Predictive: assessing and analysing proposed changes to services, policies and budgets

Enfield Council
Predictive Equality Impact Assessment (EQIA) - Equality Analysis

ADOPTION, SPECIAL GUARDIANSHIP, & RESIDENCE ORDER ALLOWANCES
NOVEMBER 2013
13. Predictive equality impact assessment/equality analysis template

Please complete this cover sheet

<table>
<thead>
<tr>
<th>Proposed change to service/policy/budget</th>
<th>Introduction of a capital cut-off for new applicants for Adoption, Special Guardianship, &amp; Residence Order Allowances from January 2014.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Officer completing the assessment</td>
<td>Apu Alam</td>
</tr>
<tr>
<td>Extension Number</td>
<td>3440</td>
</tr>
<tr>
<td>Service</td>
<td>Strategy, Systems &amp; Performance</td>
</tr>
<tr>
<td>Department</td>
<td>Schools and Children’s Services</td>
</tr>
<tr>
<td>Date impact assessment completed</td>
<td>28 November 2013</td>
</tr>
</tbody>
</table>
Section 1 – About the service, policy or budget, and proposed change

Q1. Please provide a brief description of the service/policy/budget
At present applicants for an Adoption, Special Guardianship, or Residence Order Allowance undergo a financial assessment to determine their eligibility. The present system of means-testing takes no account of cases where applicants may hold substantial capital in the form of savings and/or more than one property to enable them to meet their needs.

Q2. Please provide a brief description of the proposed change(s) to the service/policy/budget
In order for a more accurate assessment of an applicant’s financial circumstances to emerge we aim to introduce from 1 January 2014
i) a more rigorous system of assessment
ii) a capital cut-off set at £35,000 which would disqualify new applicants for these allowances

Q3. Does equalities monitoring of your service show that the beneficiaries in terms of the recipients of the service, policy or budget, and the proposed change, include people from the following groups?

<table>
<thead>
<tr>
<th>Group</th>
<th>Answer</th>
</tr>
</thead>
<tbody>
<tr>
<td>R</td>
<td>Yes (also language spoken to identify whether interpreting facilities are required)</td>
</tr>
<tr>
<td>D</td>
<td>Yes</td>
</tr>
<tr>
<td>G</td>
<td>Yes</td>
</tr>
<tr>
<td>A</td>
<td>Yes</td>
</tr>
<tr>
<td>F</td>
<td>Yes</td>
</tr>
<tr>
<td>S</td>
<td>These factors may be established during the non-financial assessment to be a carer</td>
</tr>
<tr>
<td>T</td>
<td>as above</td>
</tr>
<tr>
<td>M</td>
<td>as above</td>
</tr>
<tr>
<td>P</td>
<td>as above</td>
</tr>
</tbody>
</table>

Q4. If you answered ‘no’ to any of the groups listed in Q3, please state why?
The eligibility criteria regarding allowances and any other financial support are based on the financial procedures and individual financial circumstances irrespective of the above categories.

Q5. How will the proposed change eliminate discrimination, promote equality of opportunity, or promote good relations between groups in the community?
The proposed change in policy does not discriminate against any applicant on the basis of them belonging to one or more of the above groups. Its effect is neutral in this respect.

Section 2 – Consultation and communication

Q6. Please list any recent consultation activity with disadvantaged groups carried out in relation to this proposal
We consulted all existing recipients of these allowances. When they are assessed as carers by the Adoption Team they can volunteer information as to whether they consider themselves to belong to one or more of these groups. However this is not taken into consideration during the assessment of their financial circumstances which this change in policy is concerned with.
Q7. Please state how you have publicised the results of these consultation exercises, and what action you have taken in response

<table>
<thead>
<tr>
<th>R</th>
<th>The consultation was targeted at existing recipients of these allowances and following their response we have decided to introduce the policy change only to new applicants</th>
</tr>
</thead>
<tbody>
<tr>
<td>D</td>
<td>as above</td>
</tr>
<tr>
<td>G</td>
<td>as above</td>
</tr>
<tr>
<td>A</td>
<td>as above</td>
</tr>
<tr>
<td>F</td>
<td>as above</td>
</tr>
<tr>
<td>S</td>
<td>See Q.3 response</td>
</tr>
<tr>
<td>T</td>
<td>as above</td>
</tr>
<tr>
<td>M</td>
<td>as above</td>
</tr>
<tr>
<td>P</td>
<td>as above</td>
</tr>
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</table>

Section 3 – Assessment of impact

Q8. Please describe any other relevant research undertaken to determine any possible impact of the proposed change

From our limited research we were not able to establish whether any other LA has introduced anything similar in respect of these specific allowances. So we were unable to determine the possible impact of the proposed change.

Q9. Please list any other evidence you have that the proposed change may have an adverse impact on different disadvantaged groups in the community

<table>
<thead>
<tr>
<th>R</th>
<th>There is no evidence to suggest that applicants with protected characteristics are any more likely to suffer as a result of this proposal any more than any other group of people, as the decision is based purely on financial circumstances</th>
</tr>
</thead>
<tbody>
<tr>
<td>D</td>
<td>An applicant with a disability may have received a financial settlement based on an estimate of the cost of living their lives as normally as possible. Although their capital may be large at a certain point in time, it is expected to be used to pay for their living costs as income (rather than capital). An annual review of all carers’ financial circumstances should confirm whether capital is being used as income in this type of example.</td>
</tr>
<tr>
<td>G</td>
<td>As in R above</td>
</tr>
<tr>
<td>A</td>
<td>As in R above</td>
</tr>
</tbody>
</table>
Q10. Could the proposal discriminate, directly or indirectly, and if so, is it justifiable under legislation? Please refer to the guidance notes under the heading, 7. Useful Definitions

The proposal only discriminates in terms of the amount of financial capital held by a new applicant. It is an additional element to an existing means-tested system.

Q11. Could the proposal have an adverse impact on relations between different groups? If so, please describe

No

Q12. How could this proposal affect access to your service by different groups in the community?

R  The proposal has no bearing on the access to the service by someone from this group. The proposed cap does not prevent anyone becoming a carer if they want to and are able to do – however, they may not receive financial assistance to do it if their capital is above £35k, and they will know this when they apply in future.

D  as above

G  as above

A  as above

F  as above

S  as above

T  as above

M  as above

P  as above

Q13. How could this proposal affect access to information about your service by different groups in the community?

R  The proposal will not have any effect on access to information about the service by this group in the community.

D  as above

G  as above

A  as above

F  as above

S  as above
Section 4 – Tackling socio-economic inequality

Q14. Will the proposal in any way specifically impact on communities disadvantaged through the following socio-economic factors? Please explain below. If it does not, please state how you intend to remedy this (if applicable to your service), and include it in the action plan.

Communities living in deprived wards/areas

The proposal will not specifically impact on communities disadvantaged through any of the socio-economic factors described below. The proposed cap does not prevent anyone becoming a carer if they want to and are able to do – however, they may not receive financial assistance to do it if their capital is above £35k, and they will know this when they apply in future.

People not in employment, education or training
as above

People with low academic qualifications
as above

People living in social housing
as above

Lone parents
as above

People on low incomes
as above

People in poor health
as above

Any other socio-economic factor
as above

Section 5 – Impact on staff

Q15. How have you consulted, or otherwise engaged with, all relevant staff about this proposal (including any staff on sickness or maternity leave)?

The proposal has no impact on staff

Q16. If your proposal involves a staff restructuring, how have you discussed this with relevant trade unions?
n/a

Q17. Does job matching of existing staff against the new proposed staff structure, following any assimilation process, indicate that any particular groups of staff are adversely affected more than others?

R  n/a
D  n/a
**Section 6 - Miscellaneous**

**Q19.** Is your proposal likely to have an impact on services provided by another Council department or service? If so, have you discussed the possible impact with them?

No

**Q20.** Do you plan to publicise the results of this assessment? Please describe how you plan to do this

This assessment/analysis will be published on the Council's website

**Q21.** How and when will you monitor and review the effects of this proposal?

If monitoring and review is required it can be undertaken by looking at any information volunteered by recipients. As this is voluntary it may not be possible to draw any conclusions. We can ascertain in 2015 whether there has been a decrease in the number of those in receipt of these allowances and if there is whether it can be, in any degree, attributable to this policy change.
14. Action plan template for proposed changes to service, policy or budget

Proposed change to, or new, service, policy or budget: Introduction of a Capital Cut-Off for New Applicants for Adoption, Special Guardianship & residence Order Allowances from January 2014

Team: Looked After Children’s Service  
Department: Schools & Children’s Services

Head of Service: Linda Hughes

<table>
<thead>
<tr>
<th>Issue</th>
<th>Action required</th>
<th>Lead officer</th>
<th>Timescale</th>
<th>Costs</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Introduction of a cap on allowances</td>
<td>Review whether there has been a direct change as a result of this policy</td>
<td>Linda Hughes</td>
<td>January 2015</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Please insert additional rows if needed

APPROVAL BY ASSISTANT DIRECTOR (CHILDREN’S SERVICES) - NAME Tony Theodoulou

SIGNATURE