

Equality & Poverty Impact Assessment 00438 (Version 1)

SECTION ONE: ESSENTIAL INFORMATION

Service & Division:	Corporate & Housing Services Housing & Communities	Lead Officer Name:	Richard McFarlane
		Team:	Housing Operations
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Proposal:	Income Maximisation Strategy for Falkirk.	Reference No:	

What is the Proposal?	Budget & Other Financial Decision	Policy (New or Change)	HR Policy & Practice	Change to Service Delivery / Service Design
	No	No	No	Yes

Who does the Proposal affect?	Service Users	Members of the Public	Employees	Job Applicants
	Yes	Yes	No	No

Other, please specify:

Identify the main aims and projected outcome of this proposal (please add date of each update):

24/02/2023	Develop a Strategy for Income Maximisation across the Falkirk area to ensure households are supported to claim all of the benefits and in kind support they are entitled to.

SECTION TWO: FINANCIAL INFORMATION

For budget changes ONLY please include information below:		Benchmark, e.g. Scottish Average	
Current spend on this service (£'0000s)	Total:		
Reduction to this service budget (£'0000s)	Per Annum:		
Increase to this service budget (£'000s)	Per Annum:		
If this is a change to a charge or concession please complete.	Current Annual Income Total:		
	Expected Annual Income Total:		
If this is a budget decision, when will the saving be achieved?	Start Date:		
	End Date (if any):		

SECTION THREE: EVIDENCE Please include any evidence or relevant information that has influenced the decisions contained in this EPIA. (This could include demographic profiles; audits; research; health needs assessments; national guidance or legislative requirements and how this relates to the protected characteristic groups.)

A - Quantitative Evidence This is evidence which is numerical and should include the number people who use the service and the number of people from the protected characteristic groups who might be affected by changes to the service.

Previous research shows households with certain protected characteristics under Equalities legislation are at greater risk of experiencing poverty than others.

- Women are more likely to be living in poverty than men and find it harder to escape it (see research from [Close the Gap](#)). This is caused by gender pay gap, caring responsibilities, increased financial dependence and reduced access to financial resources.
- Single parent households (which are 91% female) and larger families are more likely to experience poverty (see data at [Towards a Fairer Falkirk](#)).
- Households where there is a disabled person within the household (24,458 households within the area) are more likely to experience poverty due to higher living costs, barriers to employment and the impact of welfare reform measures.
- Minority ethnic groups (2,953 people living in the area from an ethnic minority background). [Research](#) indicates that just under a third (32%) of white people were likely to experience fuel poverty this winter, compared to more than half (51%) of black and minority ethnic people, and rising to two thirds (66%) of Pakistani and Bangladeshi people.
- Older people living on their own (8,602 single pensioner households within the area).

Data from [End Child Poverty](#) indicated that in 2020/2021, 21.3% (more than one in five) children in the Falkirk area were living in poverty. It should be noted that this data was collected during the pandemic, and therefore although it gives a reasonable indication it should be interpreted with some caution.

B - Qualitative Evidence This is data which describes the effect or impact of a change on a group of people, e.g. some information provided as part of performance reporting.

Social - case studies; personal / group feedback / other

No current substantial qualitative evidence about the impact on those with protected characteristics of missing out on benefits and in kind support. A mitigating action in the Strategy is to carry out consultation to enable this information to be gathered (see section 7).

Best Judgement:

Has best judgement been used in place of data/research/evidence?	Yes
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<p>Who provided the best judgement and what was this based on?</p>	<p>Engagement with service providers and those in front line service delivery roles in the production of the Strategic Action Plan. Therefore where best judgement has been used, this is based on extensive experience of working with their customer groups.</p> <p>As noted later in this EPIA, a need for further research and consultation has been identified which is reflected in the Strategic Action Plan.</p>
<p>What gaps in data / information were identified?</p>	<p>There are currently gaps in data held on household awareness and perception of available information about benefits and in kind support, and on take up of in kind support and the true level of financial gain our services achieve for households. In year one of the two year strategic action plan, the aim is to carry out survey work and desk based research to improve existing knowledge and data in these areas.</p>
<p>Is further research necessary?</p>	<p>Yes</p>
<p>If NO, please state why.</p>	<p>N/A</p>

SECTION FOUR: ENGAGEMENT

Engagement with individuals or organisations affected by the policy or proposal must take place

Has the proposal / policy / project been subject to engagement or consultation with service users taking into account their protected characteristics and socio-economic status?	No	
If YES, please state who was engagement with.		
If NO engagement has been conducted, please state why.	Year one of the Strategic Action Plan includes survey and desk based work in the early months to fill gaps in existing knowledge and data. The findings will inform actions later in the plan, and will also lead to the development of new and specific actions in year two. The EPIA will be kept under review and any new mitigations identified through future engagement will be added.	
How was the engagement carried out?	What were the results from the engagement? Please list...	
Focus Group	Yes	Focus groups were carried out with staff in frontline service roles, to gather their views on existing service provision, what is needed in their role to help advise and support customers and what the Strategic Action Plan should include. Their expert knowledge and experience of working with their customer groups is recognised and valued.. The key outcomes from this engagement are detailed in a SWOT analysis in the Strategic Action Plan. Some of the relevant highlights from consultation with staff were: <ul style="list-style-type: none"> - lack of internal knowledge of different support services available to our customers in relation to benefits and in kind support, and the respective roles of different services - information and web content is not always easily understood and accessible for customers - not maximising the potential of the customer data we have available to us to effectively target services and support - not fully capitalising on existing relationships with customers effectively - all staff don't yet have a good understanding of the barriers people face in talking to us about their money.
Survey	No	
Display / Exhibitions	No	

User Panels	No	
Public Event	No	
Other: please specify	N/A	
Has the proposal / policy/ project been reviewed / changed as a result of the engagement?	Yes	
Have the results of the engagement been fed back to the consultees?	No	
Is further engagement recommended?	Yes	

SECTION FIVE: ASSESSING THE IMPACT

Equality Protected Characteristics: What will the impact of implementing this proposal be on people who share characteristics protected by the Equality Act 2010 or are likely to be affected by the proposal / policy / project? This section allows you to consider other impacts, e.g. poverty, health inequalities, community justice, carers etc.

Protected Characteristic	Neutral Impact	Positive Impact	Negative Impact	Please provide evidence of the impact on this protected characteristic.
Age		✓		<p>Pensioners living alone are more likely to experience poverty. Our 2019 – 2024 Towards a Fairer Falkirk Strategy identified 37% of older households in Falkirk as experiencing fuel poverty, and this is likely to have worsened over time given the additional pressure on households created by significant increases in the cost of living.</p> <p>The most recent data we have also shows that more than one in five children in the area were living in poverty in 2020/2021.</p> <p>The Strategy proposals will have a positive effect on this group as they will have an increase in income/benefits.</p>
Disability		✓		<p>Households where someone has a disability are more likely to experience poverty for a number of reasons. It can be harder for those with disabilities to find work, and the stress of living on a lower income can impact negatively on mental health and wellbeing. The cost of living can also be higher for those living with disabilities, such as the costs of heating, specialist diets and travel for appointments etc.</p> <p>The Strategy proposals will have a positive effect on this group as they will have an increase in income/benefits.</p>

Public Sector Equality Duty: Scottish Public Authorities must have 'due regard' to the need to eliminate unlawful discrimination, advance quality of opportunity and foster good relations. Scottish specific duties include:

				<p>dependence and reduced access to financial resources are all factors in this.</p> <p>Research from Close the Gap shows 91% of lone parents are female, with the poverty rate after housing costs standing at 37%. Two thirds of pensioners living in poverty across the UK are women.</p> <p>The Strategy proposals will have a positive effect on this group as they will have an increase in income/benefits.</p>
Ethnicity		✓		<p>Data from our 2019 – 2024 Towards a Fairer Falkirk Strategy shows 2,953 people from minority ethnic backgrounds living in the area.</p> <p>Research by Runnymede Trust indicates that black and minority ethnic people are 2.5 times more likely to be in poverty than white people. Just under a third (32%) of white people were likely to experience fuel poverty this winter, compared to more than half (51%) of black and minority ethnic people, and rising to two thirds (66%) of Pakistani and Bangladeshi people.</p> <p>The Strategy proposals will have a positive effect on this group as they will have an increase in income/benefits.</p>
Religion / Belief / non-Belief				Unknown.
Sexual Orientation				Unknown.
Transgender		✓		<p>25% of transgender people said they have experienced homelessness, and there is evidence that transgender people face economic disadvantage from transphobic prejudice, which can make securing and maintaining employment more difficult.</p> <p>Greater risk of poverty or being made homeless, so the Strategy proposals will have a positive effect as this group will have support to increase their income/benefits.</p>
Pregnancy / Maternity		✓		See above notes under sex.
Marriage / Civil Partnership				Unknown.

Poverty		✓		<p>The purpose of the Strategic Action Plan is to ensure the right support is readily available to anyone who needs it to claim all of the financial and in kind support they are entitled to.</p> <p>This is consistent with our focus on tackling poverty, which is at the heart of the Falkirk Plan, as well as our Towards a Fairer Falkirk (2019 - 2024) strategy.</p> <p>The Fairer Scotland duty has been considered during the development of the Strategic Action Plan, which has a clear focus on maximising the support available to people in or at risk of poverty.</p> <p>Much of this support will benefit children and young people in line with Falkirk's Child Poverty Action Plan, and child poverty priority groups will be prioritised where possible as support is delivered.</p>
Care Experienced				
Other, health, community justice, carers etc.		✓		<p>Carers often face the impact of reduced income due to their caring responsibilities, and rely on benefits such as Carers Allowance to supplement their limited income. As such, they are more likely to experience poverty.</p>
Risk (Identify other risks associated with this change)				

	Evidence of Due Regard
Eliminate Unlawful Discrimination (harassment, victimisation and other prohibited conduct):	N/A.
Advance Equality of Opportunity:	<p>Research and evidence show that those with particular protected characteristics (children, younger people and older people, those with disabilities, single females with children and those from ethnic minority groups) are at greater risk of poverty.</p> <p>Our mitigations to ask people what would help to ensure that those impacted by poverty can access their full entitlement to benefits will help people achieve their full potential</p>

Foster Good Relations (promoting understanding and reducing prejudice):

N/A.

SECTION SIX: PARTNERS / OTHER STAKEHOLDERS

Which sectors are likely to have an interest in or be affected by the proposal / policy / project?		Describe the interest / affect.
Business	No	
Councils	Yes	The proposal will inform how those in frontline services approach households and deliver advice about benefits and in kind support. This includes staff in Housing, Revenues and Benefits, Employment and Training Unit and Community Learning and Development among others.
Education Sector	No	
Fire	No	
NHS	Yes	The proposal will lead to the development of information resources and awareness about benefits and in kind support which will support conversations about these topics between staff and individuals/households.
Integration Joint Board	Yes	The proposal will lead to the development of information resources and awareness about benefits and in kind support which will support conversations about these topics between staff and individuals/households.
Police	No	
Third Sector	Yes	The proposal will inform how third sector organisations and voluntary groups approach households and deliver advice about benefits and in kind support.
Other(s): please list and describe the nature of the relationship / impact.		

SECTION SEVEN: ACTION PLANNING

Mitigating Actions: If you have identified impacts on protected characteristic groups in Section 5 please summarise these in the table below detailing the actions you are taking to mitigate or support this impact. If you are not taking any action to support or mitigate the impact you should complete the No Mitigating Actions section below instead.

Identified Impact	To Who	Action(s)	Lead Officer	Evaluation and Review Date	Strategic Reference to Corporate Plan / Service Plan / Quality Outcomes
Negative Impact	Younger and older people.	<p>Carry out survey work to identify awareness of information resources around benefits and in kind support to identify awareness and needs.</p> <p>Informed by survey, review current information resources and ensure clear and easy to use information available.</p> <p>Use existing data to better effect to target information, advice and support.</p> <p>Improve awareness and knowledge among staff about benefits and support available for children and to older people through training and well organised and clear information resources.</p>	Richard McFarlane	30/03/2024	<p>Falkirk Plan 2021 – 2030 – Poverty outcomes 5 – 8</p> <p>Council Plan 2022 – 2027 - Promoting opportunities and educational attainment and reducing inequalities</p> <p>Towards a Fairer Falkirk – 2019 - 2024</p>

Identified Impact	To Who	Action(s)	Lead Officer	Evaluation and Review Date	Strategic Reference to Corporate Plan / Service Plan / Quality Outcomes
Negative Impact	People with disabilities.	<p>Carry out survey work to identify awareness of information resources around benefits and in kind support to identify awareness and specific needs.</p> <p>Informed by survey, review current information resources and ensure clear and easy to use information available.</p> <p>Use existing data to better effect to target information, advice and support.</p> <p>Improve awareness and knowledge among staff about benefits and support available to those with disabilities through training and well organised and clear information resources.</p>	Richard McFarlane	30/03/2024	<p>Falkirk Plan 2021 – 2030 – Poverty outcomes 5 – 8</p> <p>Council Plan 2022 – 2027 - Promoting opportunities and educational attainment and reducing inequalities</p> <p>Towards a Fairer Falkirk – 2019 - 2024</p>
Negative Impact	Women.	<p>Better use of existing data to target advice and support to maximise income towards those in our priority family groups.</p> <p>For older women, improve awareness and knowledge among staff about benefits and support available to older people through training and well organised and clear information resources.</p>	Richard McFarlane	30/03/2024	<p>Falkirk Plan 2021 – 2030 – Poverty outcomes 5 – 8</p> <p>Council Plan 2022 – 2027 - Promoting opportunities and educational attainment and reducing inequalities</p> <p>Towards a Fairer Falkirk – 2019 - 2024</p>

Identified Impact	To Who	Action(s)	Lead Officer	Evaluation and Review Date	Strategic Reference to Corporate Plan / Service Plan / Quality Outcomes
Negative Impact	Ethnicity.	<p>Carry out survey work to identify awareness of information resources around benefits and in kind support to identify awareness and needs.</p> <p>Informed by survey, review current information resources and ensure clear and easy to use information available.</p> <p>Use existing data to better effect to target information, advice and support.</p>	Richard McFarlane	30/03/2024	<p>Falkirk Plan 2021 – 2030 – Poverty outcomes 5 – 8</p> <p>Council Plan 2022 – 2027 - Promoting opportunities and educational attainment and reducing inequalities</p> <p>Towards a Fairer Falkirk – 2019 - 2024</p>
Negative Impact	Transgender	<p>Planned consultation will be used to identify particular needs of transgender people in relation to income maximisation services.</p> <p>This will inform how we develop information resources, and also how we target and deliver advice and support services in future.</p>	Richard McFarlane	30/03/2024	<p>Falkirk Plan 2021 – 2030 – Poverty outcomes 5 – 8</p> <p>Council Plan 2022 – 2027 - Promoting opportunities and educational attainment and reducing inequalities</p> <p>Towards a Fairer Falkirk – 2019 - 2024</p>

No Mitigating Actions

Please explain why you do not need to take any action to mitigate or support the impact of your proposals.

Are actions being reported to Members?	Yes
If yes when and how ?	Report to Executive in April 2023

SECTION EIGHT: ASSESSMENT OUTCOME

Only one of following statements best matches your assessment of this proposal / policy / project. Please select one and provide your reasons.

No major change required	Yes	The proposal seeks to mitigate the impacts of poverty, consistent with the Council's obligations under the Fairer Scotland duty. Those who experience poverty are often those with protected characteristics, the proposal is only likely to have a positive impact on those groups.
The proposal has to be adjusted to reduce impact on protected characteristic groups	No	
Continue with the proposal but it is not possible to remove all the risk to protected characteristic groups	No	
Stop the proposal as it is potentially in breach of equality legislation	No	

SECTION NINE: LEAD OFFICER SIGN OFF

Lead Officer:

Signature:	<i>Richard McFarlane</i>	Date:	02/03/2023
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SECTION TEN: EPIA TASK GROUP ONLY

OVERALL ASSESSMENT OF EPIA:	Has the EPIA demonstrated the use of data, appropriate engagement, identified mitigating actions as well as ownership and appropriate review of actions to confidently demonstrate compliance with the general and public sector equality duties?	No
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ASSESSMENT FINDINGS	This EPIA acknowledges the current gap in knowledge about why there is low uptake of benefits locally for particular groups - older people, women, people with a disability and transgender people .	
If YES, use this box to highlight evidence in support of the assessment of the EPIA		
If NO, use this box to highlight actions needed to improve the EPIA		

Where adverse impact on diverse communities has been identified and it is intended to continue with the proposal / policy / project, has justification for continuing <u>without making changes been made</u>?	Yes	If YES, please describe: The proposal for year one is to conduct research to find out what the reasons are for low uptake. This should inform the second year of strategy. The outcome of this research and the planned approach to increase income should continue to be monitored and assessed
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LEVEL OF IMPACT: The EPIA Task Group has agreed the following level of impact on the protected characteristic groups highlighted within the EPIA		
LEVEL		COMMENTS
HIGH	Yes / No	
MEDIUM	Yes	it has been identified that a number of groups of people are currently not applying for all the benefits they are entitled to. At present these groups are living in reduced financial circumstances. It is intended to speak to these groups to find out why this is the case. Until a solution is identified to increase uptake, these groups will continue to be disadvantaged.
LOW	Yes / No	

SECTION ELEVEN: CHIEF OFFICER SIGN OFF

Director / Head of Service:		
Signature:	<i>Karen Algie</i>	Date: 16/03/2023