

# Equality Impact Assessment Template – Policy, function or strategy

This document should be completed when a new policy, function or strategy is introduced or when a substantive change to an existing policy, function or strategy is recommended.

<b>1. Policy, function or strategy</b>		
a.	Name/description of the policy, function or strategy <sup>1</sup>	Temporary revision to the Discretionary Housing Payment (DHP) Policy
b.	Responsible organisation(s)/Lead Service	Inverclyde Council/Finance Services
c.	Lead Officer	Tracy Bunton, Revenues and Benefits Manager
d.	Date of Impact Assessment	24 <sup>th</sup> October 2023
e.	Partners/other Services involved in the development of the policy, function or strategy	Scottish Government, Department for Work and Pensions
f.	Is the policy, function or strategy?	<input type="checkbox"/> New
		<input checked="" type="checkbox"/> Reviewed/Revised
g.	What is the purpose of the policy, function or strategy (include details of any new legislation which prompted the introduction of the policy, function or strategy or the substantive change to the policy, function or strategy)?	DHP is an extra payment made to help meet the shortfall between Housing Benefit or the housing cost element of Universal Credit and an applicant’s rent. The DHP policy requires a means test to be carried out in all circumstances other than two specific areas which are funded in full by the Scottish Government. The change to the policy increases the excess income threshold to £60 per week for a temporary period until 31 <sup>st</sup> March 2024.
h.	What are the intended outcomes of the policy, function or strategy?	More applicants will qualify for the payment.

<sup>1</sup> Please attach details of the policy, function or strategy to this Template

Classification : Official

i.	Geographical area (Inverclyde-wide or a specific location)	Inverclyde-wide	
j.	Which parts of the Equality Duty will the policy, function or strategy impact on?	<input type="checkbox"/>	Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by The Equality Act 2010
		X	Advance equality of opportunity between people of different groups
		<input type="checkbox"/>	Foster good relations between people from different groups
k.	Will those who may be directly or indirectly affected by the policy, function or strategy be involved in its development?	No	

<b>2. Does the policy, function or strategy impact on:</b>		
	<b>Yes</b>	<b>No</b>
a. Protected Characteristics under The Equality Act 2010: Age; Care experienced; Disability; Gender Reassignment; Marriage and Civil Partnership; Pregnancy and Maternity; Race; Religion and Belief; Sex; Sexual Orientation <b>(see Section 3)</b>	X	
b. Reducing inequalities of outcome caused by socio-economic disadvantage – Fairer Scotland Duty <sup>2</sup> <b>(see Section 6)</b>	X	
c. Inverclyde Alliance Partnership Plan 2023/33 <sup>3</sup> <b>(see Section 7)</b>	X	

<sup>2</sup> [Fairer Scotland Duty: guidance for public bodies](#)

<sup>3</sup> [Inverclyde Alliance Partnership Plan 2023/33](#)

d. Council Plan 2023/28 <sup>4</sup> (see Section 8)	X	
<b>3. If 'Yes' is selected for any part of Section 2, please populate the other relevant Sections of this Template.</b>		
<b>4. If 'No' is selected for <u>every part</u> of Section 2, please state the reasons for this.</b>		
<p>Please sign below and email a copy of this Template to Karen Barclay, Corporate Policy and Performance Officer:  <u><a href="mailto:karen.barclay@inverclyde.gov.uk">karen.barclay@inverclyde.gov.uk</a></u></p>		
Signature:	Date:	

<b>3. Impact – Protected Characteristics</b>						
<b>Which of the Protected Characteristics will the policy, function or strategy have an impact upon?</b>						
	<b>Impact</b>					
Protected Characteristic	Positive		Neutral	Negative		Reasons/Comments
	High	Low		High	Low	
Age		X				The majority of older people in Inverclyde experience socio-economic disadvantage.

<sup>4</sup> [Council Plan 2023/28](#)

Classification : Official

Care experienced		X				Care experienced people are more likely to have grown up in poverty. A proportion of service leavers lack experience of navigating housing and welfare benefit services.
Disability		X				Those most reliant on welfare benefits in Inverclyde include those with disabilities related to physical and mental health.
Gender Reassignment			X			
Marriage and Civil Partnership			X			
Pregnancy and Maternity		X				Pregnancy is one of the key triggers that increase the risk of women living in poverty, particularly where they are lone parents.
Race		X				People from non-white minority ethnic groups are more likely to be in relative poverty compared to those from 'White - British' and 'White - Other' groups.
Religion and Belief		X				There are links between the prevalence of certain religions and the population of deprived areas.
Sex		X				Those most reliant on welfare benefits in Inverclyde include women, families with children.
Sexual Orientation			X			
Other groups to consider <ul style="list-style-type: none"> <li>Carers</li> </ul>		X				Informal carers are more likely to live in poverty than those without caring responsibilities. Members of the Armed Forces community who receive help with housing costs may be eligible.

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<ul style="list-style-type: none"> <li>• The Armed Forces Covenant Duty</li> </ul>		X				<p>Housing providers whose tenants meet the new qualifying criteria may benefit from rent arrears being accumulated.</p>
<ul style="list-style-type: none"> <li>• Registered Social Landlords and Private Sector Landlords</li> </ul>		X				

<p><b>4. Which parts of the Equality Duty will the policy, function or strategy have an impact upon?</b></p>	
<input type="checkbox"/>	<p>Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by The Equality Act 2010</p>
<p>X</p>	<p>Advance equality of opportunity between people from different groups</p>
<input type="checkbox"/>	<p>Foster good relations between people from different groups</p>

**5. Impact – Groups**

From the information you have highlighted above, describe the positive and negative impacts and the groups affected under The Equality Act 2010.

**Positive impact**

+

*(Describe groups affected.)*

Age: The majority of older people in Inverclyde experience socio-economic disadvantage.

Care experienced: Care experienced people are more likely to have grown up in poverty. A proportion of service leavers lack experience of navigating housing and welfare benefit services.

Disability; Sex: Those most reliant on welfare benefits in Inverclyde include women, families with children and those with disabilities related to physical and mental health.

Pregnancy and Maternity: Pregnancy is one of the key triggers that increase the risk of women living in poverty, particularly where they are lone parents.

Race: People from minority ethnic backgrounds in Scotland are at a significantly higher risk of poverty.

Religion and Belief: There are links between the prevalence of certain religions and the population of deprived areas.

**Negative impact**

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*(Describe groups affected.)*

<p><u>Carers</u>: Informal carers are more likely to live in poverty than those without caring responsibilities.</p>	
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**6. Impact – Fairer Scotland Duty**

What impact will the policy, function or strategy have on reducing inequalities of outcome caused by socio-economic disadvantage?

<p><b>Positive impact</b> +</p>	<p><b>Neutral impact</b> =</p>	<p><b>Negative impact</b> -</p>
<p>X</p>		

**Briefly describe how the policy, function or strategy will impact on reducing inequalities of outcome.**

The temporary change to the policy, increasing the excess income threshold to £60 per week, will extend financial support to low income households who did not qualify under the tighter conditions of the previous policy.

**7. Impact – Inverclyde Alliance Partnership Plan 2023/33**

Which Themes from the Inverclyde Alliance Partnership Plan 2023/33 will the policy, function or strategy impact on?

<p><input type="checkbox"/></p>	<p><b>Theme 1: Empowered people</b></p> <ul style="list-style-type: none"> <li>• Communities can have their voices heard, and influence the places and services that affect them</li> <li>• Gaps in outcomes linked to poverty are reduced</li> </ul>
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<input type="checkbox"/>	<b>Theme 2: Working people</b> <ul style="list-style-type: none"><li>• More people will be in sustained employment, with fair pay and conditions</li><li>• Poverty related gaps are addressed, so young people can have the skills for learning, life and work</li><li>• Businesses are supported and encouraged to reduce their carbon footprint and develop green jobs</li></ul>
<input type="checkbox"/>	<b>Theme 3: Healthy people and places</b> <ul style="list-style-type: none"><li>• People live longer and healthier lives</li><li>• Supportive systems are in place to prevent alcohol and drug misuse</li><li>• Our natural capital is looked after, and we are effectively adapting and mitigating the effects of climate change</li></ul>
<input checked="" type="checkbox"/>	<b>Theme 4: A supportive place</b> <ul style="list-style-type: none"><li>• Vulnerable adults and children are protected and supported, ensuring they can live safely and independently</li><li>• We recognise where people are affected by trauma, and respond in ways that prevent further harm and support recovery</li><li>• Public protection and community safety are improved through targeting our resources to reduce the risk of offending and harm</li></ul>
<input type="checkbox"/>	<b>Theme 5: A thriving place</b> <ul style="list-style-type: none"><li>• Growth in our working age population by encouraging people to stay here, and attracting new people to settle here</li><li>• Development of strong community-based services that respond to local need</li><li>• Homes are energy efficient and fuel poverty is reduced</li><li>• Increased use of active travel and sustainable transport options</li><li>• Easy access to attractive and safe public spaces, and high-quality arts and cultural opportunities</li></ul>

**Briefly describe how the policy, function or strategy will impact on the Inverclyde Alliance Partnership Plan 2023/22 Themes.**

Theme 4: Additional vulnerable members of our communities will receive supplementary payments toward their rent, assisting the security of their tenancies.



**8. Impact – Council Plan 2023/28**

**Which Themes from the Council Plan 2023/28 will the policy, function or strategy impact on?**

<input checked="" type="checkbox"/>	<p><b>Theme 1: People</b></p> <ul style="list-style-type: none"><li>• Our young people have the best start in life through high quality support and education</li><li>• Gaps in outcomes linked to poverty are reduced</li><li>• People are supported to improve their health and wellbeing</li><li>• More people will be in employment, with fair pay and conditions</li><li>• Our most vulnerable families and residents are safeguarded and supported</li></ul>
<input type="checkbox"/>	<p><b>Theme 2: Place</b></p> <ul style="list-style-type: none"><li>• Communities are thriving, growing and sustainable</li><li>• Our strategic housing function is robust</li><li>• Our economy and skills base are developed</li><li>• We have a sufficient supply of business premises</li><li>• Our natural environment is protected</li></ul>
<input type="checkbox"/>	<p><b>Theme 3: Performance</b></p> <ul style="list-style-type: none"><li>• High quality and innovative services are provided, giving value for money</li><li>• Our employees are supported and developed</li></ul>

**Briefly describe how the policy, function or strategy will impact on the Council Plan 2023/28 Themes.**

Theme 1: Additional vulnerable members of our communities will receive supplementary payments toward their rent, assisting the security of their tenancies.

**9. Evidence**

What evidence do you have to help identify any potential impacts of the policy, function or strategy?

Note: Evidence could include information from consultations, surveys, the Citizens’ Panel, focus groups, interviews, projects, user feedback, complaints, Officers’ knowledge and experience, equalities monitoring data, publications, research, reports, and local and national groups.

<b>Evidence</b>	<b>Details</b>
Consultation/engagement (including any carried out while developing the policy, function or strategy)	
Research	<p>DHP application and expenditure data. Joseph Rowntree Foundation, January 2022, <i>UK Poverty 2022</i> tells us about how those with caring responsibilities are more likely to live in poverty than those without, affecting more working age people than pension age counterparts.</p> <p>Joseph Rowntree Foundation, October 2021, <i>Ethnicity, poverty and the data in Scotland</i> tells how people from minority ethnic backgrounds in Scotland are at a significantly higher risk of poverty.</p> <p>Scottish Government, April 2013, <i>Scottish Government Equality Outcomes: Pregnancy and Maternity Evidence Review</i> tells us that pregnancy is one of the key triggers that increase the risk of women living in poverty, particularly where they are lone parents.</p> <p>Scottish Government, April 2013, <i>Scottish Government Equality Outcomes: Religion and Belief Evidence Review</i> tells us that there are links between the prevalence of certain religions and the population of deprived areas.</p> <p>Independent Care Review, <i>The Promise</i> tells us that care experienced people are more likely to have grown up in poverty.</p>

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Officers' knowledge and experience (including feedback from frontline staff)	Officers' Benefit service delivery experience.
Equalities monitoring data	The number of households who qualified under the current policy was 207 The revised policy will bring in a further 20 households
User feedback (including complaints)	
Stakeholders  Other	Scottish Government – provision of the allocation of core funding and Statutory Guidance.
Are there information gaps and, if so, what are these?	

## 10. Consequences of Analysis

What steps will you take in response to the findings of your analysis? Please select at least one of the following and provide a brief explanation.

a.	Continue development with no changes	<input checked="" type="checkbox"/>	
b.	Continue development with minor alterations	<input type="checkbox"/>	
c.	Continue development with major changes	<input type="checkbox"/>	

d.	Discontinue development and consider alternatives (where relevant)	<input type="checkbox"/>	
<p>How will the effect of the policy, function or strategy be monitored following implementation?</p> <p>Budget expenditure will be monitored by Finance Services each month.</p>			
<p>When is the policy, function or strategy due to be implemented?</p> <p>November 2023.</p>			
<p>When will the policy, function or strategy be reviewed?</p> <p>The intention is to introduce the amendment to the policy on a temporary basis until 31<sup>st</sup> March 2024, reverting to the current thresholds from 1<sup>st</sup> April 2024. In year expenditure will be monitored closely and could be subject to review depending on the level of spend. The policy taking effect from 1<sup>st</sup> April 2024 will be reviewed when the Scottish Government 2024/25 DHP allocation is known, expected early in 2024.</p>			
<p>What resources are available for the implementation of the policy, function or strategy? Have these resources changed?</p> <p>Existing resources will be used to implement the amended policy. There is no change to the resource allocation.</p>			

**11. Please use the space below to detail any other matters arising from the Equality Impact Assessment process, including what action could be taken to mitigate the impact of the policy, function or strategy.**

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The policy amendment benefits the community therefore no mitigation is needed.

<b>Details of the Person(s) who completed the Assessment:</b>	
Name:	Tracy Bunton
Position:	Revenues and Benefits Manager
Date:	24 <sup>th</sup> October 2023
<b>Authorised by:</b>	
Name:	Alan Puckrin
Position:	Chief Financial Officer
Date:	24 <sup>th</sup> October 2023

Please send a copy of the completed Template to Karen Barclay, Corporate Policy and Performance Officer at [karen.barclay@inverclyde.gov.uk](mailto:karen.barclay@inverclyde.gov.uk).