



# Public Document Pack

## Cambridge City Council

### STRATEGY AND RESOURCES SCRUTINY COMMITTEE

**To:** **Scrutiny Committee Members** - Councillors Brown (Chair), Rosenstiel (Vice-Chair), Boyce, Ashton, Benstead, Herbert, O'Reilly and Brierley

**Alternates:** Councillors Blackhurst and Bird

**Leader of the Council:** Councillor Bick

**Executive Councillor for Customer Services and Resources:** Councillor Smith

*Despatched: Thursday, 28 March 2013*

**Date:** Tuesday, 9 April 2013

**Time:** 6.00 pm

**Venue:** Committee Room 1 & 2 - Guildhall

**Contact:** Glenn Burgess **Direct Dial:** 01223 457013

### AGENDA

**10 DISCRETIONARY HOUSING PAYMENT REPORT** *(Pages 1 - 20)*

To follow *(Pages 1 - 20)*

# Information for the Public

**Location** The meeting is in the Guildhall on the Market Square (CB2 3QJ).

Between 9 a.m. and 5 p.m. the building is accessible via Peas Hill, Guildhall Street and the Market Square entrances.

After 5 p.m. access is via the Peas Hill entrance.

All the meeting rooms (Committee Room 1, Committee 2 and the Council Chamber) are on the first floor, and are accessible via lifts or stairs.

**Public Participation** Some meetings may have parts that will be closed to the public, but the reasons for excluding the press and public will be given.

Most meetings have an opportunity for members of the public to ask questions or make statements.

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- For questions and/or statements regarding items on the published agenda, the deadline is the start of the meeting.
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To: Executive Councillor for Customer Services and Resources  
Report by: Alison Cole, Head of Revenues and Benefits  
Relevant scrutiny committee: Strategy and Resources 9 April 2013  
Wards affected: All Wards

## Discretionary Housing Payments

Non Key Decision

### 1. Executive summary

This report presents and recommends the approval of the approach taken within Cambridge City Council's Discretionary Housing Payment (DHP) procedural document. It seeks to raise Members' awareness of the process and to increase understanding of how DHPs can be used in relation to the Welfare Reforms, whilst maintaining discretion by taking each claimant's individual circumstances into account when determining any award, and considers other restraints.

DHPs are only awarded to those entitled to Housing Benefit, and until April 2013, those entitled to Council Tax Benefit. DHPs are available to give extra help towards housing costs where it is considered that additional help is required and should be seen as short-term solutions. It is a discretionary fund, with funding levels and conditions on the scope of its use determined by central government.

DHP funding is determined annually by government and a level of funding is calculated for each Local Authority. This funding can be topped up, but we cannot exceed the overall limit on funding. Any payment of DHP that exceeds the overall cash limit will be deemed to be ultra vires, and the DWP has indicated that the Council would be required to repay the DWP's contribution of £182,340.

There has been a lot of debate about DHPs and this increased attention has focussed the need for an open and transparent procedure, which is why this report is being presented at this time.

## **2. Recommendations**

The Executive Councillor is recommended:

To agree an approach to the award of Discretionary Housing Payments, that maintains discretion, as set out in the Discretionary Housing Payment procedural document, which is appended to this report.

## **3. Background**

### **What can DHPs be used for?**

DHPs are to be used to meet housing costs that are generally defined as rental liability but can also include other costs such as rent in advance or a rental deposit. An award of DHP must be made on individual's particular circumstances, taking into account their income, savings and household make-up.

As a result of announcements during the passage of the Welfare Reform Act 2012, the government's contribution towards DHPs has been significantly increased to help support people affected by some of the key reforms, namely the:

- Introduction of social sector size criteria;
- Introduction of the benefit cap;
- Local Housing Allowance reforms for the privately rented sector.

Each case must be decided on its own merits, and our decision making process should be consistent throughout the year.

### **What is the overall cash limit?**

Local Authorities receive a government contribution for DHPs and the DHP fund is subject to an overall cash limit, which is two and a half times the government contribution of £182,340.

For 2013/14, the government's contribution for Cambridge is £182,340 and the overall cash limit is therefore £455,850.

Our DHP government's contribution for 2010/11 was £25,324 (£32,347 for 2011/12) and whilst this has been increasing slightly year on year, it is increasing significantly for 2013/14.

## **Additional contribution to funding**

To help provide further support for DHP in addition to the government contribution, the Housing Advice Service, via its Homelessness Prevention Grant from the Department for Communities and Local Government, is looking to transfer funds towards the DHP's overall cash limit to help prevent homelessness. From 2012/13 and 2013/14, approximately £95,000 in total has been offered and there will be further funding of approximately £38,000 from a carry forward from 2011/12.

The requests to carry forward these monies are subject to approval in the June 2013 committee cycle. This would give a total spend for DHPs for 2013/14 of approximately £315,340. Any additional funding over £315,340 and up to the total cash limit of £455,850 would have to be separately funded. This has not been budgeted for and as such has financial implications for the Council. This amount of additional top-up funding will only be available for 2013/14.

## **Potential demands on DHP funds**

The amount allocated for each of the categories of Welfare Reforms will not be broken down by the DWP as this would potentially fetter the discretionary nature of the scheme. Additionally, we need to have parity across all sectors of benefit claimants.

To set this in context, during 2012/13, the government contribution was £64,580, which we are likely to marginally exceed by the end of the financial year and which has been used almost exclusively to support Local Housing Allowance claimants living in privately rented accommodation. (Under occupation rules already apply to people living in private sector housing and this sector has also seen changes to the way in which the rates are calculated upon which benefit is based during 2012/13).

Awards of DHP have been made to those who have needed further financial support with their housing costs and in the main were paid to claimants with disabilities, vulnerable children and were paid for short periods of time. Each claim for DHP was subject to a review of each claimant's individual circumstances.

We cannot take a blanket approach, but to demonstrate the pressure this funding will be under, if we had mitigated the impact of the just the LHA welfare reform changes by awarding DHP during 2012/13, we estimate that this would have given rise to DHP expenditure in the region of £1.2m, whereas the total awards actually made will be slightly in excess of £64,580. This provides an illustration as to why we are not permitted to have blanket

policies and also demonstrates that DHP has been targeted to those individuals most in need.

Whilst the DWP encourages having a DHP procedure, it must not be rigid in its use as this would prevent the application of discretion and could potentially open the process up to judicial review.

We could not have an approach that protects everyone affected by the size criteria who wishes to downsize, but is unable to do so due to the availability of alternative accommodation, as this would be a blanket policy and would not take into account an individual's circumstances. Our approach must ensure equal treatment of tenants across both social and private sector housing.

### **Availability of alternative accommodation**

Anecdotal evidence, based on a small sample, suggests that about a quarter to a third of City Homes tenants affected by the size related changes said they would like to downsize. We estimate that it would take approximately two years to re-house all 150 City Homes households who may wish to move, taking into account other priority needs. The latest estimates for City Homes only (they do not include all partners letting properties in Cambridge under Choice Based Lettings) are that over the last two years, City Homes has re-let on average:

- 9 one-bed general flats a month;
- 4 one-bed sheltered flats a month;
- 11 two-bed properties per month.

For Council owned property, there are currently 400 people who are actively bidding for a two bedroomed property and 829 people actively bidding for a one bedroomed property.

### **Available spend versus potential demand**

DHP will be used, as for LHA, to mitigate the impact of extreme hardship, but cannot be used as a blanket payment to compensate for a change in national policy. It is important to note that it is estimated that to mitigate all restrictions due to social sector size criteria for social sector claimants for the financial year 2013/14 would cost in the region of £728,000.

The level of demand for DHP in terms of financial support for the claimants affected by the benefit cap is uncertain, but initial estimates are that approximately £40,000 would be needed to fully mitigate this reform during 2013/14.



Whilst we cannot accurately predict demand, mitigating all of the Welfare Reforms during 2013/14, including £1.2m for LHA private sector claimants, would cost in the region of £2m, which significantly exceeds the overall cash limit of £455,850 and as such is not a viable solution, as it would render the policy incapable of being executed beyond a short period.

Additionally, the DWP have made it clear that the purpose of the DHP fund is to mitigate hardship on an individual claimant's merits and not to compensate for national policy.

#### **4. Implications**

##### **(a) Financial Implications**

Each Local Authority receives a Government contribution and is notified of this by the Department for Work and Pension's Subsidy Circular. For 2013/14 this Government contribution for Cambridge City Council is £182,340. There is a total cash limit on the total amount an authority may spend on Discretionary Housing Payments and this is two and a half times the Government Contribution. For 2013/14, the overall total limit will be £455,850, including the Government contribution.

The Council cannot exceed this amount without contravening the regulations.

##### **(b) Staffing Implications** (if not covered in Consultations Section)

From 1 April 2013, Welfare Reforms will affect a significant number of benefit claimants and requests for DHPs may increase pressure on existing resources, however, Risk Based Verification is being implemented from April 2013 so the reduced staff time in verifying claims will alleviate some of this pressure.

##### **(c) Equal Opportunities Implications**

DHPs are open to anyone receiving Housing Benefit. An Equality Impact Assessment has been carried out in relation to the DHP policy, which includes the details of possible negative impact of some of the reforms and action that will be taken to mitigate these. Requests for DHPs and outcomes will be monitored.

##### **(d) Environmental Implications**

There are no environmental implications from this proposal.

(e) **Procurement**

There are no additional procurement implications from this proposal.

(f) **Consultation and communication**

Requests for DHPs will be monitored to identify trends. Housing Benefit decision letters that are sent to claimants encourage those in need of further financial support to enquire about additional help and details are also on our website.

(g) **Community Safety**

There are no additional implications from this proposal.

## **5. Background papers**

The DHP scheme began on 2<sup>nd</sup> July 2001. The regulations covering DHPs are The Discretionary Financial Assistance Regulations 2001.

These background papers were used in the preparation of this report:

Equality Impact Assessment

## **6. Appendices**

Appendix 1: Discretionary Housing Payment Policy

Appendix 2: Equality Impact Assessment

## **7. Inspection of papers**

To inspect the background papers or if you have a query on the report please contact:

Author's Name: Alison Cole

Author's Phone Number: 01223 457701

Author's Email: [alison.cole@cambridge.gov.uk](mailto:alison.cole@cambridge.gov.uk)

# Discretionary Housing Payment Procedure

Version 2.1 March 2013

This procedural document has been produced to assist officers in the administration of Discretionary Housing Payments (DHP) and must be read in conjunction with legislation and DWP Good Practice Guide.

## INTRODUCTION

In July 2001 the Government introduced the Discretionary Housing Payment (DHP) scheme. It was designed to allow all Local Authorities to pay an assessed discretionary amount to top up the Housing and Council Tax Benefits statutory schemes. The legislation governing DHP can be found in the Discretionary Financial Assistance Regulations 2001 (S1 001 / 1167).

DHP is purely discretionary; a claimant does not have a statutory right to a payment.

Decisions are made in accordance with ordinary principles of good decision making i.e. duty to act fairly, reasonably and consistently, but all claims will be based on their own merits. **Discretion cannot be fettered and there can be no blanket policies.** DWP guidance specifically states we should consider each case on its own merits rather than on a set of predefined criteria and that we should not have a rigid approach, as this would effectively prevent us from exercising our discretion properly in individual cases.

In 2013 there are several changes that will have an impact on the administration of Discretionary Housing Payments. These are as follows:

- Council Tax Benefit will be abolished and replaced with Local Council Tax Support, from 01 April 2013 claimants (including pensioners) will no longer be able to apply for a DHP for Council Tax.
- The introduction of the Benefit Cap.
- The introduction of size criteria in social sector housing.
- Further reductions to Local Housing Allowance (LHA).
- Universal Credit (UC).

The main features of the DHP scheme are that:

- The amount that can be paid out by an Authority in any financial year is cash-limited by the Secretary of State.
- The administration of the scheme is for the Council to determine (with a few specific exceptions).
- DHPs are not a payment of Housing Benefit but there must be an award of Housing Benefit in payment for a DHP to be considered.
- Within the fund there are no ring-fenced amounts, we have to manage all requests for DHPs within the fund amounts.

## APPENDIX 1

### PROCEDURE

The Council will treat each customer equally and fairly. When making a decision all effects of the forthcoming changes will be considered along with financial, medical and household needs of the claimant. The amount of DHP cannot exceed the weekly eligible rent or be awarded beyond the end of the financial year in which it is paid.

Revenues and Benefits work closely with the Housing Advice Service to promote DHP and are committed to working with the local voluntary sector, social landlords and other interested parties in the city to maximise entitlement to all available state benefits. This is reflected in the administration of the DHP scheme. The Council is committed to the equitable operation of a DHP scheme.

### OBJECTIVES

The Council will consider making a payment of a DHP to claimants who meet the qualifying criteria as specified in these procedures. All applications will be looked at on their individual merits, and the operation of these procedures will strive to:

- Alleviate poverty by working with the customers and Housing Options and Advice Team to ensure tenants do not become homeless.
- Encourage and sustain Cambridge City residents in employment.
- Safeguard Cambridge City residents in their homes and to provide support to the vulnerable customers in our community.
- Help those who are trying to help themselves.
- Keep families together.
- Help claimants through personal crises and difficult events.
- Support those affected by the welfare reform changes from April 2013.

Payments of DHP are considered a short-term fund; it is not and should not be considered as a way around any current or future entitlement restrictions set out within the Housing Benefit legislation and forthcoming changes.

### CLAIMING A DHP

A claim for DHP must be made before an award can be given. Sufficient evidence must be received with the claim to enable the Council to make a decision.

The Council will be proactive in contacting claimants who we believe may be entitled to a DHP.

### EXAMPLES OF WHAT WEEKLY DHP CAN BE PAID FOR

#### **Social Sector Size Related Restrictions**

- Property has adaptations to support a person's disability, **such as but not confined to:**
  - Wet room replacing bathroom
  - Worktops lowered
  - Doors widened

The Department of Work & Pensions strongly advise that these awards of DHP are made, but funding is not ring fenced for this within the fund, so the award may not be granted indefinitely.

## APPENDIX 1

- Where disabled claimants use a bedroom to store medical equipment or other items to alleviate their disability such as exercise equipment, wheel chairs, hoists etc.
- Changes in a dependant's age – Where changes in ages mean the restriction would end or reduce from 25% to 14% within 12 months, consideration can be given to awarding a DHP.

### **Local Housing Allowance (LHA)**

Where there is a shortfall between the eligible rent (LHA rate) and the actual rent award, a DHP will be considered, in order to prevent homelessness while the claimant seeks alternative accommodation with guidance from the Housing Advice Service. These are usually given on a three month basis but may be longer or for more than one period.

- Changes in dependants' age – Where changes in ages mean the LHA rate would change in the short term, consideration can be given to award a DHP until the LHA rate changes.
- Under 35 Restriction – Where claimant turns 35 within 12 months and therefore the restriction to use the shared rate ends, consideration can be given to award a DHP.
- Size restrictions can also affect private rented tenants and disabled tenants may require additional space to store disability related equipment.

### **Other Considerations**

- Support for those in fear of violence.
- Non-dependant deductions.
- Two homes when a customer is 'temporarily absent' from their main home, providing they are liable for each address. Note that their entitlement to Housing Benefit may be at another Local Authority.

### **EXAMPLES OF ONE-OFF AWARDS**

A claimant must still have entitlement to Housing Benefit or Universal Credit including housing costs. DHP guidance suggests awards can be made for:

- Rent in advance.
- Rent deposit.
- Other costs associated with housing need such as removal costs.

### **WHAT DHP CANNOT COVER**

DHP cannot cover the following:

- Ineligible services costs.
- Rent increases due to arrears.
- Fraud sanctions and loss of benefits.
- From April 2013, help with Council Tax.
- Costs not relating to housing provision.

## APPENDIX 1

With regard to Social Sector Size Restrictions, where the claimant has an overnight carer, is a foster carer, has children who due to disability cannot share a bedroom at night or live in prescribed supported/exempt accommodation, easement from the regulations is not by awarding DHP but by giving an additional bedroom in the calculation or exempting them from the rules.

### PERIOD OF AWARD

DHP funding is granted to the Council for the length of the financial year and awards cannot be made beyond 31 March.

The length of an award is not fixed; it can be for a short period of time to facilitate an already arranged move or to support someone's stay in an adapted property.

Awards due to LHA restriction are generally 13 weeks but may be longer and may be awarded more than once, depending on the individual circumstances. Where an extension is requested, the claimant must demonstrate that they have actively sought cheaper accommodation, for instance by registering on HomeLink, engaging with the Housing Advice Service, registering with a lettings agency or negotiating with their landlord.

Where there will be changes to restrictions due to imminent birthday changes, a DHP may be considered until those changes happen.

Awards to assist someone to stay in an adapted property or where the additional bedroom is being used for medical equipment or exercise equipment to support recovery or maintain existing health issues can be made until a change in conditions or until the end of the financial year.

A DHP cannot be awarded for any period where there is not an award of Housing Benefit.

### THE AWARD OF DHP

In deciding whether to award a DHP, the Council will take into account:

- The shortfall between Housing Benefit and the rental liability.
- Any steps taken by the claimant to reduce their rental liability.
- The financial and medical circumstances of the claimant, their partner and any dependants and any other occupants of the claimant's home.
- The income and reasonable expenditure of the claimant, their partner and any dependants or other occupants of the claimant's home.
- Savings or capital that might be held by the claimant.
- The level of debt of the claimant and their family.
- The exceptional nature of the claimant and their family's circumstances.
- The possible impact on the Council of not making such an award, e.g. the pressure on priority homeless accommodation.
- Any other special circumstances

The Council will reconsider a DHP award when there are any change in a claimant or household's circumstances.

## APPENDIX 1

### APPEALS

DHPs are not payments of Housing Benefits so are not subject to the statutory appeals mechanism but a review process **must** be in place.

- The claimant or appointee/agent may dispute the decision in writing within a month of the decision being notified.
- The initial request for a 'Revision of Decision' will be passed to the Benefits Manager who will decide the outcome. If the outcome is in the favour of the claimant the DHP will be awarded or amended.
- If the decision is upheld not to award or amend, a letter will be issued to advise the claimant. The claimant will have a further month to ask for a second review.
- The Housing Advice Service Manager, who is independent from the Revenues and Benefits Service, will deal with the second review. If the outcome is in the favour of the claimant, the DHP will be awarded or amended and they will be notified in writing. If is not in their favour, they will be advised in writing with further options of the Council's Complaint's Procedure and in addition to this, information about asking for a Judicial Review.

Naomi Armstrong  
Benefits Manager  
March 2013

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# Cambridge City Council Equality Impact Assessment



Completing an Equality Impact Assessment will help you to think about what impact your strategy, policy, plan, project, contract or major change to your service may have on people that live in, work in or visit Cambridge, as well as on City Council staff.

The template is easy to use. You do not need to have specialist equalities knowledge to complete it. It asks you to make judgements based on evidence and experience. There are guidance notes on the intranet to help you. You can also get advice from David Kidston, Strategy and Partnerships Manager on 01223 457043 or email [david.kidston@cambridge.gov.uk](mailto:david.kidston@cambridge.gov.uk) or from any member of the Joint Equalities Group.

## 1. Title of strategy, policy, plan, project, contract or major change to your service:

Discretionary Housing Benefit

## 2. What is the objective or purpose of your strategy, policy, plan, project, contract or major change to your service?

Discretionary Housing Payments were introduced in July 2001 as a mechanism for Local Authorities to provide further financial assistance with housing costs. The regulations covering Discretionary Housing Payments are The Discretionary Financial Assistance Regulations 2001. Introduction of further Welfare Reforms from April 2013 will increase the number of requests for Discretionary Housing Payments. The number, amount and duration of these awards are difficult to predict and will require careful monitoring during 2013/14.

## 3. Who will be affected by this strategy, policy, plan, project, contract or major change to your service? (Please tick those that apply)

- Residents
- Visitors
- Staff

A specific client group or groups (please state):  
Housing Benefit recipients

## 4. What type of strategy, policy, plan, project, contract or major change to your service is this? (Please tick)

- New
- Revised
- Existing

## 5. Responsible directorate and service

Directorate: Customer and Community Services

Service: Revenues and Benefits

## 6. Are other departments or partners involved in delivering this strategy, policy, plan, project, contract or major change to your service?

No

Yes (please give details):

Customer Service Centre, City Homes, Strategic Housing

## 7. Potential impact

Please list and explain how this strategy, policy, plan, project, contract or major change to your service could **positively** or **negatively** affect individuals from the following equalities groups.

When answering this question, please think about:

- The results of relevant consultation that you or others have completed (for example with residents, people that work in or visit Cambridge, service users, staff or partner organisations).
- Complaints information.
- Performance information.
- Information about people using your service (for example whether people from certain equalities groups use the service more or less than others).
- Inspection results.
- Comparisons with other organisations.
- The implementation of your piece of work (don't just assess what you think the impact will be after you have completed your work, but also think about what steps you might have to take to make sure that the implementation of your work does not negatively impact on people from a particular equality group).
- The relevant premises involved.
- Your communications.
- National research (local information is not always available, particularly for some equalities groups, so use national research to provide evidence for your conclusions).

### (a) Age (any group of people of a particular age, including younger and older people)

Requests for Discretionary Housing Payments can come from claimants of any age, although from April 2013, Welfare Reforms are primarily affecting working age claimants but some of these claimants will have dependant children.

**(b) Disability** (including people with a physical impairment, sensory impairment, learning disability, mental health problem or other condition which has an impact on their daily life)

Welfare Reforms relating to Size Related Restrictions do affect disabled individuals and except where there is an overnight carer where an additional bedroom may be given or due to severe disabilities that prevent siblings sharing a bedroom at night support will have to be given using Discretionary Housing Payments. Disabilities can be both physical or mental.

**(c) Gender**

No effect on gender.

**(d) Pregnancy and maternity**

Women who are pregnant may be affected by Local Housing Allowance and Social Rented Sector size restrictions until their baby is born.

**(e) Transgender** (including gender re-assignment)

No effect on transgender

**(f) Marriage and Civil Partnership**

No effect on marriage and civil partnerships as all couples, whether married, in a Civil Partnership or living together as a couple are treated the same.

**(g) Race or Ethnicity**

No specific effect on race or ethnicity, although some families may have larger numbers of children than others and may be affected by the Benefit Cap.

**(h) Religion or Belief**

No effect on religion or belief.

**(i) Sexual Orientation**

No effect on sexual orientation.

**(j) Other factor that may lead to inequality (please state):**

None

## 8. If you have any additional comments please add them here

None.

## 9. Conclusions and Next Steps

- If you have not identified any negative impacts, please sign off this form.
- If you have identified potential negative actions, you must complete the action plan at the end of this document to set out how you propose to mitigate the impact. If you do not feel that the potential negative impact can be mitigated, you must complete question 8 to explain why that is the case.
- If there is insufficient evidence to say whether or not there is likely to be a negative impact, please complete the action plan setting out what additional information you need to gather to complete the assessment.

All completed Equality Impact Assessments must be emailed to David Kidston, Strategy and Partnerships Manager, who will arrange for it to be published on the City Council's website. Email [david.kidston@cambridge.gov.uk](mailto:david.kidston@cambridge.gov.uk)

## 10. Sign off

Name and job title of assessment lead officer: Naomi Armstrong, Benefit Manager

Names and job titles of other assessment team members and people consulted:

Date of completion: 13 March 2013

Date of next review of the assessment:

## Action Plan

**Equality Impact Assessment title:**

**Date of completion:**

Equality Group	Age
Details of possible disadvantage or negative impact	Elderly or very young claimants or those with children may find it difficult to move if rent is not met by Housing Benefit. Large families may find it difficult to access appropriate affordable accommodation. With the implementation of Benefit Cap, larger families or those living in expensive accommodation may find themselves subject to the cap and have a shortfall in their Housing Benefit.
Action to be taken to address the disadvantage or negative impact	Monitor the requests for Discretionary Housing Payment to include where possible age. Support moving to suitable, sustainable accommodation through liaison with Housing Advice Service with short term or one off Discretionary Housing Payments where appropriate or until restrictions change.
Officer responsible for progressing the action	Naomi Armstrong
Date action to be completed by	30 September 2013

Equality Group	Disability
Details of possible disadvantage or negative impact	Disabled customers may require larger accommodation to store medical equipment or may need to live close to support networks or medical facilities.
Action to be taken to address the disadvantage or negative impact	Monitor the requests for Discretionary Housing Payment to include where possible disability. Where appropriate award additional payments where a property has been substantially adapted. Look at additional support where larger accommodation required. Liaise with Housing Advice Service if a claimant is able to and wants to move.
Officer responsible for progressing the action	Naomi Armstrong
Date action to be completed by	30 September 2013

<b>Equality Group</b>	<b>Gender</b>
Details of possible disadvantage or negative impact	None identified
Action to be taken to address the disadvantage or negative impact	
Officer responsible for progressing the action	
Date action to be completed by	

<b>Equality Group</b>	<b>Pregnancy and Maternity</b>
Details of possible disadvantage or negative impact	Pregnant women may be affected by bedroom calculations before baby is born.
Action to be taken to address the disadvantage or negative impact	Advertise that where claimant is pregnant and restrictions on eligible rent that assistance may be available. Where a request is made and there is maternity income be supportive in a claim for Discretionary Housing Payment. Staff awareness required.
Officer responsible for progressing the action	Naomi Armstrong
Date action to be completed by	30 September 2013

<b>Equality Group</b>	<b>Transgender</b>
Details of possible disadvantage or negative impact	None identified
Action to be taken to address the disadvantage or negative impact	
Officer responsible for progressing the action	
Date action to be completed by	

<b>Equality Group</b>	<b>Marriage and Civil Partnership</b>
Details of possible disadvantage or negative impact	None identified
Action to be taken to address the disadvantage or negative impact	
Officer responsible for progressing the action	
Date action to be completed by	

<b>Equality Group</b>	<b>Race or Ethnicity</b>
Details of possible disadvantage or negative impact	Larger families may become subject to Benefit Cap.
Action to be taken to address the disadvantage or negative impact	Advise people affected of assistance as appropriate. Monitor take up due to Benefit Cap.
Officer responsible for progressing the action	Naomi Armstrong
Date action to be completed by	31 March 2014

<b>Equality Group</b>	<b>Religion or Belief</b>
Details of possible disadvantage or negative impact	Larger families may become subject to Benefit Cap.
Action to be taken to address the disadvantage or negative impact	Advise people affected of assistance as appropriate. Monitor take up due to Benefit Cap.
Officer responsible for progressing the action	Naomi Armstrong
Date action to be completed by	31 March 2014

<b>Equality Group</b>	<b>Sexual Orientation</b>
Details of possible disadvantage or negative impact	None identified
Action to be taken to address the disadvantage or negative impact	
Officer responsible for progressing the action	
Date action to be completed by	

<b>Other factors that may lead to inequality</b>	
Details of possible disadvantage or negative impact	Wider Welfare Reforms may have an impact on claimants ability to fund shortfalls in rent.
Action to be taken to address the disadvantage or negative impact	Advise claimants who are in difficulty that additional funding may be available, support moves to sustainable accommodations. Offer budgeting advice through Third Sector organisations. Monitor take up of Discretionary Housing Payments and the reasons for awards.
Officer responsible for progressing the action	Naomi Armstrong
Date action to be completed by	31 March 2014