



EQUALITY IMPACT ASSESSMENT TOOL

The council has a statutory duty to consider the impact of its decisions on age, disability, gender reassignment, pregnancy & maternity, race, religion or belief, sex (gender) and sexual orientation.

The council also has a duty to foster good relations between different groups of people and to promote equality of opportunity.

Completing an EIA is the simplest way to demonstrate that the council has considered the equality impacts of its decisions and it reduces the risk of legal challenge. EIAs should be carried out at the earliest stages of policy development or a service review, and then updated as the policy or review develops. EIAs must be undertaken when it is possible for the findings to inform the final decision. Keep all versions of your EIA. An EIA should be finalised once a final decision is taken.

When you should undertake an EIA:

- You are making changes that will affect front-line services
- You are reducing the budget of a service, which will affect front-line services
- You are changing the way services are funded and this may impact the quality of the service and who can access it
- You are making a decision that could have a different impact on different groups of people
- You are making staff redundant or changing their roles (particularly if it impacts on frontline services).
- EIAs also need to be undertaken on how a policy is implemented even if it has been developed by central government (for example cuts to grant funding).

Who should undertake the EIA:

- The person who is making the decision or advising the decision-maker

Guidance and tools for completing EIAs are available on the WIRE:

<https://officesharedservice.sharepoint.com/sites/intranet/wcc-comms/Pages/Equality-Impact-Assessments-.aspx>

An EIA e-learning module is available for all Westminster staff:

www.learningpool.com/westminster/course/view.php?id=159

When you have completed an EIA, please send the final copy to Equalities@westminster.gov.uk

It is the responsibility of the service to complete an EIA to the required standard and the quality and completeness of EIAs will be monitored by EMT.

Title

The updated Discretionary Housing Payment Policy

What are you analysing?

- What is the purpose of the policy/project/activity/strategy?
- In what context will it operate?
- Who is it intended to benefit?
- What results are intended?
- Why is it needed?

What is being analysed

This Equalities Impact Assessment (EIA) assesses the potential impact of the new Discretionary Housing Payment (DHP) policy. The current policy has been in place since 2015.

Background to Discretionary Housing Payment

The DHP scheme was introduced in 2001 to enable local authorities to make financial awards of addition to housing benefit (or the housing element of Universal Credit), where there is a shortfall between an applicant's benefit and their rent.

Local authorities receive a sum annually from government to run a DHP scheme, based on a formula, and are able to add to this sum subject to limits.

Reason for the updated DHP policy

In 2017/18 the council's allocation of funding for a DHP scheme from government reduced to £1.4m, from £2.67m in 2016/17, which is a 47% cut. The council has historically received one of the largest allocations of DHP in the past as it has been one of the local authorities most impacted by welfare reform.

For 2017/18 £1m has been allocated by the council to top up the DHP budget to £2.4m. However, welfare reform has been in place now for several years and the council's overall objective is to work towards managing on the government's allocation for a DHP scheme.

A new policy is needed to:

- Help meet the above objective
- To ensure resources are targeted where they are most needed
- To align the DHP policy with other policies i.e. the council's new homelessness policy framework – particularly the Accommodation Placement Policy which prioritises certain homeless households for accommodation in London (these households might need to be supported by DHP in the longer term.) A link to this policy is below.

<http://committees.westminster.gov.uk/documents/s21008/Appendix%204%20-%20Accommodation%20Placement%20Policy.pdf>

The new policy approach

This EIA focuses on four main policy changes in the new policy compared with the existing policy approach.

1) There is a greater focus on awards being linked to action plans which will set out the actions an applicant needs to take for the duration of an award, to move towards not being reliant on DHP as it is not a long term solution. Action plans are already part of the current policy but they will be more

integrated across the council and more rigorously monitored. It is anticipated that this approach will lead to a reduction in successful repeat claims, and repeat claims in future will only generally be accepted where an applicant needs more time to carry out the agreed actions, or in special circumstances described in 2 below. Currently 33% of applicants re-apply for DHP.

2) Repeat claims are likely to only be agreed where it is unreasonable to expect an applicant living in the private rented sector to move to alternative housing outside Westminster due to them, or a member of their household, having very high health, social or welfare needs. The criteria on which this will be assessed replicate those in the council's Accommodation Placement Policy for Homeless Households which prioritises certain homeless households for private sector accommodation in Westminster and central London. Currently repeat claims are restricted but the new approach sets out more clearly when they may be successful.

3) DHP will no longer be promoted in the Policy as available for rent in advance and deposit. In addition it will no longer be available to cover landlord incentive payments.

4) DHP for low income workers has been refocused and in the main will only be available for those moving into work for the first time, or returning to work after a break of a year, to help with this transition. Awards will also taper off over time to help the applicant move gradually towards not relying on DHP. Awards to other low income workers will only be available in exceptional circumstances.

Details of the lead person completing the screening/EIA

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- (ii) Position: Principal Policy Officer
- (iii) Unit: Policy, Performance and Communications
- (iii) Contact Details: cherdman@westminster.gov.uk

Date sent to Equalities@westminster.gov.uk

Version number and date of update

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SECTION 1: Initial screening: Do you need to complete an Equality Impact Assessment (EIA)?

Not all proposals will require an EIA, this initial screening will help you decide if your project or policy requires a full EIA by looking at the potential impact on any equality groups.

1.1	Does the project, policy or proposal have the potential to disproportionately impact on any of the following groups? If so, is the impact positive or negative?																					
	<p>What is being assessed The four changes described above are being assessed in this EIA.</p> <p>Groups affected by the policies Any changes to the DHP policy will impact on its recipients. The following tables show the groups that are more likely to be disproportionately affected by the changes as they are more likely to claim DHP and they are represented in bold.</p> <p>Race</p> <p><i>Table 1 – ethnicity proxy information</i></p> <table border="1" data-bbox="284 920 986 1397"> <thead> <tr> <th data-bbox="284 920 517 1077">Ethnicity</th> <th data-bbox="517 920 770 1077">Homeless Households (lead applicant)* 2016</th> <th data-bbox="770 920 986 1077">Westminster Population (2011 Census)</th> </tr> </thead> <tbody> <tr> <td data-bbox="284 1077 517 1122">White</td> <td data-bbox="517 1077 770 1122">21%</td> <td data-bbox="770 1077 986 1122">62%</td> </tr> <tr> <td data-bbox="284 1122 517 1167">Black</td> <td data-bbox="517 1122 770 1167">25%</td> <td data-bbox="770 1122 986 1167">7%</td> </tr> <tr> <td data-bbox="284 1167 517 1211">Arab</td> <td data-bbox="517 1167 770 1211">21%</td> <td data-bbox="770 1167 986 1211">7%</td> </tr> <tr> <td data-bbox="284 1211 517 1256">Asian</td> <td data-bbox="517 1211 770 1256">16%</td> <td data-bbox="770 1211 986 1256">12%</td> </tr> <tr> <td data-bbox="284 1256 517 1301">Mixed</td> <td data-bbox="517 1256 770 1301">3%</td> <td data-bbox="770 1256 986 1301">5%</td> </tr> <tr> <td data-bbox="284 1301 517 1397">Other (includes Chinese)</td> <td data-bbox="517 1301 770 1397">13%</td> <td data-bbox="770 1301 986 1397">7%</td> </tr> </tbody> </table> <p>*The data does not include households where their ethnic origin is unknown</p> <p>Ethnicity is not part of the Housing Benefit assessment and is not collected separately by the council. However, as DHP recipients might share some of the same characteristics as households that are accepted by the council as homeless, the above table has been included in this EIA as a proxy and is indicative only. It shows that Black, Arab, Asian, Mixed and Other households might be more impacted by the DHP policy changes.</p> <p>Age</p> <p>Both the 25-44 and the 45–64 age group are disproportionately represented among lead DHP recipients, the latter group significantly so. Conversely, younger and older age groups are less directly affected. Table 2 shows that households with children are disproportionately represented among DHP recipients.</p>	Ethnicity	Homeless Households (lead applicant)* 2016	Westminster Population (2011 Census)	White	21%	62%	Black	25%	7%	Arab	21%	7%	Asian	16%	12%	Mixed	3%	5%	Other (includes Chinese)	13%	7%
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Other (includes Chinese)	13%	7%																				

Table 2 – age

Age	DHP recipients 2016/17	Westminster Population (2015 Mid-year estimates)
16-24	4%	8%
25-44	47%	40%
45-64	43%	22%
65-74	3%	6%
75+	2%	5%

Gender

Table 3 – gender

	DHP recipients 2016/17	Westminster Population (2015 Mid-year estimates)
Women	73%	48%
Men	27%	52%

Women are disproportionately represented among lead recipients.

Household composition

Table 4 - households with children

	DHP recipients 2016/17	Westminster Population (2011 Census)
Single people/couples	43%	81%
Households with children	55%	19%
Lone parents	40%	6%

Households with children and lone parents are disproportionately represented among DHP recipients.

Disability

12% of DHP recipients receive Disabled Living Allowance which is an indicator of disability (but this won't capture all households which include a member with a disability). While borough wide data is not directly comparable with the criteria for Disabled Living Allowance it is worth noting that 9% of the working age Westminster population is estimated to have a serious or moderate physical disability¹, therefore it could be assumed that people with disabilities are over represented among DHP recipients.

¹ PANSI information 2015

Sexual orientation and transgender/gender reassignment

Information about the sexual orientation of DHP recipients as it is not part of the HB assessment and is not collected separately by the council. It is estimated that up to 10% of the Westminster population may be gay, lesbian, bi sexual or transgender (LGBT). Survey evidence published in 2009 (Mapping LGTB Westminster: Investigating the Needs and Experience of LGTB People in Westminster) suggests that the proportion of LGTB people living in private and social rented housing in Westminster is similar to that of residents more generally and this tends to confirm that this can be used as an estimate for DHP recipients². There is no evidence to suggest that LGBT people are disproportionately represented among those receiving DHP.

Religion and belief

Data about the religion and belief of DHP recipients are not recorded, although it is possible to draw some conclusions from the ethnicity information in table 1. It is likely that the diversity of ethnic origin this shows will be reflected in the range of religions and beliefs among DHP recipients.

Income/non working households

All DHP recipients have low incomes as they need to be in receipt of Housing Benefit to qualify so will be impacted by the changes. Across all tenures in Westminster 23% of households receive Housing Benefit. The annual average household income in Westminster was £43k³ in 2013.

Initial assessment of impacts

The EIA notes that there could potentially be negative impacts for some households arising from the revised policy and well as some positive ones.

Impacts relating to private rented sector offers

1. **Greater focus on awards being linked to action plans.** This is likely to have a positive impact on applicants as officers will be working with them to help identify the steps needed in order for them to pay their rent in the longer term without DHP. They will also be supported with some of these steps where needed. Overall it is anticipated that these enhanced action plans will, amongst other things, result in households moving to more affordable accommodation in a planned way, which will provide greater stability. It is also anticipated that the actions plan will help applicants to find work or be in a better position to work as they will be referred to Westminster Employment Service. Working for more than 16 hours each week can exempt an applicant from the households benefit cap which will give them greater housing options in the longer term.
2. **Repeat claims are likely to only be agreed where it is unreasonable to expect an applicant to move to alternative housing due to them, or a member of their household having, very high health, social or welfare needs.** While the new policy approach ensures that the most vulnerable will continue to receive DHP to enable them to

² Gold, D & Cowan, K. (2009) Mapping LGBT Westminster: Investigating the needs and experiences of LGBT people in Westminster – A report commissioned by Westminster City Council, GALOP

³ CACI Paycheck

continue living in Westminster – some households with lower level health, welfare and support needs might be negatively impacted. These negative impacts might disproportionately impact people with children, lone parents particularly, people with low level disabilities or elderly people that might find it harder to move to a new area as they have established support networks here.

3. **No longer promoting DHP for rent in advance and deposits.** No impact is expected as provision is available elsewhere. .
4. **Refocusing DHP mainly for low income workers moving into work for the first time or returning to work after a break.** This approach should have a positive impact as it will help those that have been out of work for a long time with the transition into it. The new way of structuring payments i.e. that they taper off over time will also help with this transition. The new approach should particularly help groups of households that find it harder to move into work i.e. lone parents, people with young children etc. It might negatively impact other low income workers however who are experiencing problems with paying their rent.

Overall assessment of impacts

	None	Positive	Negative	Not sure
Disabled people	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Particular ethnic groups	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Men or women (include impacts due to pregnancy/ maternity)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
People or particular sexual orientation/s	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
People who are proposing to undergo, are undergoing or have undergone a process or part of a process of gender reassignment	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
People on low incomes	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
People in particular age groups	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Groups with particular faiths and beliefs	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Are there any other groups that you think may be affected negatively or positively by this project, policy or proposal? Yes, children and carers		<input type="checkbox"/>	<input type="checkbox"/>	

If the answer is “negative” or “unclear” consider doing a full EIA

1.2	What do you think that the overall NEGATIVE impact on groups and communities will be?				
	<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 50%; text-align: center;">None/ Minimal</th> <th style="width: 50%; text-align: center;">Significant</th> </tr> </thead> <tbody> <tr> <td style="text-align: center; vertical-align: top;"> <input type="checkbox"/> None or minimal impact would be where there is no negative impact identified, or where there will be no change to the services for any groups. </td> <td style="text-align: center; vertical-align: top;"> <input checked="" type="checkbox"/> Significant impact would be where there is an impact is identified that has substantial impact on any groups. </td> </tr> </tbody> </table> <p style="text-align: center;">If the answer is “significant” consider doing a full EIA</p>	None/ Minimal	Significant	<input type="checkbox"/> None or minimal impact would be where there is no negative impact identified, or where there will be no change to the services for any groups.	<input checked="" type="checkbox"/> Significant impact would be where there is an impact is identified that has substantial impact on any groups.
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1.3	Using the screening information in questions 2.1 and 2.2, should a full EIA be carried out on the project, policy or proposal				
	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
1.4	How have you come to this decision?				
	A full EIA is needed as there are a mixture of both positive and negative impacts on different groups so the overall impact is unclear.				

EQUALITY IMPACT ASSESSMENT

SECTION 2: BUILDING AN EVIDENCE BASE

<p>2.1</p>	<p>Build up a picture of who uses/will use your service or facility and identify who are likely to be impacted by the proposal</p> <ul style="list-style-type: none"> <i>If you do not formally collect data about a particular group then use the results of local surveys or consultations, census data, national trends or anecdotal evidence (indicate where this is the case). Please attempt to complete all boxes.</i> <i>A baseline of data is available here</i> 	
<p>How many people use the service currently? What is this as a % of Westminster’s population?</p>	<p>Currently c.1,400 households annually receive DHP which is 1.3% of all Westminster households.⁴</p>	
<p>Age</p>	<p>People in the 25-44 and 45 – 64 age groups will be disproportionately affected by policy change and direction as are more likely to receive DHP (see table 2 in Section 1). This group is also more likely to have children living with them.</p>	
<p>Disability</p>	<p>People with disabilities might be disproportionately impacted by the policy change and direction as they may be more likely to receive DHP.</p>	
<p>Gender</p>	<p>As table 3 in Section 1 shows, women are more likely to be affected by the policy change and direction as they are more likely to receive DHP. Women are also more likely to be lone parents⁵ and lone parents are more likely to be impacted by the new policy. Women are also more likely to be carers⁶, who can be impacted by moves away from the people they are caring for.</p>	
<p>Children</p>	<p>Households claiming DHP are more likely to have children compared with households overall in Westminster so are more likely to be affected by the policy change and direction (see table 4 in section 1).</p>	
<p>Race</p>	<p>Black, Arab, Asian, Other and Mixed households might be more impacted by the DHP policy change and direction (see table 1 in section 1).</p>	
<p>Religion or belief</p>	<p>Specific information is not available, although proxy data on ethnicity suggests that there is likely to be considerable diversity of religion/belief among DHP recipients.</p>	

⁴ Based on 105,772 households (Census 2011)

⁵ According to [Gingerbread](#), around 90% of single parents are women

⁶ Carers UK estimates that 58% of carers are women.

	Sexual orientation	It is estimated that 10% of DHP recipients may be lesbian, gay, bi sexual or transgender (LGBT) – a similar proportion to the Westminster population as a whole.
	Gender Re-assignment	Specific information is not available.
	Pregnancy and Maternity	People with children are more likely to be affected by the policy change as they are over represented in DHP recipients (see table 4 in Section 1).
	Marriage and Civil Partnership	Lone parents are more likely to be affected by the policy change and direction as they are over represented in DHP recipients (see table 4 in section 1).
	Low incomes/non working households	DHP recipients all have low incomes as they are all in receipt of Housing Benefit.
2.2	Are there any equality groups that are overrepresented in the monitoring information relative to their size of the population? <i>If so, this could indicate that the proposal may have a disproportionate impact on this group even if it is a universal service. Information about Westminster’s population is on the Equalities page on the WIRE.</i>	
	<p>In summary, the following households are more likely to directly impacted by updated DHP policy and direction:</p> <ul style="list-style-type: none"> ○ Black, Arab, Asian, Other and Mixed ethnic groups ○ The 25-44 and 45 – 64 age groups (these group are also more likely to have children) ○ People with disabilities ○ Women ○ Households with children ○ Children ○ Lone parents ○ Low income households/those not working. 	
2.3	Are there any equality groups that are underrepresented in the monitoring information relative to their size of the population? <i>If so, this could indicate that the service may not be accessible to all groups or there may be some form of direct or indirect discrimination occurring.</i>	
	<p>Overall, the following groups are less likely to be directly impacted by the updated DHP policy:</p> <ul style="list-style-type: none"> ○ White ethnic groups ○ People over 65 ○ People under 25 ○ Men 	

SECTION 3: ASSESSING THE IMPACT

In order to be able to identify ways to mitigate any potential impact it is essential that we know what those potential impacts might be.

<p>3.1</p>	<p>Consultation Information <i>This section should record the consultation activity undertaken in relation to this project, policy or proposal</i></p>
	<p>Who have you consulted with? The new policy and approach has been discussed with:</p> <ul style="list-style-type: none"> ○ Senior officers in the council's: Adult Social Care and Children's Services, CityWest Homes, Employment Team and Housing Team ○ The council's Welfare Reform Board (May 2017) which is made up of a range of council officers including from: Adult Social Care, Children's Services, Housing, CityWest Homes and Public Health. <p>The updated DHP policy follows a new homelessness policy framework in January 2017. The new framework included a Private Rented Sectors Offer policy which set out the groups that would be prioritised for private rented sector accommodation in Westminster. The new DHP policy mirrors these criteria in relation to DHP renewal for households affected by LHA restrictions and the overall benefit cap. In summary those that do not meet these criteria (which is on health, welfare and social grounds) to remain in Westminster, will be expected to find alternative cheaper accommodation they can afford without DHP. This new policy framework was widely consulted on across the council and a full EIA as carried out and is available at the following link:</p> <p>http://committees.westminster.gov.uk/documents/s21009/Appendix%20-%20EIA.pdf</p>
<p>3.2</p>	<p>What might the potential impact on individuals or groups be? <i>Consider disability, race, gender, sexual orientation, transgender, age, faith or belief and those on low incomes and other excluded individuals or groups</i></p>
	<p>This section builds on the initial assessment of impacts in Section 1:</p> <p>Disability</p> <ul style="list-style-type: none"> • Some DHP applicants – with mental health problems – for example might find it harder to engage with the action plans i.e. to find alternative accommodation or to find work and this might be a potentially negative impact • Some DHP applicants and households with low level disabilities (that don't meet the criteria for longer term DHP support) might need to move outside Westminster and London to find affordable accommodation. The impact of this could be negative as they are more likely to be receiving treatment, care and support, which would have to be transferred which would be disruptive. • Not renewing DHP might result in homelessness which is generally recognised to have a negative impact. <p>Race</p> <ul style="list-style-type: none"> • Households from ethnic minority backgrounds may be disproportionately affected as homeless data – which can be used as a proxy - indicates they are more likely to need larger homes which are less affordable and available within benefit levels, in the private rented sector in Westminster. This might inevitably result in them having to move at a

greater distance from Westminster to find affordable homes – if not supported by DHP. There may also be fewer cultural facilities for some ethnic groups in locations outside London if they were to move there.

- Not renewing DHP might result in homelessness.

Faith/Belief

- Households with different faiths and beliefs could be potentially negatively affected by moving outside London which might be necessary in order to find affordable properties within benefit levels, as it might be more difficult to access places of worship and other religious or cultural institutions.
- Not renewing DHP might result in homelessness.

Gender

- People with children, and lone parents (who are more likely to be women) in particular, will potentially be negatively affected if they need to move outside Westminster and London in order to find alternative accommodation which is affordable within benefit levels. This is because they are more likely to rely on local support networks for child care arrangements. On the other hand, the aim of the DHP policy is that DHP is offered as a short term solution to enable households to move in a planned way to more sustainable housing in the longer term.
- Not renewing DHP might result in homelessness.

Age - Children

- Children will potentially be negatively affected if not renewing DHP results in them having to move outside of Westminster and London as they will be more likely to have to start new schools, which can be disruptive. On the other hand, as stated above the aim of the new policy and approach is to assist households to move in a planned way to more affordable and sustainable accommodation in the longer term.
- Not renewing DHP might result in homelessness which is recognised to have a disproportionately impact on children.

Age – Older people

- Not renewing DHP might have a disproportionate impact on older people as it could result in them having to move outside Westminster and London away from support networks.
- Not renewing DHP might result in homelessness.

Sexual Orientation

- Information on sexual orientation is not available but moves outside London, as a result of DHP not being renewed, may impact on the support networks and services available to Lesbian, Bisexual, Gay and Transgender groups, although there is no actual evidence of this.
- Not renewing DHP might result in homelessness.

Transgender

- Information on transgender status of applicants is not available, but moves outside London may impact on them negatively if there are fewer support networks and services available to them, although there is no actual evidence of this.
- Not renewing DHP might result in homelessness.

Low income groups

Low income households that are reliant on Housing Benefit are more likely to have to move outside Westminster, if their DHP is not renewed, to find alternative accommodation as the difference between benefit levels and rents is significant in Westminster (see the table below).

The relationship between Local Housing Allowance rates and private rents in Westminster 2016					
Beds	Single room	1	2	3	4
Lower quartile rents per week ⁷	£175	£365	£481	£675	£898
Central London LHA rate per week	£136.52	£260.64	£302.33	£354.46	£417.02
In London the overall benefit cap for non-working single people and couples is £296.35 per week and £442.31 per week for couples and families					

Mitigation measures have been developed to reduce the impact the new DHP policy and approach. (see Section 4).

⁷ GLA Rents Map Information March 2016

SECTION 4: REDUCING & MITIGATING IMPACT

As a result of what you have learned, what can you do to minimise the impact of the proposed changes on equality groups and other excluded / vulnerable groups, as outlined above?

4.1	Where you have identified an impact, what can be done to reduce or mitigate the impact? (Remember to think about the Council as a whole, another service area may already be providing services which can help to deal with any negative impact).	
	Following the identification of some potential negative impacts above the DHP policy has been adapted to reduce or mitigate these impacts.	
	Column A – Protected Group	Column B – what changes can be made to remove or reduce barriers or negative impacts (Remember to think about the Council as a whole, another service area may already be providing services which can help to deal with any negative impact).
	All households	<ul style="list-style-type: none"> The actions that need to be taken, in order for the applicant not to rely on DHP in the long term, will be tailored to the needs of each household. The length of the DHP award, while generally will be for 6 months, might also be tailored to individual circumstances although will not exceed 52 weeks Renewal claims will generally be agreed where actions are being adhered to and more time is reasonably needed to complete them The Housing Benefit Policy Team will seek the views of other services, where appropriate, when deciding actions required. For example they will work with the Westminster Employment Service (if the plans involve seeking work), the Housing Options Service (if the action plans involve looking for cheaper alternative accommodation or the applicant is at risk of homelessness) and Adult and Family Services (if the applicant is vulnerable and is receiving support from them) The amount the council contributes to the DHP scheme will be assessed annually and this review will take into account the extent to which the new policy is meeting its desired objectives
	Disability	<ul style="list-style-type: none"> The actions needed not to rely on DHP in the longer term will take into account factors relating to the applicant/s disability, or the disability of a household member. Tailored support will be available from the Housing Options Service if the action plan involves looking for alternative accommodation and from the Westminster Employment Service if it involves seeking work.
	Race	<ul style="list-style-type: none"> The actions needed not to rely on long term DHP will take into account the needs of households from different ethnic backgrounds. They might for example acknowledge that the household needs additional support from Westminster Employment Service, where English is not their first language for example
	Faith/Belief	<ul style="list-style-type: none"> See factors relating to all households
	Gender	<ul style="list-style-type: none"> The actions required not to rely on longer term DHP will take into account the needs of single parents in particular. They will for example acknowledge that a single parent might need additional support from Westminster Employment Service to find work. . The actions required with regard to finding alternative accommodation will also take into account the support needs of single parents to find alternative accommodation and support to do

		this will be available where needed
Age - Children		<ul style="list-style-type: none"> The actions required not to rely on long term DHP will take into account the needs of children for example if moving involved a child having to change schools.
Age – Older people		<ul style="list-style-type: none"> The actions required not to rely on long term DHP will take into account the needs of older people. Where there is a need for them to look for alternative accommodation advice will be given about sheltered housing which has a much shorter waiting list than other forms of social housing
Sexual Orientation		<ul style="list-style-type: none"> See factors for all households
Transgender		<ul style="list-style-type: none"> See factors for all households
Low income groups		<ul style="list-style-type: none"> See factors for all households

4.2 Now that you have considered the potential or actual effect on equality, what action are you taking?

<input type="checkbox"/>	1. No major change (no impacts identified)	Your analysis demonstrates that the policy is robust and the evidence shows no potential for discrimination and you have taken all appropriate steps to advance equality & foster good relations between groups.
<input type="checkbox"/>	2. Adjust the policy	You will take steps to remove barriers or to better advance equality.
<input checked="" type="checkbox"/>	3. Continue the policy (impacts identified)	You will adopt your proposal, despite any adverse effect provided you are satisfied that it does not unlawfully discriminate and it is justified.
<input type="checkbox"/>	4. Stop and remove the policy	There are adverse effects that are not justified and cannot be mitigated. The policy is unlawfully discriminating.

4.3 Please document the reasons for your decision

The new DHP policy is justified as it aims to achieve the important objective that applicants become self sufficient and do not need to rely on DHP in the longer term, which should never be more than a temporary solution. It is anticipated that this will provide them with greater stability, particularly as the DHP annual budget is uncertain. Applicants will be advised of the new policy and the focus will be on working with them and other services to identify ways in which they will not need to rely on DHP and on providing support for this where it is needed.

The new policy acknowledges that some vulnerable people will need to receive DHP in the longer term and as would not be feasible for them to move to cheaper accommodation due the impact might have on them or a member of their household. The criteria for this is based around severe health and welfare needs and has been aligned with the council's new homelessness policy framework (which sets out households that should be prioritised for in borough private rented accommodation).

SECTION 5: ACTION PLAN

This section is for actions related to any of the 9 protected characteristic: Age, Disability, Gender, Gender reassignment; Pregnancy & maternity, Race, Sexual Orientation or Religion/Belief

5.1	Complete the action plan if you need to reduce or remove the negative impacts you have identified, take steps to foster good relations or fill data gaps. <i>Please include the action required by your team/unit, groups affected, the intended outcome of your action, resources needed, a lead person responsible for undertaking the action (inc. their department and contact details), the completion date for the action, and the relevant RAG rating: R(ed) – action not initiated, A(mber) – action initiated and in progress, G(reen) – action complete.</i> NB. Add any additional rows, if required.						
	Action Required	Equality Groups Targeted	Intended outcome	Resources Needed	Name of Lead, Unit & Contact Details	Completion Date (DD/MM/YY)	RAG
	Assess the impact of new policy approach compared with the previous policy	All	To understand the impact of the new policy approach	Existing	Gwyn Thomas Benefits Policy Manager	April 2018	
	Review council resources for the DHP scheme	All	To assess if further resources for 2018/19 are needed	Existing	Gwyn Thomas Benefits Policy Manager	April 2018	

THIS SECTION TO BE COMPLETED BY THE RELEVANT SERVICE MANAGER

SIGNATURE:
FULL NAME:
UNIT: EMAIL & TELEPHONE EXT:
DATE:

WHAT NEXT?

It is the responsibility of the service to complete an EIA to the required standard and the quality and completeness of EIAs will be monitored by EMT.

All completed EIAs should be sent to: Equalities@westminster.gov.uk