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SUPPORT

Changes to the Discretionary Support Scheme

Draft Equality Impact Assessment

July 2023

**Section 75 and Schedule 9
The Northern Ireland Act 1998**

**Changes to
the Discretionary
Support Scheme**

Draft Equality Impact Assessment
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An Equality Impact Assessment

Under the statutory duties contained within Section 75 of the Northern Ireland Act 1998, the Department for Communities (the Department) gave an undertaking to carry out an Equality Impact Assessment (EQIA) when appropriate.

This draft report relates to the changes to the Discretionary Support scheme and we would welcome any comments which you may have in terms of this EQIA and our preliminary recommendations with regard to measures to mitigate the adverse impacts.

Further copies of this EQIA report are available on our website at www.communities-ni.gov.uk

If you have any queries about this document, and its availability in alternative formats, then please contact:

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Deadline for comments will be 25 September 2023.

Following consultation the Final Report will be made available.

Section 75 and the Statutory Duties

Section 75 of the Northern Ireland Act 1998 requires each public authority, when carrying out its functions in relation to Northern Ireland, to have due regard to the need to promote equality of opportunity between nine categories of persons, namely

- between persons of different religious belief, political opinion, racial group, age, marital status or sexual orientation
- between males and females generally
- between persons with a disability and persons without
- between persons with dependants and persons without

Without prejudice to its obligations above, the public authority must also have regard to the desirability of promoting good relations between persons of different religious belief, political opinion or racial group.

The Department has in place an Equality Scheme which outlines how the Department proposes to fulfil its statutory duties under Section 75. The legislation requires public authorities to conduct an EQIA where legislation or policy changes are likely to have a significant impact on equality of opportunity. An EQIA is a thorough and systematic analysis of a policy to determine the extent of differential impact upon the relevant groups and in turn whether that impact is adverse.

Due to the significant reduction in funding for the provision of Discretionary Support

grants when compared to expenditure in 2022-23, and the potential impact this may have on people, the Department was of the view that a full EQIA should be conducted on the changes. This document is the draft EQIA for the changes.

When conducting an EQIA, the Department acts in accordance with the guidance published by the Equality Commission in February 2005 which recommends that there should be seven steps in the EQIA process:

Step 1 Defining the aims of the policy.

Step 2 Consideration of available data and research.

Step 3 Assessment of impacts.

Step 4 Consideration of measures which may mitigate any adverse impact and alternative policies which may better achieve the promotion of equality of opportunity.

Step 5 Formal consultation.

Step 6 Decision and publication of the EQIA results.

Step 7 Monitoring for adverse impact.

1: Introduction

The main functions of the Department include:

- the promotion of healthy housing and the provision of decent, affordable, sustainable homes and housing support services
- a social welfare system including focused support to the most disadvantaged areas;
- providing training and support to jobseekers and employers
- bringing divided communities together by creating urban centres which are sustainable, welcoming and accessible to live, work and relax in peace
- supporting local Government to deliver effective public services
- maximising public benefits from the culture, arts and leisure sectors
- tackling disadvantage and promoting equality of opportunity by reducing poverty, promoting and protecting the interests of children, older people, people with disabilities, and other socially excluded groups; addressing inequality and disadvantage

The Department aims to work towards a Common Purpose to support people, build communities and shape places. Through a collaborative response the Department strives

to ensure continued delivery of public services to communities and to fulfil the commitment to help, support and improve lives.

The Department's 2020-2025 Strategy, "Building Inclusive Communities" contains 4 strategic themes – Anti-Poverty, Well-being & Inclusion, Sustainability & Inclusive Growth and Agility & Innovation.

The Department's Budget for 2023-24 is being set in a situation where Executive departments are collectively facing the most challenging budget in recent history, with pressures of over half a billion pounds.

The 2023-24 Budget for Northern Ireland was announced by the Secretary of State on 27 April 2023. The Budget provides the Resource and Capital funding allocations to departments for the 2023-24 financial year.

The Department is facing a very constrained financial position in 2023-24, with £111.2m of a non-ring-fenced funding gap. Given the pressures faced in 2023-24 and the need for decisions to live within the Budget, the Department launched an EQIA on its 2023-24 Budget Settlement on 10 May, with initial responses to inform decisions sought by 7 June 2023.

The Budget 2023-24 EQIA outlined the potential for reduction of Discretionary Support grants and the impact this would undoubtedly have on vulnerable people within Section 75 groups. The initial responses to the Budget EQIA have been considered and the Department has concluded that the implementation of a reduction to the budget for Discretionary Support grants, while undesirable, is necessary. The Department is now carrying out a specific EQIA on changes

to Discretionary Support that will be deliverable under the limited budget. Due to the significant budgetary pressures these measures will be applied from 3 July 2023 with the EQIA running concurrently. Given recent levels of demand, action must be taken now to restrict awards to remain within the current budget and sustain the scheme to the end of the current financial year – particularly during the high demand expected in the winter months.

2. Defining the aims of the Policy

Discretionary Support provides financial support for people who find themselves in an extreme, exceptional or crisis situation, have a total annual income below a set threshold and who meet specific eligibility criteria. Discretionary Support is provided in the form of an interest free loan or a non-repayable grant. Discretionary Support grants are available for living expenses and to allow people to live independently in the community. Prior to the policy changes, a repeat item could be awarded after a 12 month period. Further information can be found online at the Discretionary Support section of NI Direct - <https://www.nidirect.gov.uk/articles/discretionary-support>

The 2022-23 Discretionary Support grants baseline budget was £13.7m. With additional funding allocated to the Department in November 2022, to support the increased level of demand, the final grant spend in 2022-23 was £40.3m.

The Department's financial position following the announcement of the 2023-24 Budget will not allow for this level of spending to continue. On current spend, the 2023-24 Discretionary Support grant baseline budget of £13.7m would be depleted before the end of the 2023-24 financial year. With the Department facing an overall £111.2m (15.5%) Resource

funding gap in 2023-24, a basket of measures has been critically considered to help address the funding gap.

In terms of Discretionary Support grants, the baseline budget has been increased by 46% to £20m in 2023-24.

To protect the Discretionary Support scheme in 2023-24 it is necessary, alongside many other difficult decisions to ensure expenditure remains within budget, to apply limits to the financial assistance that is available through the Discretionary Support scheme.

The process of changing the policy to deliver the necessary limits for Discretionary Support may in some cases have an unintentionally greater impact on some Section 75 groups more than others, for example, on males, females, young people or pensioners, etc. In changing the Discretionary Support policy, the Department has attempted, where possible, to take actions to mitigate against specific adverse impacts on the most vulnerable and consider alternative policies which might better achieve the promotion of equality of opportunity and good relations.

In response to this, the Department examined several potential options for policy

changes to Discretionary Support grants in order to live within the constraints of the limited budget allocation. Given the potential for adverse impacts across Section 75 groups the Department has prepared a draft EQIA and consultation in order to collate views from interested stakeholders. This document is the draft of the EQIA prior to incorporating the outcomes of a public consultation.

Option 1 : Do nothing – if we do nothing given recent levels of demand, the current budget will be fully exhausted by autumn 2023, with no funding available to support grant demand during the autumn and winter months. This option fails to meet the needs of the most vulnerable in our society in the latter months of the year. It would also demonstrate an extreme lack of planning and foresight.

Option 2 : Restrict awards to basic needs and extend repeat item exclusion period –

Restrict grant awards to basic needs only except in ‘setting up’ and disaster situations. Discretionary Support grants are currently paid for a wide range of items from those which are considered absolutely essential basic needs such as cookers and beds, to those which could be deemed important but non-essential in most circumstances such as floor coverings and kitchen items (kettles, toasters etc). Restricting awards to those items deemed absolutely essential would ensure that

the highest priority needs continue to be met. There will however be occasions when a customer is in a ‘setting up’ as opposed to ‘replacement’ situation such as ‘setting up’ home following time in care or custody or fleeing a domestic violence situation. In these cases, and in response to a disaster situation such as a flood or fire, the support available would continue to include those household items deemed to be less essential.

Extend repeat item exclusion period. This will mean extending the exclusion period in which an item can be re-awarded to a period of 24 months except in the event of a disaster or a ‘setting up’ home situation. This approach is supported by online research which shows that electrical appliances last on average in excess of 6 years with items such as beds/ mattresses having a lifespan in excess of 7 years.

In this context the Department has been compelled to consider the prioritisation of the potential available Discretionary Support grant budget to ensure the policy aim that the needs of the most vulnerable people can continue to be met throughout the financial year.

The Department is committed to continuing to provide the same range of grant supports available. This means that grants will still be available for living expenses, household items and payments for those awaiting their first payment of Universal Credit (the Universal Credit Contingency Fund).

The aim is to minimise the impact by applying limits to the number of scenarios or circumstances where assistance is made available rather than removing certain elements of help completely.

However, the Department must prioritise needs and it has been determined that to deliver this policy not all items currently provided for will continue to be available.

In respect of Discretionary Support grants for the replacement of essential household items such as washing machines, cookers and fridges, help to replace broken or malfunctioning items, the Department will be extending the minimum period within which such awards can be made for the same item to 24 months. This is an increase in the current minimum period of 12 months. This means that a claimant will not normally be able to receive a Discretionary Support grant for the same item more than once in any 24 month period.

Again the Department recognises that there will need to be exceptions to this policy and will continue to provide second or subsequent grants for such purposes within the 24 month period for those claimants who are 'setting up' home from a situation such as leaving care, custody or domestic violence or having experienced a disaster situation.

In all of the considerations being taken forward by the Department the policy aims of ensuring that the needs of the most vulnerable people can be met throughout the year has remained the main focus of attention. The full range of services will still be available for those eligible for a Discretionary Support loan (similarly to grants, a loan will now not normally be made for the same item within a period of 24 months).

3: Consideration of Available Data and Research

In order to carry out this EQIA, the following sources of information have been relied upon.

- [a] Analysis by the Department's Professional Services Unit (PSU) around the Section 75 group of those people receiving a Discretionary Support grant in 2021-22 and 2022-23.
- [b] Forecasting on the impact of the 2023-24 Budget on the Department and the potential availability of funding for the Discretionary Support grant budget.
- [c] Initial responses to the Budget 2023-24 EQIA.

4: Assessment of Impacts

The revised policy was examined in the light of information obtained to assess whether or not there was an adverse impact on any of the nine Section 75 groups and to ascertain if action could be taken to promote Equality of Opportunity and / or Good Relations.

Professional Services Unit (PSU), who provide Statistical and Research services to the Department, collated analysis on Discretionary Support grants awarded during the 2022-23 financial year. In this period, 51,148 claimants received a Discretionary Support grant for an item(s). Just over half, 58% (29,646) responded to a Section 75 questionnaire. The following analysis is based on the 29,646 responses.

It should be noted that it is not a mandatory requirement for Discretionary Support claimants to provide Section 75 characteristics about themselves, therefore caution should be exercised when drawing any inferences on the following tables. This is because self-selection bias can occur when participants differ in some way from non-participants which makes the sample unrepresentative of your population of interest.

Almost 14% (4,108) of respondents had also received an award for items during the 2021-22 financial year. There is no

mechanism to ascertain if the item awarded in the 2022-23 financial year was for a duplicate of the item awarded during the 2021-22 financial year. However, as this is the only indicator of repeat items awarded, this figure was used as the baseline to assess the level of impact, of extending the period for repeat items, may have on the service users.

Section 75 Group – Males and Females generally

Almost 67% of those who were awarded a grant and responded to the questionnaire were females. It is anticipated that the changes to the Discretionary Support scheme will have a significantly greater impact on females than males.

Gender	Number	Percentage
Female	19,777	66.99
Male	9,637	32.64
Non-binary	60	0.2
Other	47	0.16

Section 75 Group – Age

The changes to the Discretionary Support scheme will tend to impact those aged below 50 more than those aged 50 and over. The highest percentage for any specific age group of claimants (those aged 30-

39) amounted to 32.86%. It is therefore anticipated that the changes to the

Discretionary Support scheme will have a higher impact for those aged under 50.

Age	Number	Percentage
20-29	6,802	23.89
30-39	9,355	32.86
40-49	5,731	20.13
50-59	4,056	14.25
60-69	1,904	6.69
70-79	510	1.79
80 and over	109	0.38

Section 75 Group – Marital status

Just over two thirds, 68%, of those who were awarded a grant and responded to the questionnaire, declared they were single, never married. It is acknowledged that the changes to the Discretionary Support scheme may therefore significantly impact this Section

75 group more than claimants with a different marital status. Whilst these individuals have declared they do not have a partner, there is no indication if these claimants have dependants who could also be indirectly impacted by the changes to the Discretionary Support scheme.

Marital Status	Number	Percentage
Divorced	2,724	9.47
Living with civil partner	509	1.77
Separated from civil partner	205	0.71
Married living with husband or wife	1,678	5.83
Married but separated from husband or wife	3,119	10.84
Previously in civil partnership but now legally dissolved	54	0.19
Single never married	19,488	67.74
Surviving partner from a civil partnership	44	0.15
Widowed	948	3.3

Section 75 Group – Racial group

Almost all of those who were awarded a grant and responded to the questionnaire (96.3%) declared they were of white origin. This indicates that this Section 75 group is likely to be impacted more than any other ethnic group. However, this percentage concurs as being representative of the general population in Northern Ireland according to Census Data. In addition to having due regard to the equality needs of this group, under Section 75, the Department must also have further regard for this group in the context of good relations.

Ethnic Group	Number	Percentage
African	216	0.81
Irish Traveller	241	0.9
Other	523	1.96
White	25,701	96.33

Section 75 Group – persons with a disability and persons without

Just over half (57%) of those who were awarded a grant and responded to the questionnaire reported they had a physical and / or mental health condition. The changes to the Discretionary Support scheme may impact those with a disability to a greater degree than those without. Other support will continue to be available to those who have a disability, which may ease the impact imposed on this group from the changes to the Discretionary Support scheme. Additional support includes Personal Independence Payment, Disability

Living Allowance (for children), Discretionary Support loans, Social Fund Budgeting Loans or Universal Credit Budgeting Advances where eligibility exists.

Any Physical/ Mental Health Condition	Number	Percentage
No	12,327	42.73
Yes	16,522	57.27

Section 75 Group – Religious belief

Just over half (53%) of those who were awarded a grant and responded to the questionnaire declared their religious belief to be Catholic. The changes to the Discretionary Support scheme may impact more on those with a Catholic religious background. In addition to having due regard to the equality needs of this group, under Section 75, the Department must also have further regard for this group in the context of good relations.

Religion	Number	Percentage
Catholic	15,354	53.1
Christian – not specified	1,317	4.55
No religion	5,110	17.67
Other	499	1.73
Protestant	3,631	12.56
Other Protestant	3,004	10.39

Section 75 Characteristic – Political Opinion

Almost all of those who were awarded a grant and responded to the questionnaire (93%) declared their nationality identity as either Irish (39%), British (29%) or Northern Irish (25%). Whilst it is an almost balanced distribution across these three nationalities the changes to the Discretionary Support scheme may impact those who are Irish nationals slightly more than British and Northern Irish nationals. In addition to having due regard to the equality needs of this group, under Section 75, the Department must also have further regard for this group in the context of good relations.

National Identity	Number	Percentage
British	8,276	28.9
English	631	2.2
Irish	11,292	39.44
Northern Irish	7,052	24.63
Other	1,269	4.43
Scottish	96	0.34
Welsh	18	0.06

Section 75 Group – Sexual Orientation

Almost all (90%) of those who were awarded a grant and responded to the questionnaire declared they were heterosexual. This indicates that the Section 75 group will more likely be impacted than any other group of

another sexual orientation. However, this percentage concurs as being representative of the Northern Ireland population according to Census Data.

Sexual Orientation	Number	Percentage
Bisexual	687	2.43
Gay / lesbian	592	2.1
Heterosexual / straight	25,339	89.76
Other	1,611	5.71

Section 75 Group – Persons with dependants and persons without

Over half (60%) of those who were awarded a grant and responded to the questionnaire recorded they had no responsibility of caring for another person. Of the 40% who had caring responsibilities, 73% of those were caring for children which means that 29% overall had care of children. This figure illustrates the most significant impact of the changes to the Discretionary Support scheme may fall upon those who have no dependants.

Responsibility of care	Number	Percentage
No	17,446	60.04
Yes	11,613	39.96

Initial Responses to the Budget 2023-24 EQIA

Almost 200 initial responses to the Budget 2023-24 EQIA were received by 7 June 2023. Of the responses received, 27 were regarding potential cuts to the Discretionary Support grant budget. The main concern raised was about reducing the budget during the cost of living crisis and the impact that would have on those on the lowest incomes. Some Section 75 groups were highlighted as those most likely to be affected such as women, people with disabilities and those with dependants.

Rural Needs and Child Rights Impact Assessments

The Department conducted a Rural Needs Impact Assessment to establish if those who reside in a rural area will be impacted any differently to those who live in an urban area. The policy change makes no distinction between rural and urban dwellers and changes will be applied equally to any

person who applies for Discretionary Support, regardless of whether they live in a rural or urban area. The social and economic needs of people in rural areas, in relation to this policy, are considered to be the same as those for urban dwellers. It was determined there will be no difference in the impact on people living in rural areas.

A Child Rights Screening was conducted and a full Impact Assessment was not considered necessary. A full Child Rights Impact Assessment would not be proportionate as support is still being provided, though somewhat limited, to meet both essential and non-essential needs, and it is intended for this support to be maintained throughout the financial year. The impact of the proposal will continue to be monitored throughout the year with specific focus on Section 75 groups and the needs of children. The responses to the Department's EQIA on this proposal will also be considered if reviewing this screening decision.

5: Consideration of Measures to Mitigate any Adverse Impact

Having considered the available data, the Department's assessment is that the budget reduction to Discretionary Support grants is likely to impact on some Section 75 groups particularly those who declared their religious belief as Catholic, females, those who are single and who have never married and those with disabilities. The Department has considered that Option 2 above would best meet the policy aim of ensuring the needs of the most vulnerable can continue to be met throughout the financial year in the context of the Discretionary Support budget limits. Option 1, to do nothing, is not feasible, as current demand will result in the Department's Discretionary Support Grant Budget being fully exhausted by autumn 2023 and therefore would not support the policy objectives of Discretionary Support.

Option 2 Restrict awards to basic needs and extend repeat item exclusion period –

Restrict grant awards to basic needs only except in 'setting up' and disaster situations. Discretionary Support grants are currently paid for a wide range of items from those which are considered absolutely essential basic needs such as cookers and beds, to those which could be deemed important but non-essential in most circumstances such as floor coverings and kitchen items (kettles, toasters etc).

Restricting awards to those items deemed absolutely essential would ensure that the highest priority needs continue to be met. There will however be occasions when a customer is in a 'setting up' as opposed to 'replacement' situation such as 'setting up' home following time in care or custody or fleeing domestic violence. In these cases, and in response to a disaster situation such as a flood or fire, the support would include those less essential household items.

Extend repeat item exclusion period. This will mean extending the exclusion period in which an item can be re-awarded to a period of 24 months except in the event of a disaster or a 'setting up' home situation. This is supported by online research which shows that electrical appliances last on average in excess of 6 years with items such as beds/mattresses having a lifespan in excess of 7 years.

The Department acknowledges that Option 2 does not represent an ideal solution, however it has been decided to move forward on this basis as it would meet the highest priority needs whilst reducing spend. The provision of financial support for less essential items may still be made through Discretionary Support loans, Budgeting Loans or Universal Credit Budgeting Advance schemes.

In recognition of the need to continue to support people who are in the most extreme circumstances, the Department will maintain exceptions for those in a disaster situation such as a flood or fire and for those 'setting up' home from a situation such as leaving care, custody or domestic violence. In these cases, the provision of items will remain as they are currently (i.e. there will be no reduction in the support available).

In summary the following range of support and frequency of awards will remain unaffected and will continue to be applied with no change:

- Universal Credit Contingency Fund grants
- living expense grants
- all currently available grants for household items for those in 'setting up' or disaster situations including replacement after 12 months
- all currently available loans for household items for those in 'setting up' or disaster situations including replacement after 12 months

Where the changes to the Discretionary Support scheme are being applied they will:

- continue to provide items essential to a basic standard of living;
- enable the most vulnerable to remain or begin living independently in the community
- ensure support can be provided to all throughout the duration of this financial year

Post-implementation, the Department will monitor the Discretionary Support grants budget and the impact on society as a whole with a specific focus on Section 75 groups needs and desirability for good relations.

The Department would welcome suggestions on measures which would mitigate the adverse impacts and alternatives that might better promote equality of opportunity.

The Department will consider all responses to this EQIA consultation.

6: Formal Consultation

The Department wishes to consult as widely as possible on the findings included in this EQIA together with the preliminary recommendations offered above. With this in mind we propose to take the following actions:

- a press release will be prepared and submitted to various media outlets and a corresponding tweet with a link to the press release on the Department's website
- this report will be issued to all of the consultees listed in our Equality Scheme and to any member of the public on request
- a copy of this report will be posted on the Department's website

- the report will be made available, on request, in alternative formats

The arrangements for consultation are being co-coordinated by Social Security Policy, Legislation and Decision-Making Services, to whom all enquiries should be made. Details of how to make contact can be found on Page 4 of this draft EQIA.

The closing date for responses is 25 September 2023.

7: Publication

The outcomes of this EQIA will be published on the Department's website. In addition, all consultees who participated in the consultation process will be advised of the availability of the final EQIA on the website.

8: Monitoring

Data will be collected on an annual basis about the effect the policy changes are having on the relevant groups and sub-groups within the Section 75 equality categories.

If this monitoring and analysis of results shows a greater adverse impact than

expected, or if opportunities arise which would allow for greater equality of opportunity to be promoted, action will be taken to determine whether better outcomes for the relevant equality groups can be achieved.

9: Confidentiality

The Freedom of Information Act 2000 gives the public the right of access to any information held by a public authority, namely, the Department in this case. This right of access to information includes information provided in response to a consultation. The Department cannot automatically consider as confidential information supplied to it in response to a consultation. However, it does have the responsibility to decide whether any information provided in response to this consultation, including information about identity, should be made public or treated as confidential.

This means that information provided in response to the consultation is unlikely to be treated as confidential, except in very particular circumstances. The Lord Chancellor's Code of Practice on the Freedom of Information Act provides that -

- the Department should only accept information from third parties in confidence if it is necessary to obtain that information in connection with the exercise of any of the Department's functions and it would not otherwise be provided
- the Department should not agree to hold information received from third parties "in confidence" which is not confidential in nature
- acceptance by the Department of confidentiality provisions must be for good reasons, capable of being justified to the Information Commissioner

For further information regarding confidentiality of responses please contact the Information Commissioner's Office at –

Information Commissioner's Office – Northern Ireland

3rd Floor

14 Cromac Place

Belfast

BT7 2JB

Telephone: 028 9027 8757 / 0303 123 1114

Email: ni@ico.org.uk

Website: <http://www.ico.org.uk>

10: Consultation Questions

As set out in this document, the Department is facing a constrained financial position in 2023-24 and this will mean changes to the Discretionary Support scheme.

In consulting on the changes to the Discretionary Support scheme, views are welcomed on the following:

- 1. Are there any data, needs or issues in relation to any of the Section 75 equality categories that have not been identified in Section 3 of the EQIA consultation document? If so, what are they and can you provide details?**
- 2. Are there any adverse impacts in relation to any of the Section 75 equality groups that have not been identified in Section 4 of the EQIA Consultation document? If so, what are they?**
- 3. Please state what action you think could be taken to reduce or eliminate any adverse impacts in the allocation of the Department's Discretionary Support grant budget.**

- 4. Are there any other comments you would like to make in regard to this proforma or the consultation process generally?**

Comments are sought by online survey, email or postal response. The online survey can be accessed here: <https://consultations.nidirect.gov.uk/dfc/2940f53e>

The Department welcomes comment on any aspects of this document. Interested parties are encouraged to make responses by 11 August 2023, which will be used to inform a planned review of the decisions taken on the delivery of Discretionary Support by the Department. Any consultation responses received between 12 August 2023 to 25 September 2023 will be used to inform further decisions around the Discretionary Support grant budget. The final deadline for responses is 25 September 2023.

Available in alternative formats.

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