

#### **AGENDA ITEM NO: 6**

Report To: Policy & Resources Committee Date: 14 November 2017

Report By: Chief Financial Report No: FIN/91/17/AP/LA

Officer/Corporate Director (Chief Officer), Inverclyde Health & Social Care Partnership

Contact Officer: Alan Puckrin Contact No: 01475 712223

Subject: Welfare Reforms Update

#### 1.0 PURPOSE

1.1 The purpose of this report is to provide the Committee with an update on the impact on the Council of the ongoing Welfare Reform changes.

#### 2.0 SUMMARY

- 2.1 Universal Credit Full Service was implemented within Inverclyde on 23 November 2016. A Delivery Partnership Agreement has been agreed with the DWP and the Council is receiving payment for services provided. There were 3761 UC Full Service claimants at the middle of September. Numbers transferring to UC are slowing down and the next major increase in numbers is not estimated to occur until 2019/20 at the earliest when the working age caseload transfers.
- 2.2 Officers in Finance and HSCP continue to work with Partners and the local DWP officers to manage the various issues which are arising from the requirements of Universal Credit and this is being monitored via the Welfare Reforms Board. Officers are keeping in regular contact with Cosla and other UC Full Service Councils whilst collectively lobbying DWP for changes.
- 2.3 Demand for Crisis Grants is growing as Universal Credit is rolled out with payments between April and September being 37% higher than the position 12 months ago. The Council has allocated an extra £100,000 to meet this growing demand. It is anticipated that a large part of this will be needed in 2017/18.
- 2.4 The successful Inverclyde Financial Inclusion Partnership funding bid for approximately £2.35 million over 2017/20 from the Big Lottery and ESF is being implemented with a lead Project Officer appointed and legal agreements in place. Meanwhile, following agreement to allocate a further years funding to several initiatives at the last Committee, officers are assessing the impact of other funded initiatives and will make recommendations in this regard to the next Committee.
- 2.5 The Department of Work and Pensions closed the Port Glasgow Jobcentre Plus on 30 October. An appointment only facility is being operated on 2 half days per week from 7 ½ John Wood Street and the impact of this will be monitored and reported to Committee.

## 3.0 RECOMMENDATIONS

3.1 It is recommended that the Committee notes the ongoing impacts and actions being taken by officers in respect of the implementation of Welfare Reforms within Inverclyde.

Alan Puckrin Chief Financial Officer Louise Long Chief Officer (HSCP)

#### 4.0 BACKGROUND

- 4.1 The Committee receives a report each cycle providing updates on the Council's response to the major Welfare Reform changes being rolled out across the UK. The Council set aside extra funding to meet the significant financial challenges generated by these changes.
- 4.2 Universal Credit Full Service (UCFS) launched in Inverclyde on 23 November 2016. The removal of eligibility criteria means that all working age welfare benefit claimants who make a new claim or have a relevant change in their circumstances will claim Universal Credit (UC) for themselves and their family instead of claiming Job Seekers Allowance, Employment and Support Allowance, Housing Benefit, Income Support and Tax Credits. As noted in previous reports UCFS is almost entirely online with claimants being required to apply, maintain their claim, record work search activity, receive correspondence from the DWP, stay in touch and reply to messages sent by their work coach.

#### 5.0 UNIVERSAL CREDIT

- 5.1 Universal Credit claim uptake continues although at a slower pace. By the middle of September 2017, 3761 people In Inverclyde were in receipt of the benefit with 32% having earnings included in the latest assessment of their claim. 1341 housing association tenants receive help with their rent payments through UC and this is reflected in the Housing Benefit caseload where there has been a reduction of 26% in working age claimants since April 2016. Appendix 1 provides more detail. DWP are engaged locally with HSCP and a number of specialist providers to assist claimants and employers.
- 5.2 The level of demand from UC claimants for help to make online claims is around the level expected by the DWP with 227 customers having been supported by Future Skills on behalf of the Council in the 6 months to September 2017 and others being helped by their Housing Association.
- 5.3 Port Glasgow Jobcentre Plus services will relocate to Greenock by 30October 2017. Port Glasgow customers will be informed of the new office through their UC online journal. Outreach provision of the full range of JCP services for the most vulnerable customers will be provided by appointment twice each week at 7 ½ John Wood Street, Port Glasgow. Work Coaches will identify those who would benefit from this provision. Demand for the service will be monitored.
- 5.4 An additional HSCP Money Advisor has been appointed to support Homelessness service users who require intense support with UC. Plans are progressing with DWP to locate a work coach in collaboration with other partners within the Homelessness service to support service users maintain the responsibilities of their claimant commitment.
- 5.5 Very few UC claimants have agreed to the offer of Budgeting Support services despite evidence of many struggling to manage their monthly UC payments. Although not entirely attributed to money management problems, Housing Associations report increasing rent arrears and the Council has approved 749 Crisis Grant to UC claimants since April 2017. Officers are in the process of developing alternative referral and delivery methods to improve budgeting support take-up.
- 5.6 Universal Credit Scottish flexibilities were introduced from the beginning of October and will be offered to new UC claimants. Those who have claimed UC since 4 October 2017 will be offered the choice of having their UC paid twice each month and they will have the choice of having the housing element of their UC award paid directly to their housing association or landlord. These flexibilities will be offered in the second month of the UC claim. It is acknowledged that this will not address the 6 week delay until the first payment is received. The Scottish Government produced a leaflet explaining the choices and states that claimants in receipt of UC before October 2017 will be able to access the Scottish Flexibilities from January 2018. The official DWP position however is that the date is still under discussion with no timescale agreed. The leaflet is attached as Appendix 2.

5.7 COSLA collated data from the UC Full Service councils in response to Housing Benefit administration grant cuts and included this in a report with rent arrears data from council housing services to the DWP UC Programme Director General. The additional administration costs associated with UC on the continuing delivery of Housing Benefit, Council Tax Reduction, Discretionary Housing Payment and Scottish Welfare Fund in Inverclyde during 2016/17 (November 2016 – March 2017) amounted to £53,278.

#### 6.0 DISCRETIONARY HOUSING PAYMENTS AND SCOTTISH WELFARE FUND

- 6.1 Appendix 3 shows that £937,400 Discretionary Housing Payment has been awarded or has been committed to be paid to those whose Housing Benefit or Universal Credit had been reduced by the SSSC. 98.4% of Housing Benefit restrictions have been mitigated by DHP and officers continue to work closely with Housing Associations who support their tenants to apply. The implementation of the removal of the restriction by way of Universal Credit Scottish flexibilities is still to be announced.
- 6.2 Homelessness Service users whose help with housing costs through UC is paid at the same rate as those living in mainstream housing have been assisted up to September 2017 by DHP amounting to £65,600. No specific funding is received by the Council to meet this cost. Projected demand to year end of a further £68,700 together with payment to other claimants who need assistance with housing costs, affected by the Benefits Cap and those coping with financial hardship for other reasons, will exceed the budget of £164,500 by around £40,000.
- 6.3 Greater demand is being placed on the Scottish Welfare Fund with 24% more Crisis Grants being approved and an increase in expenditure of 37% compared with the same period last year. Community Care Grants are comparable with 2016/17. Appendix 4 shows that on average, 220 applicants each month received Crisis Grants of £99.21 and 88 applicants each month received Community Care grants of £516. Scottish Welfare Fund expenditure exceeds the Scottish Government allocation by 19% but remains within budget due to the allocation of £100,000 from the Welfare Reform recurring budget and a residual underspend from previous years of £60,000.
- 6.4 The Scottish Welfare Fund has not as yet been required to mitigate the removal of the Universal Credit housing element from those aged 18 to 21 years who do not meet exemption criteria.

#### 7.0 OTHER WELFARE REFORM MATTERS

- 7.1 Where a household has more than two children at the point of a new claim, support has been capped since April 2017 at the 2 child entitlement rate unless the circumstances meet certain exemption criteria.
- 7.2 As an interim arrangement until November 2018, instead of claiming Universal Credit, claims will revert to "legacy" benefits such as Housing Benefit and Tax Credits. 22 Housing Benefit claims have been made in these circumstances.
- 7.3 There is an impact on the Homelessness Budget arising from the implementation of Universal Credit Full Service due to the significant reduction in the amount of support provided for Housing costs within UC compared to Housing Benefit. Within the Inverclyde Centre the difference is £150-170/week per claimant. Over 80% of the Inverclyde Centre properties are currently occupied by UC claimants. The shortfall in Housing income can be made up from the Discretionary Housing Payments and as a result the Committee allocated £200,000 on a one off basis from the Anti-Poverty Fund the meet any costs which cannot be contained within the DHP Budget.

#### 8.0 EXTERNAL FUNDED PROJECTS

- 8.1 Previous reports to the Committee have highlighted a range of issues clients are reporting related to the introduction of, and migration from, Disability Living Allowance (DLA) to Personal Independence Payment (PIP). One of the main issues is the need to travel to Glasgow for assessment. A previous Health and Social Care Committee requested a formal response from DWP in relation to the use of Duff Street Greenock, the home visiting service and also the proposal that Inverclyde conducts its own Personal Independence Payment (PIP) assessments on behalf of DWP. The DWP have now responded to this request explaining that Duff Street cannot be used for Personal Independence Payment (PIP) assessments and that Inverclyde Council/HSCP cannot undertake assessments as the current providers have been awarded through a contracting process. DWP also advises that it has a clear set of requirements on the professions, skills, experience and training of the health professionals and approval for a health professional must be conferred by the DWP Chief Medical Officer on behalf of the Secretary of State for Work and Pensions.. The full report regarding this is at Appendix 5.
- 8.2 This Council led programme funded by Big Lottery and European Social Fund to increase the financial capacity and improve the social inclusion of the most disadvantaged individuals and households in Inverclyde is now up and running. All staff are in place within HSCP Advice Services; Community learning and Development; Barnardo's; CVS Inverclyde; Financial Fitness; River Clyde Homes; Scotcash and The Wise Group are starting to support clients. Leaflets, posters and an advertising campaign, targeted at the individuals the programme can support, are in development and information can be sought from any of the organisations involved or through the Advice First line on 01475 715299.
- 8.3 Discussions are ongoing with Future Skills (RCH); IHeat; CVS Inverclyde and Education colleagues regarding the Inversavers project with Tail o the Bank Credit Union regarding their current funding from the Anti Poverty Fund which is in place until March 2019. This will be the subject of a further to the February 2018 committee with recommendations for future spend

#### 9.0 DEVOLUTION OF SOCIAL SECURITY

- 9.1 The timescales for the delivery of the devolved responsibilities by the SSSA will begin with the top up to Carers Allowance from summer 2018, Best Start Allowance then Funeral payments during 2019 with a phased roll out of the remaining benefits for full implementation by 2021.
- 9.2 Scottish Social Security Agency staff will be employed locally and will work within every local authority area; recruitment is likely to begin in 2019. Rather than replace local delivery arrangements Scottish Government officials wish to build on what already exists through augmentation and support and acknowledge that partnership arrangements will be key to the new arrangements. Scottish Government Officers visited Inverclyde at the end of September to meet the Welfare Reform Project Board to learn about operational delivery arrangements in Inverclyde and after a positive meeting gave an undertaking to meet again in the near future.

#### 10.0 IMPLICATIONS

#### 10.1 Finance

As detailed in the report.

Financial Implications:

#### One off Cost

Cost Centre	Budget Heading	Budget Years	Proposed Spend this Report £000	Virement From	Other Comments
N/A					

Annually Recurring Costs/ (Savings)

Cost Centre	Budget Heading	With Effect from	Annual Net Impact £000	Virement From (If Applicable)	Other Comments
N/A					

# 10.2 **Legal**

There are no legal implications arising from this report.

#### 10.3 Human Resources

There are no HR implications arising from this report.

# 10.4 Equalities

Has a	n Equa	lity Impact Assessment been carried out?
	Yes	See attached appendix
Х	No	This report does not introduce a new policy, function or strategy or recommend a change to an existing policy, function or strategy. Therefore, no Equality Impact Assessment is required.

# 10.5 Repopulation

There are no repopulation implications arising from this report.

# 11.0 LIST OF BACKGROUND PAPERS

## 11.1 None.

# Appendix 1

# Universal Credit - Inverclyde Council

	No. of UC claimants	% of UC claimants with earnings	No. of UC claimants with Council Tax Reduction	No. of UC claimants awarded SWF Crisis Grants
Feb-17	1466	27%	647	128
Mar-17	1960	28%	883	125
Apr-17	2576	31%	1019	118
May-17	2908	29%	1159	135
Jun-17	3169	29%	1256	134
Jul-17	3470	31%	1358	109
Aug-17	3582	31%	1498	119
Sep-17	3761	32%	1581	134

# Notes

<sup>1.</sup> Caseload is the number of individuals in receipt of Universal Credit either individually or as part of a couple

# Universal Credit: New choices for people living in Scotland

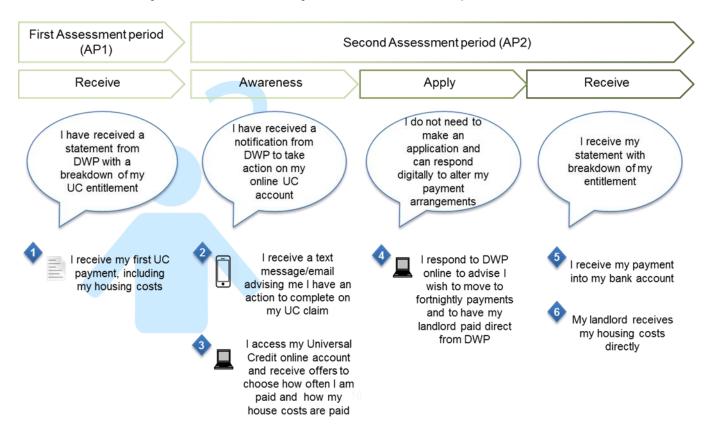
- Q. What are the new Universal Credit choices for people living in Scotland?
- A. People claiming Universal Credit and living in Scotland can choose to:
  - be paid either monthly or twice monthly; and
  - have the housing costs in their award of Universal Credit paid direct to their landlord.
- Q. Who is eligible for the new Universal Credit choices?
- A. Anyone making a new Universal Credit claim in Scotland on or after 4 October 2017, who lives in an area where the full Universal Credit service is operating. Full service claimants are those who make and maintain their claim online. Please use this link to determine areas where full service is in operation
- Q. I am already getting Universal Credit when can I take up the new choices?
- A. The new Universal Credit choices will be available from early January 2018 to existing Universal Credit claimants in full service areas who applied before 4 October. You can keep updated on progress at the Scottish Government website.

If you are already getting Universal Credit and live in an area where the full Universal Credit service has not started, then you will not be able to take up the new choices until you transfer to the full service, and make and maintain your claim online.



# Q. How do I make the new Universal Credit choices?

A. If you are eligible, you will be offered the new Universal Credit choices through your Universal Credit online account. You will be offered them following your first payment. The offer will include further details about the choices you have and how you can take them up.



Q. Can I take up the new Universal Credit choices if I am already on an Alternative Payment Arrangement (APA) or Managed Payment to Landlord (i.e. my rent is already being paid direct to my landlord)

A. No, although Alternative Payment Arrangements are time limited with the DWP intention that you will be paid monthly and manage your finances after a period of time. You may be able to take up the new Universal Credit choices when your Alternative Payment Arrangements ends and you should check with the DWP at that time.

Q. What is the twice monthly payment?

A. At the moment you get your Universal Credit as a single payment, once a month.

You will now be able to choose to have your Universal Credit payment split in half and paid twice a month, or roughly every fortnight. You will get the same amount overall.

However, you will only be paid half the monthly amount in your first twice monthly payment, receiving the other half in your next payment. You need to consider whether you will be able to manage your bills and expenses in this period.

If you need budgeting or money advice, you can get help from your Citizens Advice Scotland, Money Advice Services and others.

You can also get an advance on your Universal Credit payment if you are in urgent financial need and should contact the DWP service centre or local Jobcentre Plus to discuss.

- Q. What happens once I choose a twice monthly payment?
- A. You don't need to do anything. The DWP will process your request.
- Q. How often will I receive my money if I choose the twice monthly payment?
- A. You will be advised by the DWP online when your first half payment is due. If you chose twice-monthly payments, but not direct payment of your housing costs to your landlord, you will need to ensure that you budget adequately so you have enough money to pay your rent at the end of the month. Failure to do so will build up rent arrears which could result in your landlord taking legal action to have you evicted from your home.
- Q. What if I change my mind?
- A. You can ask to change at any time by contacting the DWP using your online journal.
- Q. What are my choices for my housing costs?
- A. Your housing costs are currently paid to you. You will now be able to choose to have your housing costs paid directly to your landlord instead.



Q. What happens once I ask for my housing costs to be paid directly to my landlord?

A. The DWP will contact your landlord to arrange to pay them directly. If the housing cost element in your Universal Credit award is less than your full rent, then you must continue paying the difference to your landlord yourself.

Q. How will I know when the DWP has arranged to pay my landlord direct?

A. The DWP will leave a message in your journal and tell you that this has been set it up or let you know if there are any problems.

It is important that you keep paying your housing costs as you do now until you hear from the DWP, otherwise you may build up rent arrears which could result in your landlord taking legal action to have you evicted from your home.

Q. What if I do not want my landlord to know I am in receipt of benefits?

A. You will not be able to take up the new Universal Credit offer of direct payment of housing costs to your landlord. You will need to continue paying your rent to your landlord yourself.

Q. What if I change my mind?

A. If you ever want to change back and pay your landlord yourself contact the DWP using your journal.





#### Appendix 3

# <u>Discretionary Housing Payments</u> Position 30.09.17

1/	SSSC (Bedroom Tax)	<u></u>	
	Applications Approved Applications Not Eligible/Refused Applications Being Assessed	1431 49 34 1514	94.52% 3.24% 2.25%
		£000	
	Paid to Date	937339	Note 1
	2017/18 Budget (Under)/Overspend	975421 (38082)	
2/	Other DHP Cases	£000	
less:	2017/18 Budget Payments to 30/9/17 (Under)/Overspend	164451 203793 39342	Note 2 Note 3

## **Notes**

- 1/ Represents 98.4% of those households known to be affected by SSSC.
- 2/ Includes £40k from the Welfare Reform recurring budget
- 3/ Includes £18k Benefit Cap, £134k Temporary Accommodation and projection to year end.

## Scottish Welfare Fund 30<sup>th</sup> September 2017

Calls Answered	5273		
Applications	2689		
Applications Granted	1830	68.06%	
Applications Refused	386	14.35%	Note 3
Applications Withdrawn	392	14.58%	
In Progress	81	3.01%	
Referrals to DWP	160		Note 2
	<u>Spend</u> <u>£000</u>	Budget £000	Spend <u>%</u>
Crisis Grant paid (1322)	131.1	318.2	41.20%
Community Care Grants paid (529) (includes 21 applications paying both CCG & CG)	273.0	519.2	52.56%
•	404.1	837.4	48.24%

# **Note 1** 1<sup>st</sup> Tier Reviews waiting decision = 3

1<sup>st</sup> Tier Review decisions = 24 (1.08%)

1<sup>st</sup> Tier Reviews upheld in customer favour = 7 (29.17%)

2nd Tier Reviews = 2 (as % of 1<sup>st</sup> tier decisions: 8.33%)

2nd Tier Reviews upheld in customers favour = 1 (50.00%)

- **Note 2** Referrals to DWP are the number of customers who are awaiting payment of a new claim for Universal Credit from DWP. In these circumstances an application can be made for a UC advance, which is repayable to the DWP.
- **Note 3** The most common reasons for refusal of claims are, applicants not meeting the eligibility criteria, not being in receipt of a qualifying benefit or incomplete evidence provided.
- Note 4 Core Budget is £677,475 to which is added £100,000 allocation from the Welfare Reform recurring budget and a residual underspend from previous years of £60,000

#### Appendix 5



**AGENDA ITEM NO: 5** 

**Health and Social Care** Report To:

Committee

Date:

19th October 2017

Report By:

**Louise Long** 

Report No:

SW/39/2017/AH

**Corporate Director, (Chief Officer)** Inverclyde Health & Social Care

**Partnership** 

Contact Officer:

**Andrina Hunter** 

Contact No:

01475 715285

Service Manager

Inverclyde Health & Social Care

**Partnership** 

Subject:

Personal Independence Payment (PIP) Assessments

#### 1.0 PURPOSE

The purpose of this report is to provide the Committee with the information received from the Department of Work and Pensions (DWP) in relation to Inverclyde Council's request for local Personal Independence Payment (PIP) assessments.

#### 2.0 SUMMARY

- Previous reports to the Committee have highlighted a range of issues clients are reporting related to the introduction of, and migration from, Disability Living Allowance (DLA) to Personal Independence Payment (PIP). One of the main issues is the need to travel to Glasgow for assessment.
- 2.2 HSCP Officers requested a formal response from DWP in relation to the use of Duff Street Greenock, the home visiting service and also the proposal that Inverclyde conducts its own Personal Independence Payment (PIP) assessments on behalf of DWP.
- The DWP have now responded to this request explaining that Duff Street cannot be used for Personal Independence Payment (PIP) assessments and also advising that Inverclyde Council/HSCP cannot undertake assessments.
- 2.4 Funding from the Anti-Poverty Fund is being utilised to support clients who have difficulty with their journey to Glasgow for assessment.

#### 3.0 RECOMMENDATIONS

3.1 It is recommended that the Committee notes the contents of the report.

**Louise Long Corporate Director (Chief Officer) Inverclyde HSCP** 

#### 4.0 BACKGROUND

- 4.1 Personal Independence Payment (PIP) replaced Disability Living Allowance (DLA) for working age claimants in 2013. All new claims for disability support are made for Personal Independence Payment, whilst all existing working age DLA claimants in Inverclyde have been invited to apply, and be reassessed for PIP. The majority of these to be reassessed are now concluded.
- 4.2 Previous reports to Committee have highlighted a range of issues clients are reporting related to the introduction of and migration from, Disability Living Allowance (DLA) to Personal Independence Payment (PIP).
- 4.3 One of the main issues highlighted is the requirement for travel to Glasgow for Personal Independence Payment assessments and the difficulties this creates for clients. Previous correspondence with DWP has taken place to request that local assessments are held at DWP offices in Duff Street Greenock, however officers have been advised this is not possible
- 4.4 Duff Street offices have recently started to be utilised again for Work Capability Assessments for Employment Support Allowance (ESA) therefore DWP was contacted to ascertain, if it was suitable for these assessments, why it could therefore not be used for PIP assessments.
- 4.5 The Committee also requested that an approach was made to DWP to consider whether Inverclyde Council/HSCP could undertake PIP assessments on behalf of DWP.

#### 5.0 CORRESPONDENCE FROM DWP

5.1 HSCP Officers requested a formal response from DWP in relation to the use of Duff Street; the home visiting service and also the proposal that Inverclyde conducts its own PIP assessments on behalf of DWP.

#### 5.2 Response regarding the use of Duff Street Premises

DWP do not undertake PIP assessments themselves; they have a contract with Independent Assessment Services which utilises a network of subcontracting locally based organisations, including network providers of health professionals and NHS organisations. DWP have advised that under the Personal Independence Payment (PIP) Contract with Independent Assessment Services, the PIP assessment providers are responsible for supplying their own estate whilst for Work Capability Assessments (WCA), the Health and Disability Assessment Contract states that DWP themselves are responsible for providing premises.

In addition, DWP advise that PIP assessments cannot be undertaken by ESA assessors as they are different benefits paid for very different reasons and therefore require a different set of skills for each assessment. The Work Capability Assessment for ESA is a functional assessment which is focused on what an individual can do, rather than assuming their health condition or disability means they cannot work. The assessment for PIP focuses on a claimant's ability to carry out a range of activities which are fundamental to living an independent life and is designed to help working age people with the extra costs associated with their disability.

#### 5.3 Response regarding Home Visits

DWP state that the contract providers adhere to DWP guidance and review every claimant's circumstances on an individual basis to decide whether their face to face consultation will be in one of their consultation centres or in the claimant's home. Situations where a claimant may need a home consultation can include where a person's diagnosis suggested a significant disability that may make travel extremely difficult, or the claimant provides evidence from a health care professional that they are unable to travel due to their health condition or impairment. Where a face to face consultation is required, the DWP requirement is that claimants do not have to travel for more than 90 minutes by public transport to a consultation.

Appointments are booked via an automated booking system that schedules claimants into the next available appointment slot that is closest to their home. If a taxi journey is approved by DWP, clients can claim the return journey expenses back from DWP. If a claimant has any difficulties attending their appointment, DWP advise they should discuss this with their assessment provider as soon as possible using the contact details in their appointment letter.

#### 5.4 Response regarding undertaking PIP Assessments

DWP have advised that this would not be possible as the current providers have been awarded through a contracting process. DWP advises that it has a clear set of requirements on the professions, skills, experience and training of the health professionals and approval for a health professional must be conferred by the DWP Chief Medical Officer on behalf of the Secretary of State for Work and Pensions.

#### 6.0 LOCAL MITIGATION

6.1 In order to try and support clients who have to travel to Glasgow for assessments, funding from the Anti-Poverty Fund has been allocated to CVS Inverclyde (continuation of previous grant to Inverclyde Council on Disability (ICOD)). Support to travel to Glasgow with claimants is provided in certain situations with the £120 return taxi cost being paid by CVS and then claimed back from DWP rather than a client having to fund this cost upfront.

#### 7.0 IMPLICATIONS

7.1	<b>Finance</b>
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Financial Implications:

One off Costs

Cost Centre	Budget Heading	Budget Years	Proposed Spend this Report £000	Virement From	Other Comments

Annually Recurring Costs/ (Savings)

Cost Centre	Budget Heading	With Effect from	Annual Net Impact £000	Virement From (If Applicable)	Other Comments

#### Legal

7.2 No implications

**Human Resources** 

7.3 No implications

#### **Equalities**

7.4	Has a	n Equa	lity Impact Assessment been carried out?
		Yes	See attached appendix
		_	This report does not introduce a new policy, function or strategy or recommend

Χ	No	a change to an existing policy, function or strategy.	Therefore, no Equality
		Impact Assessment is required.	

# Repopulation

7.5 No implications

# 8.0 CONSULTATIONS

8.1 None

# 9.0 LIST OF BACKGROUND PAPERS

9.1 None