

Equality analysis template
Refer to guidance before completing this template

Name of service/policy/project/decision to undergo equality analysis:
Local Welfare Provision Policy
Key contact person and others involved:-
<p>Julie Higinbotham, Benefits and Investigations Manager Louise Streater, Benefits operational Manager Marc Read, Financial Inclusion Manager Ian Brown, Head of Revenues and Benefits</p>
Date completed: January 2013
Review date (at least annually): January 2014
Identify aims:
<p>The Welfare Reform Act 2012 ends the current provision of Community Care Grants (CCG's) and Crisis Loans (CL's) under the discretionary elements of the social fund provided by the Department for Work and Pensions (DWP). From April 2013 funding for this provision will be transferred to local authorities who will be responsible for providing locally administered assistance for vulnerable groups.</p> <p>There is no statutory duty for Local Authorities to deliver a specific scheme for administering this funding but Wiltshire Council considers it in the best interest of the community to trial a new locally based scheme. Therefore, Cabinet have been asked to ratify proposals for the new scheme for Local Welfare Provision (LWP). The LWP scheme is primarily intended to:</p> <ul style="list-style-type: none"> • To support people through personal/economic/life crisis, alleviating immediate hunger or poverty, this may be through either signposting to other benefits and/or direct support • To support vulnerable people to return or to remain in the community or to ease exceptional pressures on families <p>The LWP scheme will be available to all Wiltshire residents or people with local connections and accessible via referral from partners such as the Citizen Advice Bureau, Department For Work and Pensions and other organisations that support the vulnerable. The Council will also accept direct claims from potential applicants or their representatives.</p> <p>Rather than providing applicants with cash payments, which may leave the service open to abuse the council has worked with partner organisations and is developing a network of support which can be accessed via referral to a third party depending on immediate need. Referrals may be to a food bank, white good supplier, furniture supplier or others depending on the presenting need. Those people falling outside the remit of the service will be directed to other forms of support by means of intelligent signposting to other organisations that can provide appropriate help and support.</p> <p>Unfortunately, the amount of funding the council will receive to deliver the new scheme is less than that spent by DWP in the 2012/13 year on CCG's and CL's. Furthermore funding for local provision has not been guaranteed beyond 2014/15. Although the Council has been given the opportunity to redesign and deliver emergency provision in a more responsive way, the scheme has to be delivered within a finite budget.</p>

Collect and use evidence:

The Department for Work and Pensions has provided local authorities with limited historical data at a national level. Pre April 2013 information is available on the number of Crisis Loans/Community Care Grants applications and percentage of successful awards by disability, age, gender and ethnicity. At a county level data is also available for age, number of applications, successful awards with a breakdown by reason. The full detail of the data can be found at :-

<http://www.dwp.gov.uk/local-authority-staff/social-fund-reform/localisation-data>

This historical data can only provide a rough guide in terms of future demand and trends as the new scheme is moving away from a remote model of central administration to local delivery, and seeks to deliver a more responsive, better targeted and relevant service to the most vulnerable.

In March 2011 the DWP published an Equality Impact Assessment for locally delivered support to replace Social Fund Community Care Grants and Crisis Loans. The assessment sets out the rationale and case for change which is based on focusing provision around the most vulnerable in society which can be better achieved at a local level. The full assessment can be found at:-

www.parliament.uk/documents/impact-assessments/IA11-022BI.pdf

It would appear that the most of the historic data, and reports collated were prior to the new Equality Duty that came into effect from April 2011 and therefore do not make reference to all of the 9 protected characteristics. Wider equality data across all of the protected characteristics will be captured as part of the application process to the new scheme.

Furthermore, detailed case level information will be captured and analysed about both successful and unsuccessful applications to help inform future development of the scheme.

Assess the impact:

The service is available to anyone residing in the county or who has local connections to Wiltshire and satisfies the eligibility criteria. Eligibility is based on the presenting need as well as the applicant's individual circumstances and level of exposure to risk if no assistance was offered.

The key changes from the current national model of support are:

- A direct shift away from support in the form of cash. New arrangements are being put in place to ensure applicants receive goods and services by referral rather than cash. This will help to prevent abuse of the system and ensure finite resource is directed more effectively
- Development of support packages that go beyond addressing the immediate crisis but rather helps people to help themselves.
- Local access routes
- Easier application process but with stricter eligibility criteria.
- No longer dependant on entitlement to specified benefit
- Awards instead of loans

Wiltshire Council has developed a scheme that seeks to provide greater access to those most in need and limits opportunities for abuse.

Ensure fairness:

By moving from a remote model of central administration to local delivery, assistance will be better targeted to the most vulnerable. In addition, customers will be better served as we know that those accessing the current service have complex needs that would benefit from a locally delivered more integrated and holistic approach.

During the development of the scheme the Council has tried hard to balance the reality of a significant cut in funding with protecting and targeting the new scheme towards the most vulnerable members of our community. Particular focus has been on the potential impact that this change of model will have on the people with protected characteristic under the Equality Act:-

Disability

Historical data at a national level for 2011/12 illustrates 31.2% of all claimants were categorised as disabled. Overall the numbers of successful claims were higher for disabled customers (48%) than for non-disabled customers (43%). Available data indicates disabled people have at the very least an equal chance of success in getting support. There is nothing in the criteria for the new scheme that should affect access for individuals with this particular characteristic, although action will be taken to specifically target communication about the new scheme to disabled groups. Furthermore, the scheme will be regularly monitored and evaluated to ensure disabled people continue to get the support they require.

Age

In reviewing local data in respect of awards made by age in the first six months of 2011/12 the following tables illustrate customers age 45 and over have far lower success rates. We do not have sufficient information to understand why older people are less likely to be awarded crisis loans and community care grants. However, the provision of a locally-delivered service may promote a more equal spread of applications across the age ranges or at least aid understanding as to the reasons for such a marked difference in take up _

Table 1

<i>Crisis Loan - Age of recipient</i>	
Under 18	2%
18 to 24	23%
25 to 34	26%
35 to 44	20%
45 to 54	15%
55 to 64	9%
65 to 69	1%
70 to 79	2%
80 to 89	1%
90 and over	0%

Table 2

<i>Community Care Grants -Age of recipient</i>	
Under 18	3%
18 to 24	33%
25 to 34	29%
35 to 44	20%
45 to 54	11%
55 to 64	3%

65 to 69	0%
70 to 79	0%
80 to 89	0%
90 and over	0%

Religion/Belief

The provision of goods and services rather than cash may impact adversely on some individuals with specified dietary requirements that may not be served by the food bank. This may be overcome by issue of a pre paid card/voucher that will enable the individual to purchase appropriate food locally

Gender

Unfortunately, there is rather limited disaggregated data for a comprehensive analysis of gender in relation to applicants and success rates across Wiltshire. Although local data for first six months of 2011/12 suggests that the majority of successful applicants for CCG's 54% were women with 34% male and 14% couples. However, the provision of a locally-delivered service may promote a more equal spread of applications across gender or at least help us to understand why there is such a marked difference in take up.

Gender reassignment

It would appear that the most of the historic data, and reports collated were prior to the new Equality Duty that came into effect from April 2011 and therefore do not make reference to all of the 9 protected characteristics. Wider equality data across all of the protected characteristics will be captured as part of the application process to the new scheme.

Sexual orientation

There is no national data on sexuality as it is not relevant in terms of accessing the national scheme. The merits of collecting equality data across all protected characteristics will be considered as the scheme progresses.

Race

The council does not currently keep case level data on race. Support will be given in terms of accessing the new service with particular regard to interpretation services, availability of forms and information in different languages and targeted benefit campaigns. Furthermore, the merits of collecting equality data across all protect characteristics will be considered as the scheme progresses.

The new scheme will not discriminate against any protected group covered by the Equality Act 2010. Although elements of benefit in kind provision may impact adversely on one protected characteristic group 'Religion/Belief, as highlighted above.

Marriage and Civil Partnership

Marriage Couples and civil partnerships are recognised equally under the new scheme. Furthermore wider equality data across all of the protected characteristics will be captured as part of the application process to the new scheme.

Pregnancy and Maternity

The DWP will continue to administer statutory elements of the social fund including sure start maternity grants. Furthermore wider equality data across all of the protected characteristics will be captured as part of the application process to the new scheme.

Deprived/Socio Economic/Disadvantaged groups

The overriding driver to devolve the scheme to a local level is to ensure it benefits those most

disadvantaged individuals in the community. By delivering the scheme locally may ensure that applicants can be sign-posted or encouraged to apply for other funding administered by the council. Funding allocation will be carefully monitored to ensure equity across the socio economic divide.

Finalise your decision:

Senior staff and stakeholders have been consulted in the design and delivery of the new scheme, and the policy document setting out the scope and qualifying criteria will be put before cabinet in February 2013.

In developing a new scheme the council has made every attempt to design out the failings of the old national scheme which was introduced over two decades ago, since then welfare delivery has changed significantly and Wiltshire residents need a local system of support. The new scheme will deliver a more responsive, better targeted and relevant service.

Furthermore, it is recognised that this is just the first phase of a new scheme. It is likely that the qualifying criteria and design of the LWP Scheme will continue to develop over time, through wider consultation and ongoing review of case load and the analysis of applications in order to better understand and measure need and local demand.

Communicate what has happened:

- This impact Analysis will be published alongside the policy document on the councils website
- Awareness sessions are currently taking place amongst stakeholders and other council departments
- The DWP will be delivering a national campaign of awareness as well as signposting customers

Review your decision:

- The scheme will be reviewed quarterly by senior managers