



North

Yorkshire County Council

Equality Impact Assessment Template

If you would like this information in another language or format such as Braille, large print or audio, please contact the Communications Unit on 01609 53 2013 or email communications@northyorks.gov.uk.

যদি আপনি এই ডকুমেন্ট অন্য ভাষায় বা ফরমেটে চান, তাহলে দয়া করে আমাদেরকে বলুন।

如欲索取以另一語文印製或另一格式製作的資料，請與我們聯絡。

اگر آپ کو معلومات کسی دیگر زبان یا دیگر شکل میں درکار ہوں تو برائے مہربانی ہم سے پوچھئے۔



Undertaking an Equality Impact Assessment

Equality Impact Assessments (EIA) should be undertaken at the business case stage when:-

- You are developing a new service or policy
- You are reviewing an existing service or policy
- You are proposing a change to an existing service or policy
- You are reviewing a service or policy carried out on behalf of the council or another organisation
- Your service is re-organised.

They should be referenced in your final recommendations on the service changes so that decision makers can reach an informed decision on the service/policy.

An EIA should cover all the social identity characteristics protected by equality legislation – referred to as ‘**protected characteristics**’ or equality strands. These are;

- Sex
- Sexual orientation
- Religion or belief
- Race – this include ethnic or national origins, colour and nationality
- Disability – including carers
- Pregnancy and maternity
- Gender reassignment
- Age
- Marital/civil partnership status

There is a lot of information available to support you in completing this assessment on the EIA pages on the NYCC intranet

Equality Impact Assessments are public documents. Full EIAs accompanying reports going to County Councillors for decisions are published with the committee papers on our website and available in hard copy for people attending the relevant meeting. To make it easier for people to find equality impact assessments

the Council will publish also publish full equality impact assessments on the NYCC website in line with statutory requirements.

Name of the Directorate and Service Area	Central Services		
Name of the service/policy being assessed	New locally based assistance – North Yorkshire Local Assistance Fund		
Is this the area being impact assessed a	Policy & its implementation?	Yes	Service?
	Function	Yes	Initiative?
	Project?		Procedure & its implementation?
Is this an Equality Impact Assessment for a (Note: the Equality Impact Assessment (EIA) is concerned with the policy itself, the procedures or guidelines which control its implementation and the impact on the users)	Existing service or a policy and its implementation?		Yes
	Proposed service or a policy and its implementation?		Yes
	Change to an existing service or a policy and its implementation?		
	Service or Policy carried out by an organisation on behalf of NYCC?		Yes
How will you undertake the EIA? Eg team meetings, working party, project team, individual Officer	<p>Via the Design Group Working group, which comprises County Council Officers, a representative from the citizens advice bureaux and a representative from the district councils (housing and benefits sections).</p> <p>In addition workshops have been held involving County Council officers from relevant directorates and partner agencies (housing associations, housing related support providers, furniture stores, district councils, citizens advice bureaux, North Yorkshire and York Forum, Probation Trust, Rural Action Yorkshire and North Yorkshire Credit Union). The purpose of the workshops included identifying options for the new locally-based assistance to ensure that the funding would be targeted on those facing greatest difficulty in managing their income, which includes some of the target groups (children & young people).</p> <p>Review of the original Equality Impact Assessment (EIA) undertaken on 4th December 2013. All comments from this review are highlighted in red below.</p>		
Names and roles of people carrying out the Impact Assessment	Jonathan Spencer (Corporate Development Officer) Linda Porritt (Benefits, Assessments & Charging Manager)		

	<p>Avril Hunter (Strategic Commissioning Manager) Jeremy Cook (Corporate Development Officer)</p> <p>Diane Parsons (Corporate Development Officer)</p>	
Lead Officer and contact details	<p>Jonathan Spencer (Corporate Development Officer) 01609 533488 jonathan.spencer@northyorks.gov.uk</p> <p>Diane Parsons (Corporate Development Officer) 01609 532750 diane.parsons@northyorks.gov.uk</p>	
Date EIA started	24 September 2012	
Date EIA Completed	<p>16 November 2012 (v1) Review completed 4th December 2013</p>	
Sign off by Service Head/ Business Unit Head		
Sign off by Assistant Director (or equivalent)	Neil Irving	
Date of Publication of EIA	18 December 2012 / review signed off 20th January 2014	
Monitoring and review process for EIA	<p>Through review meetings. Equality information collected by the delivery body and at access points will be assessed at least once a year.</p> <p>Equality monitoring information supplied by applicants was reviewed end August 2013.</p>	

1. Operating Context

Please consider issues around impacts (positive or negative) raised for all [protected characteristics](#) and show your evidence

1.1 Describe the service/policy

What does the service/policy do and how? How would you describe the policy to someone who knows very little about Council Services?

If there is a proposal to change the service or policy, describe what it looks like now and what it is intended to look like in the future. What are the drivers for this proposed change?

Who does it benefit? What are its intended outcomes? Who is affected by the policy? Who is intended to benefit from it and how? Who are the stakeholders? identify those protected characteristics for which this service is likely to have an impact (positive or negative)

Are there any other policies or services which might be linked to this one? Have you reviewed the EIA for these policies/services? What do they tell you about the potential impact?

How will the policy be put into practice? Who is responsible for it?

Outline of existing service and changes to be made to the service

Using powers in the Welfare Reform Act 2011, the Government will be abolishing Community Care Grants (CCGs) and Crisis Loans (CLs) from April 2013. These are discretionary Social Fund payments administered by DWP through Jobcentre Plus. CCGs and CLs will be replaced by new local assistance provided by upper-tier and unitary local authorities and funded by a fixed grant from DWP.

CCGs are currently payable to anyone in receipt of certain income-related benefits in certain circumstances. They are non-repayable grants awarded for range of expenses including household equipment and are primarily intended to support vulnerable people to return to or remain in the community or to ease exceptional pressure on families.

CLs are interest-free loans available to anyone (whether on benefit or not) who cannot meet their immediate short-term needs in an emergency or as a consequence of a disaster, where there is an immediate risk to their health or safety.

Local authorities will not be required to replicate CCGs or CLs. However, they will be expected to concentrate the funding on those facing greatest difficulty in managing their income, and to enable a more flexible response to unavoidable need, perhaps through a mix of cash or goods and aligning with the wider range of local support that local authorities already offer.

The current weaknesses in the existing system administered by the Department for Work and Pensions have been taken into account in the design of the North Yorkshire scheme. In this regard reference has been made to the DWP Research Report No 625 (*The Social*

Fund: Customer experiences and perspectives: Qualitative research with Jobcentre Plus customers (2010)) and the DWP's EIA assessment 'Local welfare assistance to replace Social Fund Community Care Grants and Crisis Loans for general living expenses (October 2011).

Linked services

By moving away from the DWP's centralised and remote service, which tends to be only concerned with meeting the client's short-term needs, to a service which is delivered locally, clients will be better served. As well as providing short-term assistance the service will signpost clients to additional support (statutory and VCS sectors) to help them to address their underlying financial needs or problems or help them to improve their financial capability. This will also include those who are not eligible to receive the locally-based assistance.

Outcomes

The Local Assistance fund will support the North Yorkshire Community Plan priority of protecting and supporting vulnerable people by:

- Helping to meet the basic needs (food, shelter, warmth) of vulnerable individuals and families
- Doing this at the right time
- Improving their financial capability and independence
- Reducing their impact on statutory services and continued reliance upon statutory support

Who will benefit?

One-off practical support or other forms of assistance will be provided for:

- People moving into or remaining in the community (for example moving out of residential or institutional care to live independently, people moving to a new home which would be more suitable following an unsettled period and are being resettled by a council or third sector organisation, and people who need help to stay in their own home and not go into residential care or hospital).

families and vulnerable individuals facing exceptional pressure (such as family breakdown, unforeseen unemployment, domestic upheaval because of an unforeseen calamity, an unforeseen financial crisis, or because a family member has a long-term illness or disability). Families under exceptional pressure made up over 60% of the total spend of CCG awards in North Yorkshire according to the latest available figures (April 2011 to September 2011).

The County Council has received information from DWP about the funding transfer settlement. The annual budget for payments to clients in North Yorkshire is likely to be £793,346, with £167,640 to fund its administration in the first year (2013/14), falling to £153,660 in the second (2014/15). A further £7,933 will be provided for set up costs in 2012/13. All figures are indicative at this stage because the final figure will be based on CCG and CL expenditure in North Yorkshire during 2012/13.

Managing the costs of the service (both service delivery and administration) within a fixed budget, with only indicative allocations at this stage and no information about likely levels of funding after March 2015 has needed to be taken into account when designing the local scheme. We have designed the criteria to ensure that the assistance goes to those people who require it most. The introduction of our more restrictive criteria does mean that some people who belong to a protected group will find that they are no longer eligible to receive assistance.

For people to qualify for assistance under the North Yorkshire scheme they will need to fulfil all the following criteria:

- have a local connection (as defined in the Housing Act 1996, that is have lived in North Yorkshire six months out of the last twelve months or not less than three years during the previous five year period, with some exceptions such as those fleeing domestic violence);
- be on means tested benefits or able to demonstrate

	<p>evidence of very low income;</p> <ul style="list-style-type: none"> • have limited capital; • meet vulnerability criteria (homeless / learning and physical disabilities / mental health problems / leaving institutions such as residential care or prison / domestic abuse / carers / drugs and alcohol dependency / families under exceptional pressure / people at risk of going into residential care or hospital); • be aged 16 or over; and • have a need within the scope of the fund that could not be met from other forms of support. <p>Under the DWP scheme for crisis loans people did not need to be on means tested benefits in order to apply.</p> <p>Analysis of calls received into the Customer Services Centre from when the scheme went 'live' (beginning of April 2013) to end July 2013 highlighted that a number of customers were calling in need of an emergency food parcel but who didn't meet all NYLAF criteria. These customers in the main were on a low income and had little or no money or food in the house, but did not fall within one of the recognised vulnerability categories. It was decided that the scheme criteria would be adjusted slightly from August 2013 to enable people in these circumstances to benefit from a food parcel on a one-off basis. This has, more recently, also been extended to provision of utility top-up on a one-off basis.</p>
<p>1.2 How do people use the policy/service?</p> <p>How is the policy/service delivered? How do people find out about the policy/service? Do they need specialist equipment or information in different formats? How do you meet customer needs through opening times/locations/facilities? Can customers contact your service in different ways? How do you demonstrate that your service/policy is welcoming to all groups within the community?</p> <p>Does the policy/service support customers to access other services?</p>	<p>How people currently use the service</p> <p>Currently people can apply for Crisis Loans for living expenses and rent in advance by making a telephone application or by completing an application form from the local JobCentre Plus office or by downloading the form from the Direct.gov website. All other Crisis Loan applications have to be made in writing by downloading the relevant form from the gov.uk website and posted or taken to the local Jobcentre Plus office.</p>

Do you charge for your services? Do these changes affect everyone equally? Do some customers incur greater costs or get 'less for their money'? Are there eligibility criteria for the service/policy?

How do you ensure that staff/volunteers delivering the service follow the Council's equality policies? Does the Council deliver this policy in partnership or through contracts with other organisations? How do you monitor that external bodies comply with the Council's equality requirements?

Currently if people have speech or hearing difficulties they can use a textphone number. All application forms are available in other languages or format such as Braille, large print or audio.

Currently people can apply for Community Care Grants by completing an application form. The form can be downloaded from the Direct.gov website.

If applicants are unhappy with a Crisis Loan or Community Care Grant decision they have the right to ask for a review within 28 days of the decision by writing to JobCentre Plus. If they are still unhappy with the outcome they can ask for a further review by a Social Fund Inspector.

Changes to be made to the service

Access to the North Yorkshire scheme will in most cases be through partner agencies with a specialism in the type of vulnerability that distinguishes the customer. So in contrast to the DWP scheme the North Yorkshire scheme will include a face-to-face element to enable customers' wider needs to be established, signposting to other services that will be able to help support clients' longer term needs. There will be no charge for the service.

For most customers the application process will not be telephone based. This is because we felt that it would replicate the weaknesses of the current DWP approach of remoteness to the customer. However, those applicants who are not able to access a local office for a referring organisation, will be able to telephone our Customer Contact Centre where staff will undertake telephone interview with the client. In such instances the applicant will still need to post back the form with relevant documentation to provide evidence of their eligibility. This is similar to people making an initial application for a Blue Badge by telephone. Also for people who have speech or hearing difficulties they will be able to use the BT Text relay service to contact the County Council and get more information on how to apply.

Changes made since April 2013 include phone-based applications through our third party provider for those who cannot access a

referring agency (for example because of physical disability of other access issue). The application form is part-filled by Charis Grants following a telephone interview and the form is then posted to the applicant to review and sign. The form must still be returned with documentary evidence that they fulfil all key criteria, but this method has helped to expedite the process more quickly for customers in these circumstances than the previous alternative of completing a hard copy form sent out in the post.

Details of how to apply, including the application form, will be available to download on the County Council's website or with a website link provided to the organisation that will be responsible for making the awards.

An information leaflet for customers has been developed and is available at www.northyorks.gov.uk/nylaf.

We anticipate that the DWP and JobCentre Plus are also likely to make referrals to the County Council direct or to our trusted partner agencies (e.g. district councils and housing associations).

For customers who require a translation service the County Council and district councils have access to Language Line. Language Line is our recommended telephone interpreting service. This is for where customers speak limited or no English.

Office opening hours will fit in with the office hours of the trusted partner agencies, chiefly the district councils but also likely to include the housing associations. Opening times (excluding bank holidays) for the district councils are as follows:

Craven District Council
9am to 5pm on Mondays to Thursdays
9am to 4pm on Fridays

Hambleton District Council
8.45am to 5.15pm on Mondays to Thursdays.
8.45am to 4.45pm on Fridays

Harrogate Borough Council
8.30am to 5pm on Mondays to Thursdays.
8.30am to 4.30pm on Fridays

Richmondshire District Council (Main Offices)
8.45am to 5.15pm on Mondays to Thursdays.
8.45am to 4.45pm on Fridays

Ryedale District Council (Ryedale House)
9am to 4pm on Mondays, Wednesdays, Thursdays and Fridays
10.30am to 4pm on Tuesdays for Council tax benefit and HTB enquiries to allow for staff training)

Scarborough Borough Council
8.30am to 5pm on Mondays, Tuesdays, Thursdays and Fridays
9.30am to 5pm each Wednesday to allow for staff training

Selby District Council
8.30am to 5pm Monday, Tuesday, Thursday
10.00am to 5pm on Wednesdays (to allow for staff training)
8.30am - 4.30pm on Fridays

North Yorkshire County Council

08.00am to 5.30pm Mondays to Fridays

The service is available from 8am to 5:30pm, Mondays to Fridays via NYCC's Customer Services Centre only. There is no authorised agency provision via district/borough council offices.

An emergency out-of-hours service will not be provided for customers wishing to apply to either elements of the local assistance. This is because the local assistance is intended to deal with the consequences of a crisis rather than responding directly to a crisis. We also want to minimise the number of repeat applications, which is an identified weakness under the DWP scheme as highlighted in the paragraph below. The County Council does not have a statutory

requirement to provide financial help in emergency situations outside office hours.

Jobcentre Plus provides an out-of-hours service. Since 2008 the service has not included out of hours during the normal working week. The hours are 10am to 4pm on weekends, statutory holiday and on other days when there is no service. The service is not intended to be an extension of normal office hours and is intended for those where there is a serious risk to their health or welfare of the individual or their family. Referrals to this service are made by the statutory welfare agencies such as Social Services, other welfare services dealing with vulnerable customers e.g. Shelter, and the Police. It is not intended for customers to be able to access this service directly and they should instead be referred via one of the welfare agencies. However the DWP acknowledged in 2008 that 45% of referrals came direct from customers who were often repeat applicants (*Source: DWP EIA on Out of Hours Service* <http://www.dwp.gov.uk/docs/outofhoursserviceeia.pdf>).

Applicants who cannot easily access a referring organisation will also be able to apply direct to the County Council, but will need to provide the same level of supporting evidence. The application will need to confirm that the other eligibility criteria (residence, means and need) are also met. The form and routes for referrals into the grant administration process will be agreed as part of the detailed design work.

The County Council intends to appoint an external provider to award the grants to applicants in accordance with the scheme's criteria.

Appeals against decisions are anticipated to be referred to the County Council's complaints procedure in the event that an initial review upholds the original decision and the appeal continues to be pursued.

The County Council's complaint procedure is documented below:

Stage 1

We will try to deal with your complaint informally. This means that you should phone, write, or take your complaint to the office or person who dealt with your enquiry. Our staff will do their best to resolve your complaint without you needing to do anything else.

Stage 2

If you have contacted the relevant officer about your complaint but they have not been able to put things right, or you are not happy with the way they handled your complaint, the next step is for you to contact the complaints coordinator for the directorate responsible for that service. The directorate complaints coordinator will write to you within five working days to let you know we have received your complaint and tell you what will happen next.

Stage 3

If you have been through stages 1 and 2 and are not happy with the way your complaint was dealt with, you can ask the County Council's chief executive to review the investigation. (If your complaint is about services in the chief executive's department, it will be reviewed by another senior member of staff).

Our corporate complaints coordinator will write to you within five working days to let you know we are reviewing your complaint. You will receive a full written reply within 20 working days. If this is not possible we will inform you within 20 working days and give you an indication of when a full reply will be sent.

Our complaints procedure is not a review or appeal procedure for you to challenge the merits of those decisions. Neither is it a way to ask for a review of a decision which goes against you following other proper procedures, such as a school admission appeal.

Stage 4

If you are still unhappy with the way your complaint was dealt with, or feel you were treated unfairly, you can contact the local government Ombudsman at

Telephone: 0300 061 0614

E-mail: advice@lgo.org.uk

Fax: 024 7682 0001

Text: 'call back' to 0762 480 3014

Write to: Local Government Ombudsman, PO Box 4771, Coventry CV4 0EH

The Ombudsman can only investigate your complaint if you believe that you have been caused injustice as a result of something the Council has or has not done (maladministration). The Ombudsman will expect you to have taken your complaint through the County Council's own procedures first. You can get a leaflet about the Ombudsman service from any of the nominated officers.

You can contact the Ombudsman's advice line on 0300 061 0614 or visit the website www.lgo.org.uk

The main components of grant administration for North Yorkshire's Local Assistance are expected to be:

- Detailed design of Local Assistance grant administration, to include:
 - Eligibility check
 - Needs assessment
 - Award process
 - Grant administration database
- The operation of North Yorkshire's Local Assistance grant administration, incorporating service reviews.

How do you monitor that external bodies comply with the Council's equality requirements?

Our district councils (the key trusted partner agencies) operate within relevant equalities legislation, including the Equality Act 2010 and the Public sector Equality Duty. **Our 'authorised agencies' consist of a range of public sector agencies and charities who all operate within the relevant equalities legislation.** The applicant will be asked to complete an equality monitoring form to help us check whether our application processes are working in a fair way or whether they are having negative equalities impacts and consequently need to be amended to remove or mitigate such impacts. Equality monitoring data will be detached from the application form / process and it will be made clear to applicants that they do not have to supply this data and that this will not affect their application in any way.

The organisation that wins the tender to make the award to customers will be required to conform to the County Council's Equalities requirements set out in the procurement and procedure rules and to collate equality monitoring information for both the applicants it makes awards to and those that it rejects for an award. **Review of equality monitoring data collected by Charis took place end of August 2013 – see Appendix A, attached.**

2. Understanding the Impact (using both qualitative and quantitative data)

Please consider issues around impacts (positive or negative) raised for **all protected characteristics** and show your evidence

2.1 What information do you use to make sure the service meets the needs of all customers?

What data do we use now? Is it broken down across protected characteristics (and are these categories consistent across all data sets)? How current is the data? Where is it from? Is it relevant?

What engagement work have you already done that can inform this impact assessment? Who did you talk to and how? What are the main findings? Can you analyse the results of this consultation across the protected characteristics? Are there differences in response between different groups? How has this changed the plans for the policy/service?

This section analyses the impact of replacing Community Care Grants and Crisis Loans for living expenses with the new locally-based assistance to be offered in North Yorkshire. Analysis has been undertaken on the basis of how the design of the scheme could have an impact in terms of gender, race, disability and age. The current system of grants and loans are of particular importance to people who are covered by equality legislation. This may be due to:

- having characteristics that make them more or less likely to take up either a Community Care Grant or a Crisis Loan
- take up and differential outcomes

In addition when applications are made for support for people moving into or remaining in the community criteria will be applied which are favourable towards some of our diverse groups because of the additional difficulties and expense which they face. For example:

if there is a disabled child in the household incurring higher care costs;

young people leaving Local Authority care; and

customers are providing support to vulnerable friends or relatives.

Gender

- **Crisis Loans**

Using the latest figures that are available for North Yorkshire (2011/12: April 2011 to September 2011), 53% of awards for Crisis Loan Items and 55% of awards for Crisis Loan Living Expenses were made to single males, 34% and 34% respectively to single females and 14% and 12% respectively to couples.

With the available data it is not possible to establish if the success rates

were the same for single males and females as opposed to a couple. However the DWP when carrying out its own EIA impact for Community Care Grants and Crisis Loans for living expenses found that nationally the success rates were the same for single males and females (76%) and 74% for a couple (using 2009/10 data).

- **Community Care Grant**

In April 2011 to September 2011 in North Yorkshire, 43% of Community Care Grant awards were made in respect to single females, 36% made in respect to single males and 21% made in respect to couples. Families under exceptional pressure (a single person or couple with a child) made up over 60% of the total spend of CCG awards.

With the available data it is not possible to establish if the success rates were the same for single males and females as opposed to a couple. However the DWP carried out its own EIA impact for Community Care Grants and Crisis Loans for living expenses and found that nationally the success rates for single females were higher (49%) than single males (42%) but lower than couples (53%) in 2009/10. The DWP found that single females who are more likely to be caring for children are advantaged by the current arrangements. During the assessment stage a higher number of women than men are seen as having sufficient needs to be awarded a Community Care Grant. The locally based assistance to be introduced in North Yorkshire has been designed to ensure that this will not change. This is underlined by the fact that a key focus of the scheme will be to help families with children (and vulnerable individuals) under exceptional pressure.

Gender Reassignment

The DWP does not hold information on its administrative systems on transgender persons. People who are in the process or have undergone a gender reassignment are not included in the list of vulnerable groups identified in North Yorkshire's scheme but we do not envisage that this protected group will experience an adverse impact. Detailed eligibility criteria are being developed to ensure that people who need the support most will receive it.

Age

Crisis Loans

Using the latest figures that are available for North Yorkshire (2011/12: April 2011 to September 2011), a small proportion of Crisis Loan Items and Crisis Loan Living Expenses were made in respect of customers under 18: 1% and 2% respectively. The largest proportion (37%) of awards made in respect of Crisis Loan Items was for customers between 25 to 34 years old. The largest proportion (34%) of awards made in respect of Crisis Loan Expenses was for customers between 18 to 24 years.

Under 18s should also benefit indirectly if their parents/guardians are successful in making an application.

The number of applications and awards for Crisis Loan Items and Crisis Loan Living expenses falls to between 0% and 1% (depending upon the precise age cohort and type of Crisis Loan) for 65 to 90 years and over. The DWP has stated in its own EIA that it does not have sufficient information to understand why older people are less likely to apply and be awarded a crisis loan. Localising the service may allow a higher take-up of the assistance especially in view of the fact that the County Council's adult social services clients will be referred to the assistance if they meet the eligibility criteria as will customers who apply for the assistance locally e.g. through district councils.

Children below the age of 18 will benefit indirectly by the fact that their parents have applied.

Community Care Grants

Between April to September 2011, the lowest proportions for awards were made in respect to those aged 90 and over (0%), followed by 80 to 89 years of age (1%) and under 18 (1%).

The DWP reported in its own EIA, however, that success rates are higher for those customers aged 45 and over. And that older people

are currently advantaged by the system in respect of higher success rates. We are not able at this stage to say if this will continue to be the case with the new locally-based scheme. Success rates will depend upon whether people meet the North Yorkshire scheme's eligibility criteria.

For both elements of the fund we will publicise the scheme to local groups representing older people e.g. Age UK.

Disability

Crisis Loans

The definition of disability used by the DWP is based on whether a benefit recipient has a disability marker on the administrative datasets which is added by advisers when a customer states they have a disability.

There are no published figures available for North Yorkshire for the number of awards made in respect of disabled people for Crisis Loans. However, nationally in 2009/2010, 31% of Crisis Loan final decisions were made in respect of disabled people. This represented an increase of 11% on the previous year. Overall success rates are very similar for disabled customers (76%) compared to non disabled customers (77%).

The DWP reports that there have been improvements in the number of disabled customers accessing Crisis Loans and notes that there is no evidence to suggest that this will change with the introduction of locally-based assistance.

We believe that people who are disabled will not be adversely affected by the scheme to be operated in North Yorkshire for support for people who do not have enough money to meet their or their family's immediate short-term needs in an emergency or as the result of a disaster (fire or flood etc). The scheme's qualifying 'vulnerability criteria' includes people with mental or physical disabilities. We will

publicise the scheme to disability action groups in the county. This may also involve these groups doing the initial eligibility checks in addition to the district councils.

Community Care Grants

There are no figures available for North Yorkshire for the number of awards made in respect of disabled people for Crisis Loans. Nationally in 2009/10, the DWP reports that 33% of Community Care Grant awards were made in respect of disabled people. This represented an increase of 12% on the previous year, which was probably due to the introduction of Employment and Support Allowance. The DWP reports that nationally the overall success rates are higher for disabled customers (48%) than for non-disabled customers (43%).

The DWP notes that disabled customers are currently well served by the Community Care Grant system and notes that there is no evidence to suggest that this will change with the introduction of locally-based assistance.

We believe that people who are disabled will not be adversely affected by the scheme to be operated in North Yorkshire for support to replace or purchase essential furniture and essential household items, and to pay for rent deposits/bonds etc. The scheme's qualifying 'vulnerability criteria' includes people with mental or physical disabilities. However as discussed above we will publicise the scheme to disability action groups in the county and it may be that these groups can carry out the initial eligibility check for their clients.

Ethnicity

Crisis Loans

There are no published figures available for North Yorkshire for the number of awards made in respect of different ethnic groups for Crisis Loans. Nationally in 2009/10, 79% of Crisis Loan awards were made in respect of white customers with some ethnic groups receiving less than 1% of the final decisions. The DWP reports that this was consistent with previous years' figures. Overall success rates were slightly higher

for white customers than other groups.

The 2009 population estimates by ethnic group showed that 95.3% of the population in North Yorkshire belonged to the ethnic group: White; 2% Asian or Asian British; 0.60% Black or Black British; 1.1% Chinese or Other Ethnic Group; and 1% Mixed.

The reason for the different levels of success rate for customers from different ethnic groups is not known. However it could be that in the past knowledge of the DWP scheme has been lower amongst Black and Minority Ethnic Groups than amongst other ethnic groups or there could be cultural issues as to why they have not applied.

We do not envisage that BME groups will experience an adverse impact under the local scheme and so have not included them in the list of vulnerable groups. However we will be working with the County Council's Community Cohesion Team to ensure that they can raise awareness of the scheme amongst the BME groups that they work with in the county.

The local connection criteria built into the North Yorkshire scheme means that recently arrived migrants will not be eligible to claim the local assistance. This is also the case under the DWP scheme. Those claiming asylum or humanitarian protection and who are destitute, are eligible to state support under the National Asylum Support Service, which provides for basic living such as accommodation and food. There are no **asylum seekers** housed in North Yorkshire through the Home Office dispersal system. There may be very small numbers of **refugees** who have moved here independently.

Community Care Grants

There are no published figures available for North Yorkshire for the number of awards made in respect of different ethnic groups for Community Care Grants. Nationally in 2009/10, 65% Community Care Grant awards were made in respect of white customers with some ethnic groups receiving less than 1% of the final decisions. The DWP reports that this was consistent with previous years. However, there is a

higher number of 'prefer not to say' or 'unknown' responses in this data set. Overall success rates are slightly higher for all ethnic minority customers (average of 46%) than white customers (average of 44%) and overall success rates have decreased at the same rate for ethnic minority and white customers from 2008/09 figures.

The DWP reports that customers from ethnic groups are currently well served by the Community Care Grant system and there is no evidence to suggest that this will change in a locally-delivered system.

As discussed above we do not envisage that BME groups will experience an adverse impact under the local scheme however we will work to raise awareness of the scheme amongst BME contacts in the county.

Sexual orientation

The DWP does not hold information on its administrative systems on the sexual orientation of claimants.

We do not envisage an adverse impact on these grounds through the introduction of the North Yorkshire scheme for either element (support to replace or purchase essential furniture and essential household items etc. and support for people who do not have enough money to meet their or their family's immediate short-term needs in an emergency or as the result of a disaster. We will however publicise the scheme to groups within the county representing Lesbian, Gay, Bi-Sexual and Transgendered people such as MESMAC and the Gender Trust

Religion or belief

The DWP does not hold information on its administrative systems on the religion or beliefs of claimants.

We do not envisage an adverse impact on these grounds through the introduction of the North Yorkshire scheme for either element of the scheme. However we will be publicising the scheme to our faith group

contacts in the county.

Marriage and Civil Partnership

The DWP does not hold information on its administrative systems on the civil partnership status of claimants.

We do not envisage an adverse impact on these grounds through the introduction of the North Yorkshire scheme for either element (support to replace or purchase essential furniture and essential household items etc. and support for people who do not have enough money to meet their or their family's immediate short-term needs in an emergency or as the result of a disaster.

Review of the scheme – August 2013 to November 2013.

In terms of using data to make sure that the service meets the needs of vulnerable people, the main data sources that we currently have access to are as follows:-

- **Monthly grant-making reports from our third party provider, Charis Grants Ltd.** This highlights numbers of applications received, awards made by district, types of award, awards by vulnerability and spend. It is reviewed each month both internally at NYCC and with Charis, to identify trends and any issues in terms of customer demand.
- **NYCC Customer Services call log data from Lagan.** This was analysed in detail for six-month review (Sept 2013) and will be analysed at regular intervals thereafter. This tells us how many people are calling NYCC for support, whether eligible for NYLAF or not. It also tells us a bit more about what people are saying they need.
- **Equality monitoring data from the NYLAF online form.** Customers are not mandated to complete an equality monitoring form but this does seek information from customers around all key characteristics such as gender, age, ethnicity and disability. Raw data from the Charis database was lifted in August 2013 and analysed to start to build a picture of the demographic of customers applying (see 2.2). This data is not received as part

	<p>of regular reporting from Charis but will be requested at regular (e.g. 6-month, 12-month) intervals.</p> <ul style="list-style-type: none"> • Feedback from partner agencies. This is more informal and ad-hoc in nature and all partner agencies (not just authorised agencies) have been invited to provide us with feedback and to advise on customers that they feel should be supported who aren't. We held a more formal six-month stakeholder review on 30th September 2013, which helped us to build on this feedback and get more data and input around any potential customer 'gaps' and to look at issues around supply and provision. <p>Appendix A provides a detailed breakdown of data received through the above mechanisms, what this analysis tells us and how it has been used to develop the scheme further in Q3.</p>
<p>2.2 What does the information tell you?</p> <p>Are there any differences in outcome for different groups e.g. differences in take up rates or satisfaction levels across groups? Does it identify the level of take-up of services by different groups of people? Does it identify how potential changes in demand for services will be tracked over time, and the process for service change?</p> <p>Please include data and analysis as an appendix</p>	<p>See above.</p> <p>In North Yorkshire more single men receive crisis loan awards than single women or couples. Nationally, the success rates for male and female applications are similar. It may be that more men than women apply for the crisis loan awards than women. If we find this to be the case we will try to identify why this might be and consider whether we need to target women to raise their awareness of the system.</p> <p>Community Care grants are awarded more often to couples and families.</p> <p>As we move to a new system we will be able to identify whether the spread of awards seems consistent with population and spread evenly across vulnerable groups.</p> <p>Younger people receive awards under the present system with crisis loans dominated by those aged 18 – 35 and Community Care Grants by over 45s. Older people are much less likely to apply.</p> <p>Numbers of disabled people receiving loans under the existing system have been increasing and we will collect management information to</p>

	<p>monitor whether this continues under the new scheme.</p> <p>As mentioned in section 2.1, North Yorkshire's population is predominantly White British but we do have a number of minority ethnic communities, including some well established communities and more recently arrived migrants from Eastern and Western Europe. We will monitor applications and awards made to see whether the relatively low number of applications nationally is mirrored here and if so what we can do to raise awareness of the scheme.</p> <p>See Appendix A for detailed analysis.</p>
<p>2.3 Are there areas where we need more information? How could we get this information?</p> <p>What data is available? Do other directorates, partners or other organisations hold relevant information? Is there relevant information held corporately e.g. compliments and complaints? Are there national datasets that would be useful? Is there relevant census data? Do you need to collect more data? How could you do this?</p> <p>Do you need to do more engagement work to inform this impact assessment? Have you identified information in other sections of this EIA that you need to assess the impact on different groups of people? What do you want to find out? Which existing mechanisms can you use to get this information?</p> <p>Please refer to the Community Engagement toolkit on the NYCC intranet</p>	<p>The analysis has been undertaken on the data that is available.</p> <p>Our own equalities monitoring will be undertaken as part of the regular monitoring cycle. However this information will only be available once the scheme has been introduced. The management information that we will collect will be on the core categories of:</p> <ul style="list-style-type: none"> • Gender • Age • Disability • Ethnicity <p>It would be useful to know more about potential reasons why older people may not be accessing the NYLAF and whether refinements need to be made to enhance this access. Contact has been made with AgeUK and other agencies to try to make better links.</p> <p>We also have little information about the extent to which customers of the NYLAF have been supported longer term with underlying issues experienced. The picture described by authorised agencies at the six-month review was fairly mixed as caseload is dependent on resources available. See also 2.4 below.</p> <p>We are also looking to refine the enquiry form used by customer services advisors to enable us to better analyse the needs of customers calling NYCC and identify whether they were also eligible and what support was suggested.</p>

2.4 How will you monitor progress on your policy/service, or take-up of your service?

What monitoring techniques would be most effective? What performance indicators or targets would be used to monitor the effectiveness of the policy/service? How often does the policy/service need to be reviewed? Who would be responsible for this?

Frequent reviews will be undertaken by the County Council to ensure that protected groups identified in the Equality Act 2010 are not adversely affected by the local scheme. The frequency of review will be three months in the first year and then six monthly thereafter.

Data analysis and feedback from applicants will be taken into account to assess unintended consequences for the protected groups, and the policy consequences for particular groups. We will monitor the level and type of appeals in order to assess if there are negative equalities impacts.

We will continue to review key data around applications, awards, target categories, etc, on a monthly basis with Charis Grants. We will seek further data around equality monitoring information regarding NYLAF applications at 12 months. The NYLAF governance group has also agreed to undertake a survey of a small number of individuals who have benefited from the NYLAF at around the 12 month mark; to identify what further support they have received and how they have benefited from it.

3. Assessing the Impact

Please consider issues around impacts (positive or negative) raised for **all protected characteristics** and show your evidence.

3.1 Has an adverse impact been identified for one or more groups?

Has this assessment shown anything in the policy, plan or service that results in (or has the potential for) disadvantage or discrimination towards people of different groups? Which groups?

Do some needs/ priorities 'miss out' because they are a minority not the majority? Is there a better way to provide the service to all sections of the community?

The introduction of our more restrictive criteria as outlined in section 1.1 does mean that some people who belong to a protected group will find that they are no longer eligible to receive assistance. However because we have designed the criteria to ensure that the assistance goes to those people who require it most, we have no reason to believe that anyone will lose eligibility to apply because of a protected characteristic.

The provision of local sites where people can apply face to face will minimise the disadvantage caused to people unable to apply independently online because of poor rural infrastructure or low literacy levels, which can accompany socio-economic disadvantage, ill-health, disability or lack of facility in English.

As discussed in section 1.2 we will allow telephone applications for applicants who are not able to access a local office or download the form from the website. This is likely to involve a higher proportion of older and disabled people. Also for people who have speech or hearing difficulties they will be able to use BT's Text Relay service. The Language Line facility will be provided by both the County Council and district councils for applicants who are not able to speak English.

As mentioned in section 2.4, frequent reviews will be undertaken by the County Council to ensure that protected groups identified in the Equality Act 2010 are not adversely affected by the local scheme.

3.2 How could the policy be changed to remove the impact?

Which options have been considered? What option has been chosen?

Not applicable. The introduction of our more restrictive criteria has been necessary in light of the limited budget that we have been provided with.

	<p>We will be seeking to address any negative impact arising from the introduction of the local scheme by targeting support to those who need it most and by signposting to alternative, longer term sources of support for those who are both eligible and ineligible to receive the assistance.</p> <p>Whilst we do not believe that protected groups will be more adversely impacted than other people we recognise that change can of itself cause confusion, particularly for people whose lifestyle is chaotic. We will try to minimise any such confusion about how to access the scheme by providing information about the scheme at our and district councils' local access points (in addition to our website). More specifically we will also work with key contacts and organisations that work with BME groups, people who are disabled, religious/faith groups, groups representing older people and Lesbian, Gay, Bi-Sexual and Transgendered people.</p> <p>We have modified the process for applications from individuals (where for example a person cannot physically access an authorised agency locally) to enable customers to undertake a mostly phone-based interview with our provider. The customer will still need to provide documentary evidence that they meet the key eligibility criteria, but this process has helped to provide more urgent access to support than the previous paper-based process did.</p> <p>Implementing a fast-track phone-based solution for the first food parcel and first utility top-up has also ensured that the most vulnerable received support more quickly.</p> <p>Additionally, we have ensured that those who are vulnerable but who do not meet all NYLAF criteria are able to benefit from a one-off food parcel and/or utility top-up if needed.</p>
<p>3.3 Can any adverse impact be justified?</p> <p>If the adverse impact will remain, can this be justified in relation to the wider aims of the policy or on the grounds of promoting equality of</p>	<p>Yes if the client does not meet the eligibility criteria for the fund. The limited pot of funding available means that funding has to be targeted at those facing greatest difficulty in managing their income.</p>

<p>opportunity for one target group?</p> <p>Please seek legal advice on whether this can be justified.</p>	<p>As discussed above we will signpost people to alternative, more longer-term sources of support. This will apply to people who are both eligible and ineligible to receive the assistance.</p>
<p>3.4 Are you planning to consult people on the outcome of this impact assessment?</p> <p>When and how will you do this? How will you incorporate your findings into the policy?</p>	<p>Consultation will be with key agencies around service design and implementation. These organisations (Citizens Advice Bureaux, Credit Union, RSL's, district councils) have a wealth of experience of working with a broad cross section of people (including the protected groups) who are facing financial pressures.</p>
<p>3.5 How does the service/policy promote equality of opportunity and outcome?</p> <p>Does the new/revised policy/service improve access to services? Are resources focused on addressing differences in outcomes?</p>	<p>By providing grants to vulnerable groups that the County Council has not supported before in this way.</p> <p>Obviously the reduction in available funding means that some people who would previously have received help may miss out. However, we believe that the operation of the North Yorkshire scheme will make it easier to access than the previous scheme. In addition, as well as providing short-term assistance the service will signpost clients to additional support (statutory and VCS sectors) to help them to address their underlying financial needs or problems or help them to improve their financial capability. This will also include those who are not eligible to receive the locally-based assistance – including the protected groups – which will help to mitigate the impact on any individuals who might have been eligible for help under the DWP scheme.</p>

[Equality Action Plan](#)

Action Plan

What are you trying to change (outcome)?	Action	Officer responsible	Deadline	Other plans this action is referenced in (e.g. Service Performance Plan, work plan)	Performance monitoring
Obtaining local data to inform future development & assess impacts on protected groups	Requesting equality monitoring data from applicants 6-month review complete - see Appendix A.		In place when start taking applications		Assess at review meetings then annually
Publicising scheme generally	Communications Plan developed Feb/March 2013. NYLAF customer leaflet developed and circulated to key agencies. NYLAF update bulletins continue to be developed on quarterly basis and circulated to agencies.		1 month before scheme rolls out		
Apparent low take up by older people	Publicise through special interest groups (Age UK etc)		1 month before scheme rolls out		

	Contact made with specialist agencies such as advocacy services and AgeUK to strengthen links.				
Apparent low take up by BME groups Ensure BME communities aware of scheme	<p>Liase with Community Cohesion Team & MEA Team</p> <p>Officers from Community Cohesion have received a briefing on the NYLAF.</p>		1 month before scheme rolls out		
Identify how customers of the NYLAF have been supported with longer term issues.	Sample survey		Circa 12 months into scheme		