Equality Impact Assessment [version 2.9]

Title: Household Support Fund (April 2023 – March 2024)	
☒ Policy ☐ Strategy ☐ Function ☐ Service ☐ Other [please state]	☒ New ☐ Already exists / review ☐ Changing
Directorate: Finance	Lead Officer name: Denise Murray
Service Area: Benefits Service	Lead Officer role: Service Director – Finance

Step 1: What do we want to do?

The purpose of an Equality Impact Assessment is to assist decision makers in understanding the impact of proposals as part of their duties under the Equality Act 2010. Detailed guidance to support completion can be found here Equality Impact Assessments (EqIA) (sharepoint.com).

This assessment should be started at the beginning of the process by someone with a good knowledge of the proposal and service area, and sufficient influence over the proposal. It is good practice to take a team approach to completing the equality impact assessment. Please contact the Equality and Inclusion Team early for advice and feedback.

1.1 What are the aims and objectives/purpose of this proposal?

Briefly explain the purpose of the proposal and why it is needed. Describe who it is aimed at and the intended aims / outcomes. Where known also summarise the key actions you plan to undertake. Please use plain English, avoiding jargon and acronyms. Equality Impact Assessments are viewed by a wide range of people including decision-makers and the wider public.

Following the Chancellor's Autumn Budget Statement, it was announced that there will be a fourth round of the Household Support Fund to cover the period from April 2023 to March 2024, with a further £1 billion (£842m for England) being released to councils, to support those most in need with the cost of food, energy and water bills, phone, broadband and clothing and in exceptional cases, housing costs. This funding is for a whole year as opposed to previous versions which have been for six months only. Funding has been confirmed at £8,079,930.

The eligibility criteria are contained in 3.2 of the policy in appendix A but the main areas/changes are as below.

- Any grant should predominately be used to assist households with the costs of; food, gas/electricity, water, phone/broadband, essential household items (e.g. white goods, beds/beddings, clothing, baby/sanitary products) and housing costs (in exceptional circumstance).
- No percentage spend was to be linked to households with children and/or pensioners.
- For the first time, the fund can be used to provide supplementary advice services to award recipients, including debt and benefit advice, but should not be the primary function.
- Part of the fund must also include an application-based support delivered through the scheme is clearly advertised to residents.

Details regarding how any fund may be implemented are contained within 3.3 of the policy in appendix A as well as proposed/agreed spend under section 4, but for 2023/24 has an increased focus on those households with disabilities.

1.2 Who will the proposal have the potential to affect?

☐ Bristol City Council workforce	☒ Service users	☒ The wider community
☐ Commissioned services	☐ City partners / Stakeholder organisations	
Additional comments:		

1.3 Will the proposal have an equality impact?

Could the proposal affect access levels of representation or participation in a service, or does it have the potential to change e.g. quality of life: health, education, or standard of living etc.?

If 'No' explain why you are sure there will be no equality impact, then skip steps 2-4 and request review by Equality and Inclusion Team.

If 'Yes' complete the rest of this assessment, or if you plan to complete the assessment at a later stage please state this clearly here and request review by the Equality and Inclusion Team.

☒ **Yes**	☐ **No**	[please select]

Step 2: What information do we have?

2.1 What data or evidence is there which tells us who is, or could be affected?

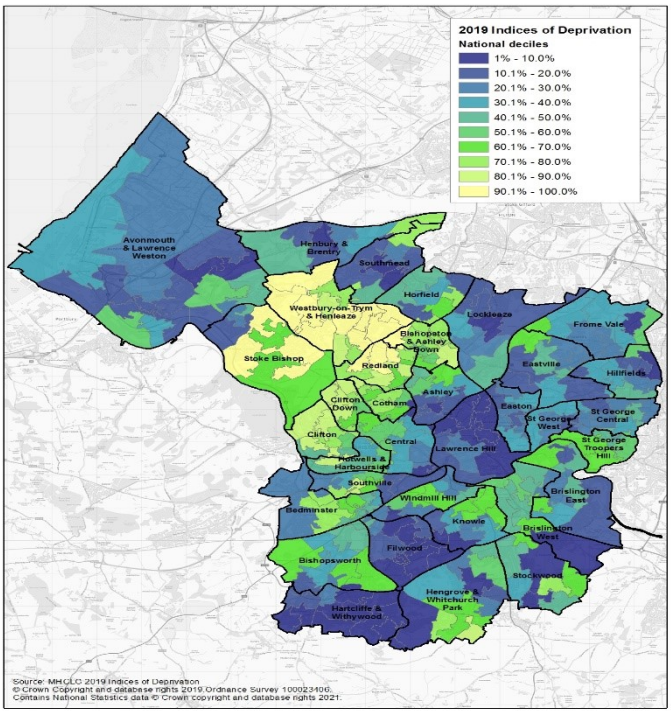
Please use this section to demonstrate an understanding of who could be affected by the proposal. Include general population data where appropriate, and information about people who will be affected with particular reference to protected and other relevant characteristics: https://www.bristol.gov.uk/people-communities/measuring-equalities-success .

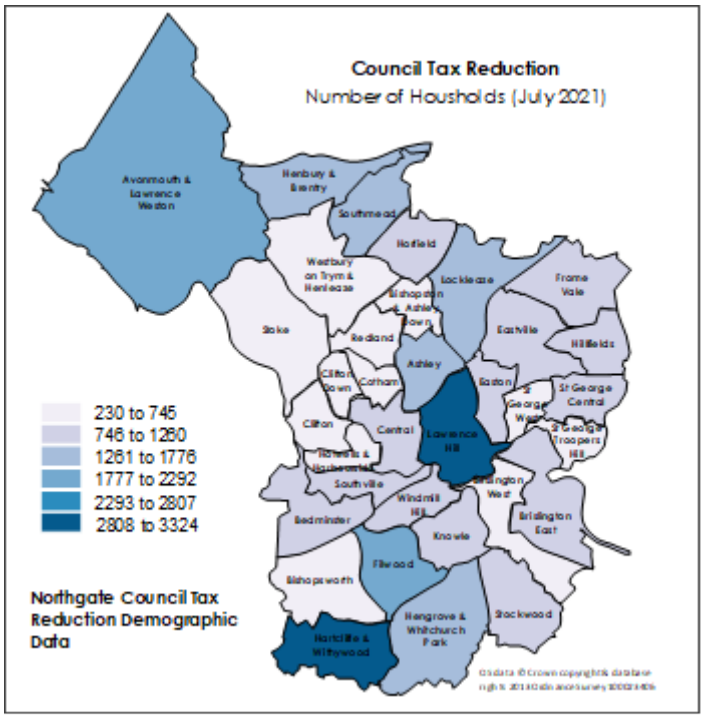
Use one row for each evidence source and say which characteristic(s) it relates to. You can include a mix of qualitative and quantitative data e.g. from national or local research, available data or previous consultations and engagement activities.

Outline whether there is any over or under representation of equality groups within relevant services - don't forget to benchmark to the local population where appropriate. Links to available data and reports are here Data, statistics and intelligence (sharepoint.com). See also: Bristol Open Data (Quality of Life, Census etc.); Joint Strategic Needs Assessment (JSNA); Ward Statistical Profiles.

For workforce / management of change proposals you will need to look at the diversity of the affected teams using available evidence such as HR Analytics: Power BI Reports (sharepoint.com) which shows the diversity profile of council teams and service areas. Identify any over or under-representation compared with Bristol economically active citizens for different characteristics. Additional sources of useful workforce evidence include the Employee Staff Survey Report and Stress Risk Assessment Form

Data / Evidence Source [Include a reference where known]	**Summary of what this tells us**
Housing Benefit/Council Tax Reduction data (Single Housing Benefit Extract (SHBE)/CTR demographics) [Northgate HB/CTR database]	The maps show that CTR awards are greater in areas of high deprivation e.g. Lawrence Hill, Hartcliffe and Withywood, Avonmouth and Lawrence Weston, Ashley, Filwood, Lockleaze, Southmead and Brislington East.





Quality of Life June 2022 — Open Data Bristol

The Quality of Life in Bristol survey shows there are significant disparities based on peoples characteristics and circumstances in the extent to which they find it difficult to manage financially:

Quality of Life Indicator	% who find it difficult to manage financially
16 to 24 years	12.5
50 years and older	6.7
65 years and older	3.2
Female	8.6
Male	8.5
Disabled	21.6
Asian /Asian British	9.9
Black/Black British	19.8

Mixed/Multiple Ethnicity	16.3
White British	7.8
White Minority Ethnic	8.4
Lesbian Gay or Bisexual	12.7
No Religion or Faith	8.0
Christian Religion	8.3
Other Religions	18.2
Carer	10.7
Full Time Carer	14.0
Part Time Carer	9.7
Single Parent	28.6
Two Parent	9.6
Parent (all)	12.0
No Qualifications	10.0
Non-Degree Qualified	12.9
Degree Qualified	6.7
Rented (Council)	20.3
Rented (HA)	20.6
Rented (Private)	14.6
Owner Occupier	4.6
Most Deprived 10%	18.8
Bristol Average	**8.7**

Additional comments:

2.2 Do you currently monitor relevant activity by the following protected characteristics?

☒ Age	☒ Disability	☐ Gender Reassignment
☐ Marriage and Civil Partnership	☒ Pregnancy/Maternity	☒ Race
☐ Religion or Belief	☒ Sex	☐ Sexual Orientation

2.3 Are there any gaps in the evidence base?

Where there are gaps in the evidence, or you don't have enough information about some equality groups, include an equality action to find out in section 4.2 below. This doesn't mean that you can't complete the assessment without the information, but you need to follow up the action and if necessary, review the assessment later. If you are unable to fill in the gaps, then state this clearly with a justification.

For workforce related proposals all relevant characteristics may not be included in HR diversity reporting (e.g. pregnancy/maternity). For smaller teams diversity data may be redacted. A high proportion of not known/not disclosed may require an action to address under-reporting.

Whilst we have local diversity data for comparison, our existing Housing Benefit (HB) and Council Tax Reduction (CTR) database does not hold data on: religion/belief, sexual orientation, marriage/civil partnership, pregnancy/maternity, gender reassignment or disability (however it does show if a disability related benefit is in payment). This payment provides an indication of who is in receipt of this benefit payment.

Some limited cohort data is held on ethnicity, but this is of poor quality due to the low response rates to equality questions asked on application forms (which we have asked for our supplier to enhance).

We do hold geographical location data for our current claim database, and we have been able to use census and other data to help fill the gaps in data.

We have tried to match with other datasets including the Department for Work and Pensions (DWP) Universal Credit data files extracts, but they only contain information relating to National Insurance numbers, income and number of children.

We also know some Equality groups in the city find it hard to manage and so we will bear this in mind when assessing who the next tranche of funding is allocated to.

2.4 How have you involved communities and groups that could be affected?

You will nearly always need to involve and consult with internal and external stakeholders during your assessment. The extent of the engagement will depend on the nature of the proposal or change. This should usually include individuals and groups representing different relevant protected characteristics. Please include details of any completed engagement and consultation and how representative this had been of Bristol's diverse communities. See https://www.bristol.gov.uk/people-communities/equalities-groups.

Include the main findings of any engagement and consultation in Section 2.1 above.

If you are managing a workforce change process or restructure please refer to Managing change or restructure (sharepoint.com) for advice on consulting with employees etc. Relevant stakeholders for engagement about workforce changes may include e.g. staff-led groups and trades unions as well as affected staff.

Due to the short timeframes, yet again from central government around funding for the Hardship Support Fund (3) October 2022 to March 2023, a full-scale consultation process has not been possible.

However, there has been previous engagement with a multitude of internal stakeholders, including the BCC's Bristol Community Development Team, Food Strategy Board, Community Exchange, and externally Citizens Advice, Feeding Bristol, Centre for Sustainable Energy and AgeUK to explore best possible solutions around the distribution of this grant. This will continue with the remaining part of this grant for 2022/23. (Note this list is not exhaustive).

Feedback from the previous grant exercises of the same fund, found that distribution of free school meals electronic vouchers via schools/educational establishments worked well, with redemption rates being in the high ninety percent. This is compared to the paper vouchers exercise in Winter 2022 to those households on Council Tax Reduction, where redemption rates were on in the low eighty percent. In addition to lower take up, there was a greater assistance needed to redeem the paper vouchers and therefore administrative burden on the council and third sector. Feedback from both exercises, was that the additional monies quite a difference on food/fuel poverty within these households, but we also need to longer term solutions, where possible within the timeframes, and these have been further developed this time round.

2.5 How will engagement with stakeholders continue?

Explain how you will continue to engage with stakeholders throughout the course of planning and delivery. Please describe where more engagement and consultation is required and set out how you intend to undertake it. Include any targeted work to seek the views of under-represented groups. If you do not intend to undertake it, please set out your justification. You can ask the Equality and Inclusion Team for help in targeting particular groups.

Engagement will continue with stakeholders as the proposals go through the council's decision making pathway on the remaining fund as well as working closely with its consultation and engagement team.

Step 3: Who might the proposal impact?

Analysis of impacts must be rigorous. Please demonstrate your analysis of any impacts of the proposal in this section, referring to evidence you have gathered above, and the characteristics protected by the Equality Act 2010. Also include details of existing issues for particular groups that you are aware of and are seeking to address or mitigate through this proposal. See detailed guidance documents for advice on identifying potential impacts etc. Equality Impact Assessments (EqIA) (sharepoint.com)

3.1 Does the proposal have any potentially adverse impacts on people based on their protected or other relevant characteristics?

Consider sub-categories (different kinds of disability, ethnic background etc.) and how people with combined characteristics (e.g. young women) might have particular needs or experience particular kinds of disadvantage.

Where mitigations indicate a follow-on action, include this in the 'Action Plan' Section 4.2 below.

GENERAL COMMENTS (highlight any potential issues that might impact all or many groups)	
We have not identified any significant negative impact from the proposal and overall we expect the award of monies through the Hardship Support Grant will have a positive impact on people from protected characteristic groups who find it more difficult to manage financially. We are aware that our allocation process (using HB/CTR data) may mean some groups particularly benefit, whereas other groups may not to the same extent. The main mitigation/justification is that allocation will be based on robust measures and indicators of financial hardship - see below for specific mitigations and comments.	
PROTECTED CHARACTERISTICS	
Age: Young People	Does your analysis indicate a disproportionate impact? Yes ☒ No ☐
Potential impacts:	The proposal is to award a high proportion of available funding to those low income households with children. Therefore this this is likely to particularly benefit families with dependent children.
Mitigations:	A large proportion of this grant will also focus on households without children including those facing gas, electricity and utility poverty.
Age: Older People	Does your analysis indicate a disproportionate impact? Yes ☒ No ☒
Potential impacts:	Central govt. have removed specific ringfence for older people.
Mitigations:	Some of the grant will be ring fenced to organisations that assist older people, plus some given to more general funds, that award regardless of age. There will also be a residual amount of funding, deliberately not ring fenced at present, so later decisions can be made to target any group that is later found to be under represented.
Disability	Does your analysis indicate a disproportionate impact? Yes ☒ No ☐
Potential impacts:	Possible over representation when compared to Department for Work and Pensions (DWP) official estimates showing 18% of working age adults are Disabled people, whereas in HB/CTR (when using the definition to be households in receipt of DLA, PIP, or the Support Component of ESA are in payment for either the claimant or the partner) shows 25% which is higher than Bristol's working age indicator of 12.4%.
Mitigations:	This overrepresentation is by design within a benefit system to recognise additional costs/expenditure within this group and the fact that not all Disabled people will be in receipt of a disability benefit, it is likely that this figure is an underestimate. The fund will take account of people who may not be in receipt of PIP however may be claiming other in work related benefits.
Sex	Does your analysis indicate a disproportionate impact? Yes ☒ No ☐
Potential impacts:	There is possible overrepresentation and despite that the fact that the amount of single people of working age without children is roughly equal 50%/50% and reflects Bristol's sex split, women make up over 95% of single parent households in our current HB/CTR caseload which is higher than average for the South West of 84.7%
Mitigations:	None
Sexual orientation	Does your analysis indicate a disproportionate impact? Yes ☐ No ☒

<table>
<tr><td>Potential impacts:</td><td>We do not hold any cohort data on sexual orientation however there is no reason to suppose that this protected characteristic would be differently distributed across the working age HB/CTR caseload compared to the wider population.</td></tr>
<tr><td>Mitigations:</td><td>None</td></tr>
<tr><td>Pregnancy / Maternity</td><td>Does your analysis indicate a disproportionate impact? Yes ☒ No ☐</td></tr>
<tr><td>Potential impacts:</td><td>We do not hold any cohort data on pregnancy and maternity however it would be reasonable to assume that this protected characteristic may be overrepresented in our current working age caseload due to the high number of families with children and particularly of female lone parents (see ‘sex’).</td></tr>
<tr><td>Mitigations:</td><td>None</td></tr>
<tr><td>Gender reassignment</td><td>Does your analysis indicate a disproportionate impact? Yes ☐ No ☒</td></tr>
<tr><td>Potential impacts:</td><td>We do not hold any cohort data on gender reassignment however there is no reason to suppose that this protected characteristic would be differently distributed across income bands or across the working age HB/CTR caseload compared to the wider population.</td></tr>
<tr><td>Mitigations:</td><td>None</td></tr>
<tr><td>Race</td><td>Does your analysis indicate a disproportionate impact? Yes ☒ No ☐</td></tr>
<tr><td>Potential impacts:</td><td>
<table>
<tr><td>Bristol ethnicity groups</td><td>472462</td><td>2021 Census</td></tr>
<tr><td>Asian or Asian British</td><td>31271</td><td>6.6%</td></tr>
<tr><td>Black or Black British</td><td>27886</td><td>5.9%</td></tr>
<tr><td>Mixed or multiple ethnic groups</td><td>21120</td><td>4.5%</td></tr>
<tr><td>White Other</td><td>44891</td><td>9.5%</td></tr>
<tr><td>White British</td><td>338251</td><td>71.6%</td></tr>
<tr><td>Other ethnic background</td><td>9043</td><td>1.9%</td></tr>
<tr><td>Black Asian and minority ethnic</td><td></td><td>18.9%</td></tr>
</table>

The HB/CTR caseload is estimated to contain 25% of from Black, Asian and minoritised ethnic communities a group which is overrepresented within the caseload and at ward level when compared to the population of Bristol as a whole which is around 19%, (especially those central wards and those to the inner east of the city).

Data for HB/CTR caseload regarding European nationals is not available and this area is further complicated by the fact that many European nationals will be excluded by HB/CTR regulations for receiving any support.</td></tr>
<tr><td>Mitigations:</td><td>There will be further work to look at targeting assistance to those that have No Recourse to Public Funds (e.g. refuges, asylum seekers, those failing to register under EUSS) from the remaining grant.</td></tr>
<tr><td>Religion or Belief</td><td>Does your analysis indicate a disproportionate impact? Yes ☒ No ☐</td></tr>
<tr><td>Potential impacts:</td><td>The Quality of Life survey shows people from non-Christian faith groups more likely to find they are finding it hard to financially manage. The information that we hold suggests that Muslims living within Central and East parts of the city are overrepresented within the CTR caseload and those declaring a Christian or no religion on the outskirts of the city.

Comparison of mapping of the distribution of CTR recipients suggests a correlation between areas with high proportion of Muslim residents (2021 census) and high CTR demand (central areas) but also high demand in some peripheral areas where there are high proportions of Christians or those with no religion.</td></tr>
<tr><td>Mitigations:</td><td>None</td></tr>
<tr><td>Marriage & civil partnership</td><td>Does your analysis indicate a disproportionate impact? Yes ☐ No ☒</td></tr>
</table>

Potential impacts:	We do not hold any data on marriage and civil partnerships however there is no reason to suppose that this protected characteristic would be differently distributed across income bands or across the working age HB/CTR caseload compared to the wider population.
Mitigations:	None
OTHER RELEVANT CHARACTERISTICS	
Socio-Economic (deprivation)	Does your analysis indicate a disproportionate impact? Yes ☐ No ☒
Potential impacts:	See original map distribution of CTR.
Mitigations:	None
Carers	Does your analysis indicate a disproportionate impact? Yes ☐ No ☒
Potential impacts:	We do not hold any data on carers however there is no reason to suppose that this protected characteristic would be differently distributed across income bands or across the working age HB/CTR caseload compared to the wider population.
Mitigations:	None
Other groups [Please add additional rows below to detail the impact for other relevant groups as appropriate e.g. Asylums and Refugees; Looked after Children / Care Leavers; Homelessness]	
Potential impacts:	There may be other groups that may not qualify for this initial voucher award in other groups and are hard to identify.
Mitigations:	There will also be a residual amount of funding, deliberately not ring fenced at present, so later decisions can be made to target any group that is later found to be under represented.

3.2 Does the proposal create any benefits for people based on their protected or other relevant characteristics?

Outline any potential benefits of the proposal and how they can be maximised. Identify how the proposal will support our Public Sector Equality Duty to:

- ✓ Eliminate unlawful discrimination for a protected group
- ✓ Advance equality of opportunity between people who share a protected characteristic and those who don't
- ✓ Foster good relations between people who share a protected characteristic and those who don't

As per section 3.1. the award of monies through the Hardship Support Grant will only have a positive impact of those protected or relevant characteristics, but by using HB/CTR data there may be some groups that disproportionately benefit, where other groups may not.

Step 4: Impact

4.1 How has the equality impact assessment informed or changed the proposal?

What are the main conclusions of this assessment? Use this section to provide an overview of your findings. This summary can be included in decision pathway reports etc.

If you have identified any significant negative impacts which cannot be mitigated, provide a justification showing how the proposal is proportionate, necessary, and appropriate despite this.

Summary of significant negative impacts and how they can be mitigated or justified:
There are no significant negative impacts, although it is possible that some equalities groups may not benefit from this fund when compared to others, and other groups benefit more due to higher representation in the Free School Meal cohort. This fund does not take account of equality groups who find it financially hard to manage but whose children are not on Pupil Premium.
Summary of positive impacts / opportunities to promote the Public Sector Equality Duty:

The Household Support fund will advance equality of opportunity for those protected characteristic groups who are more likely to experience financial hardship, and who also receive Pupil Premium and who are at a disadvantage.

4.2 Action Plan

Use this section to set out any actions you have identified to improve data, mitigate issues, or maximise opportunities etc. If an action is to meet the needs of a particular protected group please specify this.

Improvement / action required	Responsible Officer	Timescale
None		

4.3 How will the impact of your proposal and actions be measured?

How will you know if you have been successful? Once the activity has been implemented this equality impact assessment should be periodically reviewed to make sure your changes have been effective your approach is still appropriate.

Total grant funding although £8m to Bristol City Council, individual awards are not sums that will have a major impact of those households/take them out of benefit entitlement but will assist for a short term with immediate needs to pay food and utility /clothing bills for the period October 2022 to March 2023. The impact is to help reduce food /fuel poverty over this period, but this will be difficult to measure as the effect will be relatively short term but will measure against contacts to the Citizen Service Point (CSP) for this type of advice and against applications to the council's Local Crisis and Prevention Fund over the same period, plus feedback from third sector organisations and in particular those commissioned to distribute some of this fund.

Step 5: Review

The Equality and Inclusion Team need at least five working days to comment and feedback on your EqIA. EqIAs should only be marked as reviewed when they provide sufficient information for decision-makers on the equalities impact of the proposal. Please seek feedback and review from the Equality and Inclusion Team before requesting sign off from your Director[1].

Equality and Inclusion Team Review: *Reviewed by Equality and Inclusion Team*	**Director Sign-Off:**
Date: 3/3/2023	Date: 10/03/2023

[1] Review by the Equality and Inclusion Team confirms there is sufficient analysis for decision makers to consider the likely equality impacts at this stage. This is not an endorsement or approval of the proposal.