

# Equality Impact Report (Appendix 1)

|                               |  |
|-------------------------------|--|
| <b>Title of proposal</b>      | <b>Minimum Income Guarantee (MIG) for Working Age Adults</b>                     |
| <b>Date of implementation</b> | <b>8 April 2019</b>  |
| <b>EIR completed by:</b>      | <b>Name:</b> Deborah Robinson, Adults Service.<br><b>Tel:</b> Tel: 0330 22 28413 |

## 1. Decide whether this report is needed and, if so, describe how you have assessed the impact of the proposal.

An equality impact report is needed due to the potential financial and emotional impact of the proposal on people who use our services and on their families and carers and because it has the potential to have a disproportionate impact on people with protected characteristics – in particular people with a learning and/or physical disability or mental health issues. It is also required because of the need to ensure any other potential impact is understood and taken into account in terms of how these proposals fit in the wider context.

The wider context is the recent and on-going review of the whole benefits system, particularly as it impacts those who are disabled. This has highlighted the differing views (of Government and also research and academic bodies) about what constitutes a minimum income.

Additionally there are organisations which identify the living costs for those who are disabled to be higher than those who are not disabled. While the financial assessment service disregards disability related expenditure (DRE) as part of the financial assessment, this brings into focus how the DRE is determined.

## 2. Describe any negative impact for customers or residents.

The Council recognises that some people may experience a level of anxiety during the consultation and decision-making period, with some being more susceptible than others, for example, people with learning disabilities and those with mental health issues. The Council, therefore, took care to engage with a broad range of stakeholders to clearly explain the proposals and respond to questions during the consultation period which included opportunities for face-to-face discussion within focus groups and various meetings. (See appendix 3 which has details of the consultation).

The impact caused by a potential increase in the amount people have to pay towards their care, could affect their participation in work, education, training or recreation, social and economic wellbeing.

The mitigations to possible adverse impact include:

- To ensure that the information and advice regarding budgeting and managing money is widely available and easily accessible.
- Information to be made available to all in the wider health and social care system who provide advice and support to people affected. This would include voluntary and community sector organisations and also local social prescribing teams as this would assist GPs in advising patients with associated stress and anxiety.
- The financial assessment services to ensure the Welfare Benefit Advisers are available to ensure all benefits are maximised.
- The financial assessment service to clarify how Disability Related Expenses (DRE) are allowed, what information is required to support the expenses claimed in advance, as

this has an impact on the financial assessment and how much a customer has to contribute to their care.

- WSCC to work with local communities to increased access to online information, advice and resources
- WSCC to approach local businesses in relation to their social responsibility ethos to strengthen/increase opportunities for people of working age with disabilities to move into employment

### **3. Describe any positive effects which may offset any negative impact.**

The Council recognises that the impact of the proposal may increase the amount of money people contribute towards the cost of their care and, therefore, they and their families and other stakeholders, may not feel that there are positive effects of the change.

It is hoped that the mitigating actions listed in section 2 above can, as far as possible, offset some adverse impacts.

### **4. Describe whether and how the proposal helps to eliminate discrimination, harassment and victimisation.**

Careful consideration is being given to equalities legislation during the consultation to ensure that people with protected characteristics and those who may be disproportionately affected by the proposal were identified and invited to share their views. Their views have been taken into account in the development of the final recommendations.

### **5. Describe whether and how the proposal helps to advance equality of opportunity between people who share a protected characteristic and those who do not.**

The proposal will align the MIG between those of working age and those over 65 years old. Currently those of working age have the statutory amount plus an additional allowance at the discretion of WSCC, while those over 65 years of age receive the statutory amount.

While it is recognised the annual MIG allowances are higher to those over the age of 65 years, than those of working age, the MIG is one element of the financial assessment regulations.

Adults' Services operations involve working with people on a day-to-day basis to ensure equality of access to services between people who share protected characteristics and others. Staff routinely take account of people's diverse needs when delivering support to ensure services are as equitable as possible and any barriers identified and removed.

### **6. Describe whether and how the proposal helps to foster good relations between persons who share a protected characteristic and those who do not.**

The proposal may be perceived as neutral regarding the fostering of good relationships between this group of customers and the wider public although for this group of people their social life and opportunities could be considered by them, to be reduced when compared with the wider public. Attention will need to be given to identify any such impact.

Feedback from a wide range of stakeholders, many of whom share protected characteristics and some who do not, has been used to inform the recommendation.

Consultation participation rates from people in Black Asian and Minority Ethnic communities have historically not been as high as the Council would wish. This is a continuing theme which Adults' Services works hard to address. Channels are in place to facilitate continuing, and indeed, increased, engagement with under-represented groups, for example via the county-wide Minorities Health and Social Care Group which has representation from a wide range of community groups and through the network of local community groups.

**7. What changes were made to the proposal as a result? If none, explain why.**

The proposal to reduce the MIG for working age adults to the statutory amount as provided by central government has not been changed. This is because the Council needs to make decisions as how it can meet the range of needs and statutory responsibilities within the available Adults care budget while endeavouring to minimise the impact across all of the different groups who use the Adults care services.

What has been considered are the potential mitigations (question 2 above) to manage any impact.

**8. Explain how the impact will be monitored to make sure it continues to meet the equality duty owed to customers and say who will be responsible for this.**

The impact of the proposed change will be evaluated via our financial monitoring processes and through existing engagement channels with people who use our services and other stakeholders, including Healthwatch West Sussex.

If the proposal is agreed and a Cabinet Member decision taken, an action and communication plan will be created. This plan will be monitored by Deborah Robinson (Adults' Services).

**To be signed by a Director or Head of Service to confirm that they have read and approved the content.**

Name

Dave Sargeant

Date

6 Dec. 2018

Your position

Interim Director Of Adults Services