

DRAFT - Equality Impact Assessment (EIA) Template: Service Reviews/Service Changes

Title of spending review/service change/proposal	Universal Credit Full Service rollout
Name of division/service	Revenues & Customer Support
Name of lead officer completing this assessment	James Rattenberry, Principal Policy Officer
Date EIA assessment completed	7 January 2019
Decision maker	Director of Finance Alison Greenhill / Head of Service Caroline Jackson
Date decision taken	27 July 2019

EIA sign off on completion:	Signature	Date
Lead officer	James Rattenberry	7 January 2019
Equalities officer	Hannah Watkins	7 January 2019
Divisional director	Alison Greenhill	27 August 2019

Please ensure the following:

- (a) That the document is understandable to a reader who has not read any other documents, and explains (on its own) how the Public Sector Equality Duty is met. This does not need to be lengthy, but must be complete.

- (b) That available support information and data is identified and where it can be found. Also be clear about highlighting gaps in existing data or evidence that you hold, and how you have sought to address these knowledge gaps.
- (c) That the equality impacts are capable of aggregation with those of other EIAs to identify the cumulative impact of all service changes made by the council on different groups of people.

1. Setting the context

Describe the proposal, the reasons it is being made, and the intended change or outcome. Will current service users' needs continue to be met?

Universal Credit (UC) is a new benefit that is replacing six existing legacy benefits. UC Live Service (UC LS) was introduced from 25 January 2016 in Leicester for single, childless claimants making a new claim and who would otherwise have made a new claim for jobseeker's allowance. All applications for Universal Credit are made online.

Universal Credit Full Service (UC FS) was introduced in Leicester from 13 June 2018 and affects a substantially greater number of working age people – over 7,500 at the end of November 2018.

Universal credit will ultimately replace income based jobseeker's allowance, income related employment and support allowance, income support, working tax credit, child tax credit and housing benefit for working-age claimants. It will not replace contribution-based jobseeker's allowance and employment and support allowance, non-means tested disability benefits such as PIP, and pensioner benefits.

Most working age households, who would otherwise make a new claim for any of the above benefits, or who experience a major change in circumstances such as taking on a new tenancy, will now instead claim UC.

The only exceptions to this will be households with three or more children, who are anticipated to become eligible from 1 February 2019, and those in Supported Exempt Accommodation. Another exception is expected to be created for heritage benefit claimants receiving a Severe Disability Premium, allowing up to 3,000 households in Leicester to remain ineligible for UC, although legislation for this has yet to be introduced.

Universal Credit entitlement is split between standard living allowances and a housing element to cover rents which is paid monthly – typically directly into a claimant’s bank, building society or Post Office account. Household data available to September 2018 indicates that almost 50% of Leicester’s UC claimants receive Housing Costs.

From June 2018, this caseload has increased by between 450 to 550 households per month. This is anticipated to continue until at least July 2019, based on the experiences of other Local Authorities who have already implemented UC FS. Thereafter the increase in caseload will slow until managed migration is introduced, this is anticipated to be delayed until 2020.

Households with three or more children will be exempt from applying for UC until 1 February 2019.

Working-age households in Supported Accommodation will continue to receive Housing Benefit and other heritage benefits for the foreseeable future.

Between 2019 and 2024, long-term legacy benefit claimants will migrate onto Universal Credit – the timetable for this phase has not yet been published.

2. Equality implications/obligations

Which aims of the Public Sector Equality Duty (PSED) are likely be relevant to the proposal? In this question, consider both the current service and the proposed changes.

Is this a relevant consideration?

What issues could arise?

Eliminate unlawful discrimination, harassment and victimisation

How does the proposal/service ensure that there is no barrier or disproportionate impact for anyone with a particular protected characteristic

Universal credit will not affect those people who have already reached State Pension Credit age, and the most vulnerable households in supported accommodation will initially be protected.

The primary barrier to access is the 'online only' application route. Those without access or limited computer skills, literacy, numeracy or English skills, or disabilities may be unable to complete UC claims unaided. The Council will continue to provide under the Universal Support Delivery Partnership access to IT facilities with floorwalker support, training and skills through Libraries and Adult Skills, and form-filling services through our contract with Citizens Advice Leicestershire (CITAL).

The DWP have stated in their own EIA on UC that access for disabled claimants will be guaranteed either by phone or face to face interviews, although no arrangements to facilitate this have been announced in the local area. The local authority

	<p>are able to assist those unable to complete the online form by providing home visits through CITAL.</p>
<p>Advance equality of opportunity between different groups How does the proposal/service ensure that its intended outcomes promote equality of opportunity for users? Identify inequalities faced by those with specific protected characteristic(s).</p>	<p>Universal Credit Full Service will enable remote access and include a dedicated email evidence submission which support workers and agencies can assist with directly.</p> <p>Specialist telephony service provided by the DWP after making their initial claims will help meet equality obligations, particularly for those with literacy, numeracy and disability needs who may struggle with the online format.</p> <p>The Council has been working closely with a range of contracted and voluntary advice and support services to be able to provide assistance to claimants moving onto UC.</p> <p>The DWP state in their own EIA that although some disabled groups may receive less in income, support is targeted towards the most severely disabled and the structure of UC allows for more income through work than under existing disability benefits.</p>
<p>Foster good relations between different groups Does the service contribute to good relations or to broader community cohesion objectives? How does it achieve this aim?</p>	<p>The DWP intention is to make the support provided by UC more transparent and accessible by combining the awards process so the claimant can move in and out of work, experience changes to their circumstances without having to complete multiple forms for difference organisations. The new assessment process may be considered to be fairer and thus</p>

	<p>more equitable across the city’s different communities/protected groups.</p> <p>The aim of a fair and unified benefit assessment system will aid in fostering good relations between different groups challenging potential perceptions of bias or exclusion.</p>
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3. Who is affected?

Outline who could be affected, and how they could be affected by the proposal/service change. Include current service users and those who could benefit from but do not currently access the service.

There are approximately 23,000 Housing Benefit claimant households, (of working age) who are particularly vulnerable as they will become reliant on UC for their housing costs – coping with differing assessment practices, different payment methods and frequency of payment.

There are also approximately other benefit claimants as follows:-

17,000 ESA, 2,460 Job Seekers 4,500 Income Support claimants, 35,800 working /Child Tax Credit recipients.

A large proportion of these claimants will be receiving multiple benefits, and it is not possible to determine a unique number of potentially affected claimants between 2019 – 2024.

4. Information used to inform the equality impact assessment

What **data, research, or trend analysis** have you used? Describe how you have got your information and what it tells you. Are there any gaps or limitations in the information you currently hold, and how you have sought to address this, e.g. proxy data, national trends, etc.

Internal research has been carried out within the Council since 2013, establishing deficiencies within Universal Credit design and pathfinder implementation versus the particular vulnerabilities of Leicester's population and facilities available to enable access and support. Issues identified included likely difficulties with form completion due to poor English, reading, writing and IT skills, particularly in areas of high socio-economic deprivation, financial vulnerability from reduced entitlement due to the cumulative impact of welfare reform income reductions, and the inconsistent availability of quality social welfare advice geographically in the city.

Since April 2017 additional research has been undertaken to identify establish the actual impacts caused by the implementation of UC FS. A number of Local Authorities and key Stakeholder groups operating in full service areas have been contacted to provide information to help us to identify risks and issues which will need to be addressed in our strategic and comms planning

5. Consultation

What **consultation** have you undertaken about the proposal with current service users, potential users and other stakeholders? What did they say about:

- What is important to them regarding the current service?
- How does (or could) the service meet their needs?
- How will they be affected by the proposal? What potential impacts did they identify because of their protected characteristic(s)?
- Did they identify any potential barriers they may face in accessing services/other opportunities that meet their needs?

Service delivery is the responsibility of central government and the DWP - No consultation has been completed locally in respect of Universal Credit. –The Council's responsibilities relating to Universal Credit are covered in our contractual agreement to

provide Universal Support services on behalf of the DWP and our statutory duties, both in benefit delivery of legacy and supplementary support income and our obligations to the city's residents to deliver changes in a proportionate and fair manner.

6. Potential equality Impact

Based on your understanding of the service area, any specific evidence you may have on service users and potential service users, and the findings of any consultation you have undertaken, use the table below to explain which individuals or community groups are likely to be affected by the proposal because of their protected characteristic(s). Describe what the impact is likely to be, how significant that impact is for individual or group well-being, and what mitigating actions can be taken to reduce or remove negative impacts.

Looking at potential impacts from a different perspective, this section also asks you to consider whether any other particular groups, especially vulnerable groups, are likely to be affected by the proposal. List the relevant that may be affected, along with their likely impact, potential risks and mitigating actions that would reduce or remove any negative impacts. These groups do not have to be defined by their protected characteristic(s).

Impact of proposal:	Risk of negative impact:	Mitigating actions:
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Protected characteristics	Describe the likely impact of the proposal on people because of their protected characteristic and how they may be affected. Why is this protected characteristic relevant to the proposal? How does the protected characteristic determine/shape the potential impact of the proposal?	How likely is it that people with this protected characteristic will be negatively affected? How great will that impact be on their well-being? What will determine who will be negatively affected?	For negative impacts, what mitigating actions can be taken to reduce or remove this impact? These should be included in the action plan at the end of this EIA.
Age¹	<p>All working-age claimants over 18 will be affected – those of state pension credit age are protected.</p> <p>Claimants aged under 22 face additional exclusions under UC FS., although a number of exemptions will apply including where the renter is aged at least 18 but under 22 years old and was a care leaver before reaching the age of 18.</p> <p>We have estimated that up to 50 current HB claimants may be unable to access housing costs under UC..</p>	<p>The risk to under 22s in losing entitlement to housing support is high – but limited to single, childless claimants who are fit for work and fail to meet DWP requirements.</p> <p>Reductions in income for large families have already been introduced from January 2017 in respect of new claims for legacy benefits – local support and discretionary award assistance has so far been sufficient to meet demand.</p>	<p>Recommend that intensive support is offered – through our Income Management Team (IMT) and advice services where possible – to inform and assist affected individuals identifiable through HB caseload.</p> <p>Personal Budgeting Support (PBS) is available to rationalise budgets and make steps towards remunerative work, delivered by the Council through our contract with CITAL.</p> <p>Referrals and communications with DWP assist with maintaining</p>

¹ Age: Indicate which age group is most affected, either specify general age group - children, young people working age people or older people or specific age bands

	Entitlement to allowances for children are reduced in comparison to legacy Tax Credit and Housing Benefit claims, although families with three or more children will be initially ineligible for the first three months of UC FS rollout.		Alternative Payment Arrangements to secure tenancies. Discretionary awards such as Discretionary Housing Payments (DHPs) are also available from the council for short term emergency situations, although this is a cash-limited fund which is due to reduce from April 2018 onwards. Care leavers under the age of 25 are due to be offered a 100% exemption from their Council Tax bill from April 2018.
Disability²	Impacts likely as disabled claimants will be expected to complete applications, provide evidence etc. regardless of health or capacity for work. Large number of disabled claimants in Leicester identified from those currently claiming ESA and HB (over 20,000).	Likelihood of impact will depend on the level of disability, support available and the skill level of the individual claimant. For some people with mobility issues or find it more difficult to travel, making claims and submitting evidence online may present an improvement on the existing paper and appointment based processes. The application	The UC claims process does not include non-means tested disability incomes such as DLA and PIP. In many instances, additional support either through the Council's disability assistance services, CITAL or other providers will be required. This will be communicated internally and front-facing services with responsibility for disability assistance will ensure

² Disability: if specific impairments are affected by the proposal, specify which these are. Our standard categories are on our equality monitoring form – physical impairment, sensory impairment, mental health condition, learning disability, long standing illness or health condition.

	<p>High turnover of claimants who will be forced to claim UC in the alternative as reassessment leads to benefit changes.</p> <p>Some disabled claimants will receive a reduced entitlement, particularly those who previously received a severe disability premium.</p> <p>No exceptions apply to the seven waiting day period except for claimants not excepted to live more than six months. No exceptions apply to the minimum six week waiting time or the monthly payment schedule.</p>	<p>process is compliant with screen reader and magnification for claimants with sight issues. Some people with mobility issues may also have difficulties with fine motor skills or cognitive impairments which prevents them from being able to access the online service.</p>	<p>appropriate communication and promotion.</p> <p>If claims are not submitted on time, provisions for backdating claims are limited to one month only with stringent conditions.</p>
Gender Reassignment³	No impacts identified.		
Marriage and Civil Partnership	No impacts identified.		
Pregnancy and Maternity	No change from treatment from existing benefits, maternity pay etc. not included in UC.		

³ Gender reassignment: indicate whether the proposal has potential impact on trans men or trans women, and if so, which group is affected.

Race⁴	<p>Exclusions on the basis of nationality/residence etc. are unchanged from legacy benefits.</p> <p>Issues of command of English/literacy/numeracy relevant particularly for non-UK nationals, who will be expected to claim and manage their application online.</p>	<p>Risk of indirect discrimination – online forms are complex and require a high level of English comprehension, provision of evidence etc.</p>	<p>Signposting services to particular ethnic and cultural groups are available.</p> <p>Language line for internal translations available for one-off queries.</p> <p>DWP will provide interpretation service if requested in advance, although this is subsequent to the application process.</p> <p>The unification of benefits in an already complex system to a single point of access however may increase take up of benefit entitlement previously from at least three separate providers.</p>
Religion or Belief⁵	No impacts identified.		

⁴ Race: given the city's racial diversity it is useful that we collect information on which racial groups are affected by the proposal. Our equalities monitoring form follows ONS general census categories and uses broad categories in the first instance with the opportunity to identify more specific racial groups such as Gypsies/Travellers. Use the most relevant classification for the proposal.

⁵ Religion or Belief: If specific religious or faith groups are affected by the proposal, our equalities monitoring form sets out categories reflective of the city's population. Given the diversity of the city there is always scope to include any group that is not listed.

Sex⁶	<p>Females adversely affected, as the majority of benefit claimants are female.</p> <p>Additionally, 40% of those requiring financial support with housing costs are lone parents, of whom 90% are female. Females have been shown to be disproportionately vulnerable to economic and policy changes.</p>	<p>Primary issue is loss of income – family premium allowances no longer apply, family allowance components and thresholds are reduced and no additional allowances are given for third or subsequent children unless circumstances are exceptional.</p>	<p>UC offers a more flexible assessment and payment system to enable more part-time work and additional free childcare.</p>
Sexual Orientation⁷	No impacts identified.		
<p>Summarise why the protected characteristics you have commented on, are relevant to the proposal? As outlined above, the key protected characteristics with relevance to the proposal are age, race, sex, disability and children in poverty – resulting from potentially unequal access to claim Universal Credit and disproportionately negative impacts from reduced entitlement and an increased need for support.</p> <p>Summarise why the protected characteristics you have not commented on, are not relevant to the proposal?</p> <p>No impacts relating to pregnancy and maternity, sexual orientation, religion and belief or gender reassignment have been identified.</p>			

⁶ Sex: Indicate whether this has potential impact on either males or females

⁷ Sexual Orientation: It is important to remember when considering the potential impact of the proposal on LGBT communities, that they are each separate communities with differing needs. Lesbian, gay, bisexual and transgender people should be considered separately and not as one group. The gender reassignment category above considers the needs of trans men and trans women.

Other groups	Impact of proposal: Describe the likely impact of the proposal on children in poverty or any other people who we consider to be vulnerable. List any vulnerable groups likely to be affected. Will their needs continue to be met? What issues will affect their take up of services/other opportunities that meet their needs/address inequalities they face?	Risk of negative impact: How likely is it that this group of people will be negatively affected? How great will that impact be on their well-being? What will determine who will be negatively affected?	Mitigating actions: For negative impacts, what mitigating actions can be taken to reduce or remove this impact for this vulnerable group of people? These should be included in the action plan at the end of this EIA.
Children in poverty	High Over 30,000 children in Housing Benefit households alone will be affected, potentially experienced financial issues during transition Security of tenure and lowered long-term income is directly affecting life chances and placing people at increased risk of losing their home	Some details quoted nationally state:- “Assuming current official forecasts for wage growth and inflation are correct, there would be 5.1m children living in poverty or 35.7% of the total by 2021-22.” And that:- “Two-thirds of the children now in poverty are from families where someone is working”	Improve engagement with advice agencies – welfare rights provide assistance in SureStart Centres, provision of assistance to THINK family engagement, care/care leavers teams, and other support services. Availability of DHPs and other discretionary awards to support claimants while in financial crisis to access support

Other vulnerable groups	Those with chaotic lifestyles, misuse substances / possible dual diagnosis. Former members of the Armed Forces, and family members of former/current members of the Armed Forces.	May struggle with less frequent payments and without stable accommodation.	Engagement through contracted advice services such as SSAFA – The Armed Forces Charity and frontline in-house substance misuse teams.
Other (describe)			
<p>7. Other sources of potential negative impacts</p> <p>Are there any other potential negative impacts external to the service that could further disadvantage service users over the next three years that should be considered? For example, these could include: other proposed changes to council services that would affect the same group of service users; Government policies or proposed changes to current provision by public agencies (such as new benefit arrangements) that would negatively affect residents; external economic impacts such as an economic downturn.</p> <p>No – by March 2018 all previously announced welfare reform changes will have been introduced.</p> <p>However the future of Supported exempt accommodation (SEA) has not been clarified. A public consultation was held in November 2016 and the Green paper, due out in the spring, has not yet been published.</p> <p>The proposed changes were to be implemented in April 2019 further delays could lead to negative impacts for that sector re uncertainty over funding and difficulties managing a new system at very short notice.</p> <p>A consultation on increasing the minimum payment of Council Tax under the CTS scheme has ended and the Executive have determined the existing scheme will be maintained into 2018/19.</p>			

8. Human Rights Implications

Are there any human rights implications which need to be considered (please see the list at the end of the template), if so please complete the Human Rights Template and list the main implications below:

No impacts identified.

9. Monitoring Impact

You will need to ensure that monitoring systems are established to check for impact on the protected characteristics and human rights after the decision has been implemented. Describe the systems which are set up to:

- monitor impact (positive and negative, intended and unintended) for different groups
- monitor barriers for different groups
- enable open feedback and suggestions from different communities
- ensure that the EIA action plan (below) is delivered

Significant improvements have been made to the monitoring data collated around discretionary awards. This will be improved by the online e-form whereby data is automatically uploaded onto a central database. This will ensure we are able to monitor both positive and negative impacts in greater detail and with a much higher degree of certainty regarding the inferences drawn.

Improvements have also been made in relation to spend monitoring and outstanding claim data, which will be reviewed by Senior Management on a weekly basis.

The support grant scheme has designed to be flexible so that amendments can be made with the weighting of awards following feedback and due regard to budgetary constraints.

The service will continue to monitor performance indicators, protected characteristics and demographic elements as part of an ongoing system of renewal and improvement.

10. EIA action plan

Please list all the equality objectives, actions and targets that result from this Assessment (continue on separate sheets as necessary). These now need to be included in the relevant service plan for mainstreaming and performance management purposes.

Equality Outcome	Action	Officer Responsible	Completion date
Establish and augment monitoring data and corresponding analytical framework	To gather & monitor improved equalities data, adjusting the policy and promotion of the scheme to enable fair and consistent distribution of funds, as necessary and appropriate.	James Hudson	Ongoing
Improved Communication Strategy with advice organisations stakeholders	To continue to develop core interaction with identified stakeholders, e.g. advice organisations and collective action/needs strategy.	Nilkesh Patel	Ongoing
Improved delivery mechanisms from first contact to assessment, all users benefitting from an	Fit for purpose systems developed to meet the needs of all customers, and making	DWP	Ongoing

accessible and easy to understand service	allowances to reflect need and vulnerability as appropriate.		
Long-term sustainability – short- medium- and long-range planning and strategy reviews	To develop, monitor and update strategies and range plans in line with findings – annual reporting and at regular intervals where appropriate.	Caroline Jackson / James Rattenberry	Ongoing

Human Rights Articles:

Part 1: The Convention Rights and Freedoms

- Article 2:** Right to Life
- Article 3:** Right not to be tortured or treated in an inhuman or degrading way
- Article 4:** Right not to be subjected to slavery/forced labour
- Article 5:** Right to liberty and security
- Article 6:** Right to a fair trial
- Article 7:** No punishment without law
- Article 8:** Right to respect for private and family life
- Article 9:** Right to freedom of thought, conscience and religion
- Article 10:** Right to freedom of expression
- Article 11:** Right to freedom of assembly and association
- Article 12:** Right to marry
- Article 14:** Right not to be discriminated against

Part 2: First Protocol

- Article 1:** Protection of property/peaceful enjoyment
- Article 2:** Right to education
- Article 3:** Right to free elections