	There is no national data on the crisis loan and community care grants that monitors application and success by resident's marriage or civil partnership status.
17. Please give details of any other potential impacts on any other group (e.g. those on lower incomes/carer's/ex-offenders) and on promoting good community relations.	The purpose of the local scheme is to provide emergency financial support or goods to set up home to vulnerable and or low income households. Therefore, the aim of the scheme is to provide a positive impact for those groups.			
18. If an adverse/negative impact has been identified can it be justified on grounds of promoting equality of opportunity for one group or for any other reason?				

19. If there is any difference in the impact of the activity when considered for each of the equality groups listed in 8 – 14 above; how significant is the difference in terms of its nature and the number of people likely to be affected?	At present there is only national data to draw upon in relation to the operation of the national crisis loan and community care grant scheme. Consultation at a local level will be necessary to identify the specific issues that exist for the equality groups in Bracknell Forest. Thus the construction of the local scheme will address the issues identified via consultation. We will be mindful of the issues identified nationally in terms of lower levels of take up by minority ethnic groups of both schemes and the take up rates for older people and younger people respectively.		
20. Could the impact constitute unlawful discrimination in relation to any of the Equality Duties?		N	At this stage the basis of the local scheme is being subjected to consultation so as to identify the local issues and needs that should be addressed in the construction of the final scheme
21. What further information or data is required to better understand the impact? Where and how can that information be obtained?	It will be necessary to undertake detailed and targeted consultation with community and voluntary sector groups who can speak on behalf of the equality groups to better understand the potential impact of the proposals in Bracknell Forest. This will be achieved via correspondence and meetings where requested. In addition consultation will take place with the wider community. The consultation will take place over a twelve week period to enable the widest opportunity for views of potential impact to be ascertained.		
22. On the basis of sections 7 – 17 above is a full impact assessment required?	Y		As no local information exists on the impact of a proposed scheme it is recommended that full consultation takes place to assess the impact of proposals.
23. If a full impact assessment is not required; what actions will you take to reduce or remove any potential differential/adverse impact, to further promote equality of opportunity through this activity or to obtain further information or data? Please complete the action plan in full, adding more rows as needed.			
Action	Timescale	Person Responsible	Milestone/Success Criteria
24. Which service, business or work plan will these actions be included in?			
25. Please list the current actions undertaken to advance equality or examples of good practice identified as part of the screening?			
26. Chief Officers signature.	Signature: Simon Hendey 2012		Date: August