

Title	DHP policy review (EA002940)
EA is in support of	Amended Policy
Review Frequency	No preference
Date of first review	01/08/2018
Directorate	Strategic & support services
Division	Revenue and Benefits
Service Area	Benefits
Responsible Officer(s)	<input type="checkbox"/> David Kinnair
Quality Control Officer	<input type="checkbox"/> Mary Joyce
Accountable Officer	<input type="checkbox"/> Winston McKenzie
Initial impact assessment	<p>This Equality Assessment of Birmingham City Council Discretionary Hardship Payment (DHP) Scheme results from an amendment to the DHP policy</p> <p>Birmingham City Council currently receives annual Government funding to administer Discretionary Housing Payments (DHP's).</p> <p>For 2018/19 this amounted to £4,781,876.00</p> <p>These payments are meant to help people who claim Housing Benefit or Universal Credit who are struggling to meet their housing costs. DHP's can assist with a rent shortfall, tenancy deposit, rent in advance and other lump sums costs such as removal expenses. DHP's are made in addition to Housing Benefit or Universal Credit and do not form part of it.</p> <p>This EIA review will contribute to those considerations and provide strategic details about the impact of the scheme on those claimants with characteristics protected by the Equality Act 2010 a well as provide a platform for how the scheme will continue to be delivered. Additionally it will evaluate whether any further mitigation is required.</p>
Protected characteristic: Age	Service Users / Stakeholders; Wider Community
Selected age characteristics: add further details	<p>The Discretionary Hardship Payment scheme is and will remain open to applications from working age and pension age claimants and there are no aspects of the scheme which impact in any way on the availability of support to claimants based solely on age.</p> <p>The split between pension age claimants and working age DHP claimants was 2.5% (201) and 97.5% (7,728) respectively at the end of</p>

2014/2015. (awaiting new statistics for 2015/16 onwards)

The majority of the DHP caseload is working age as pension age customers have generally been unaffected by the welfare reform cuts such as the benefit cap, 'bedroom tax' etc..

Of the working age cases the following can be banded by age as below:

*Working Age Total %	
18-25	442 5.72%
26-35	1384 17.91%
36-45	1578 20.42%
46-55	2703 34.98%
56-65	1621 20.98%
66+	
Total	7728

This shows that the number of DHP awards for most age groups is reasonable comparative at around 20% with the exception of the 18-25 and 46-55 years age groups.

Claims from 18-25 year olds are low therefore the percentage of cases is proportional to that received.

Further analysis suggests that the 46-55 year old age group is the most affected by the Government's introduction of the 'bedroom tax' (81% of DHP awards from 46-55 year olds were paid for this reason). Some customers are now 'over occupying' properties they may have rented for some years and had taken on when their circumstances were different i.e. they had a family home but their children have now grown up and moved out.

The DHP scheme also provides protection for claimants with children. At the end of 2014/2015 32% of working age DHP claimants had dependants.

This demonstrates that the Birmingham DHP scheme is meeting its overall objective of providing protection to those affected by the Government's welfare reforms including families with children as set out in the Government's DHP guidance.

The proposed DHP policy does not deviate from this objective and does not discriminate on the grounds of age. It seeks to support citizens who claim DHP's as a result for example of the 'bedroom tax', that has been in place since April 2013, to seek a longer term solution. It also seeks to target support at priority groups, for example those families with children at a critical point in their education.

Protected characteristic: Disability

Selected disability characteristics: add further details

Service Users / Stakeholders; Wider Community

Disability - When looking at reviewing the DHP scheme protection for disabled people is paramount. At the end of 2014/2015 26% of DHP claimants had a disability.

This demonstrates that the Birmingham DHP scheme is meeting its overall objective of providing protection to those affected by the Government's welfare reforms and people with disabilities as set out in the Government's DHP guidance.

The proposed DHP strategy does not deviate from this objective and does not discriminate on the grounds of disability. It seeks to target support at priority groups, notably those with disabilities.

Protected characteristic: Gender

Selected gender characteristics: add further details

Service Users / Stakeholders; Wider Community

Although this information is recorded, there is no adverse impact on the grounds of gender.

The Discretionary Hardship Payment scheme is open to applications from persons of any gender and there are no aspects of the scheme which impact in any way on the availability of support to claimants based solely on gender.

Protected characteristics: Gender Reassignment

Selected gender reassignment characteristics: add further details

Service Users / Stakeholders; Wider Community

Gender reassignment – This information is not collected as part of the administration of the Discretionary Hardship Payment Scheme however there is no record of having received any comments or complaints or challenges regarding this particular group in respect of the design and operation and administration of the Scheme.

Protected characteristics: Marriage and Civil Partnership

Selected marriage and civil partnership characteristics: add further details

Service Users/ Stakeholders; Wider Community

Marriage and civil partnerships - This information is not collected as part of the administration of the Discretionary Hardship Payment Scheme however there is no record of having received any comments or complaints or challenges regarding this particular group in respect of the design and operation and administration of the Scheme.

Protected characteristics: Pregnancy and Maternity

Selected pregnancy and maternity characteristics: add further details

Service Users / Stakeholders; Wider Community

This information is not collected as part of the administration of the Discretionary Hardship Payment Scheme however there is no record of having received any comments or complaints or challenges regarding this particular group in respect of the design and operation and administration of the Scheme.

Protected characteristics: Race

Selected race characteristics: add further details

Service Users / Stakeholders; Wider Community

The Discretionary Hardship Payment scheme is and will remain open to applications from persons of any race and there are no aspects of the scheme which impact in any way on the availability of support to claimants based solely on race.

Analysis of the working age DHP caseload indicates that the ethnicity breakdown of claimants is broadly comparable to that of 2011 Birmingham census (as below).

As we currently only hold ethnicity data on approximately 34% of DHP claims and the last census was in 2011, a fluctuation in overall percentages would be relative. This could be indicative of current caseload trends and national/local population trends. Therefore no disproportionate change is evident at this stage but will be monitored going forward.

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Description Northgate code TOTAL %White:
 British WHITEBRIT 1620 61.81%White: Irish WHITEIRISH 47 1.79%White: Any other white background WHITEOTH 60 0.78%Mixed: White and Black Caribbean MIXEDWBC 41 1.56%
 Mixed: White and Black African MIXEDWBA 0 0.00%Mixed: White and Asian MIXEDWA 9 0.34%Mixed: Any other mixed background MIXEDOTH 4 0.15%Asian or Asian British: Indian ASANABI 50 1.91%Asian or Asian British: Pakistani ASIANABP 131 5.00%Asian or Asian British: Bangladeshi ASIANABB 41 1.56%Asian or Asian British: any other Asian background ASIANOTH 44 1.68%Black or Black British: Caribbean BLACKBBC 364 13.89%Black or Black British: African BLACKBBA 117 4.46%Black or Black British: Any other Black background BLACKOTH 84 3.20%Chinese CHINESE 6 0.23%

Gypsy/Traveller GPTRAV 0 0.00%Arab ARAB 3
0.11%

(See attached appendix) This demonstrates that the Birmingham DHP scheme is meeting its overall objective of providing protection to all those affected by the Government's welfare reforms and as set out in the Government's DHP guidance. The proposed DHP strategy does not deviate from this objective and does not discriminate on the grounds of ethnicity or race on any level. It seeks to protect and support all citizens facing hardship.

Protected characteristics: Religion or Beliefs

Service Users / Stakeholders; Wider Community

Selected religion or beliefs characteristics: add further details

This information is not collected as part of the administration of the Discretionary Hardship Payment Scheme however there is no record of having received any comments or complaints or challenges regarding this particular group in respect of the design and operation and administration of the Scheme.

Protected characteristics: Sexual Orientation

Service Users / Stakeholders; Wider Community

Selected sexual orientation characteristics: add further details

This information is not collected as part of the administration of the Discretionary Hardship Payment Scheme however there is no record of having received any comments or complaints or challenges regarding this particular group in respect of the design and operation and administration of the Scheme.

Consulted People or Groups

To be decided - suggested engagement areas include - Landlord forums, resident meetings, hostels, housing providers (LA/RSL/Private), citizens groups, CAB, CLP, homeless groups, eviction panel

Informed People or Groups

To be decided - suggested engagement areas include - Landlord forums, resident meetings, hostels, housing providers (LA/RSL/Private), citizens groups, CAB, CLP, homeless groups, eviction panel

Summary and evidence of findings from your EIA

Following this review of the Equality Assessment for the Discretionary Hardship Payment policy it has been concluded that despite the internal revision and amendment of the DHP policy, Birmingham is and will still continue to protect the most vulnerable categories of claimant which includes those defined to have protected characteristics within the Equality Act 2010. The proposals made within the DHP strategy appear fair and reasonable and do not deviate from this objective.

A reduction in DHP funding has meant that the Council has an obligation to interpret and prioritise the allocated budget to ensure that it helps those in the greatest need of support.

The Council's wish to move away from a generalised approach to award periods and rolling reviews to a more tailored award period applied on the basis of the individuals circumstance seeks to support those in the greatest need whilst also removing some of the long term reliance on the DHP fund to top up shortfalls in rent.

Accordingly to mitigate these changes the Council will look to introduce appropriate signposting to Local Authority, social landlord, third sector and Job Centre Plus support for employment, budgeting, debt advice and housing options.

As a landlord whose customers received xx % of the overall DHP awards in 2017/18 the City will also seek to introduce a tenant commitment, whereby conditionality will be applied for those out of work to seek employment or alternative accommodation in the case of over occupancy. In exchange the Council will provide targeted support work in regards to employment, budgeting and housing options, targeted interventions and visits.

The proposals made in the DHP strategy & Policy form a set of guidelines and in no way remove the discretionary nature of the scheme to consider each application on a case by case basis.

The Council provides no express provisions / conditions on claimants applying for DHP's but will seek to change behaviours and encourage claimant's to seek assistance where is it required.

Submit to the Quality Control Officer for reviewing?	No
Quality Control Officer comments	
Decision by Quality Control Officer	
Submit draft to Accountable Officer?	No
Decision by Accountable Officer	
Date approved / rejected by the Accountable Officer	
Reasons for approval or rejection	
Please print and save a PDF copy for your records	Yes

Content Type: Item
 Version: 15.0
 Created at 01/08/2018 04:34 PM by Winston McKenzie
 Last modified at 01/08/2018 05:24 PM by Workflow on behalf of Winston McKenzie

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