APPENDIX C

FAIRER WESTMINSTER

City of Westminster

EQUALITY IMPACT ASSESSMENT

Completing an EQIA is the simplest way to demonstrate that the Council has considered the equality impacts of its decisions and it reduces the risk of legal challenge. EQIAs should be carried out at the earliest stages of policy development or a service review, and then updated as the policy or review develops. EQIAs must be undertaken when it is possible for the findings to inform the final decision.

SECTION 1:

Title	Cost of Living Projects 2022/ 2023
What are you analysing? • What is the policy/project/activity/strategy looking to achieve? • Who is it intended to benefit? Are any specific groups targeted by this decision? • What results are intended?	This EIA analyses the council's proposed £1m investment in projects to help residents during the cost of living crisis. They aim to • Target the range of households at risk based on data and community intelligence • Balance direct support with advice etc. • Be deliverable i.e. completed or started by March 2023 in order to provide help when it is most needed. In summary the projects are:

Theme	Rationale	£	%	Households assisted
Income / Debt Advice and outreach Funding to boost capacity in advice organisations (Paddington Law Centre, Citizens Advice, Cardinal Hume, AgeUk and global majority / BAME organisations) and to promote widely the range of support available.	• To help meet increasing demand • To spread support across established organisations with good reach, plus to meet the needs of global majority / BAME communities / older people • To improve knowledge of support amongst those most at risk	£360k	36%	All low income / those in debt / global majority / BAME

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	Theme	Rationale	£	%	Households assisted
	Direct Support Funding includes an energy voucher scheme for struggling households on prepayment meters, topping up existing welfare / crisis budgets which can help people in a crisis and supporting new food charities	• Direct support helps to address income shortfall due to inflation • c. 10,000 residents have prepayment meters and intelligence indicates rising demand for help Rising demand for crisis support i.e. food support etc.	£505k	50%	All low income / Single people for per meters
	Winter in the City Funding for promotional material and potentially small grants to participating organisations	Residents aware of and have access to free and warm spaces if they cannot heat their homes	£55k	6%	All households struggling to keep warm
	Contingency To be used flexibility to include addressing any new / emerging circumstances	To respond to urgent / changing circumstances	£82k	8%	
	Total		**£1m**		
Details of the lead person completing the screening/EQIA	Cecily Herdman: Principal Policy Officer cherdman@westminster.gov.uk				
Date sent to equalities@westminster.gov.uk					
Version number and date of update	1				
You will need to update your EQIA as you move through the decision-making process. Record the version number here and the date you updated the EQIA. Keep all versions so you have evidence that you have considered equality throughout the process. However only the most updated version will be saved in the Equalities SharePoint folder. 1					

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SECTION 2: Do you need to complete a full Equality Impact Assessment (EQIA)?
Not all proposals will require a full EQIA, the assessment of impacts should be proportionate to the nature of the project/policy in question and its likely impact. To decide on the level of detail of the assessment required consider the potential impact on persons with protected characteristics.

2.1	**Please provide an overview of who uses/will use your service or facility and identify who are likely to be impacted by the proposal** • *If you do not formally collect data about a particular group then use the results of local surveys or consultations, census data, national trends or anecdotal evidence (indicate where this is the case). Please attempt to complete all boxes.* • *Consider whether there is a need to consult stakeholders and the public, including members of protected groups, in order to gather information on potential impacts of the proposal*

	How many people use the service currently? What is this as a % of Westminster's population?	Around 31,000 households (now increased to 32,000) are identified in the council's Cost of Living Strategy as being at risk during the cost-of-living crisis which is nearly one quarter of households within Westminster. We do not have a full breakdown of these households so benefits and other intelligence has been used below to help identify their profile.
	Gender	As the benefit data below shows men are more likely to be receipt of benefits compared with their share of the Westminster population. It should also be noted that unemployment claimant rates have been slower to fall amongst men since March 2021 and particularly amongst men over 50. However other data suggests women may have lower incomes as they are more likely to be homeless. A review of homelessness in Westminster[1] found women were the lead applicant for 78% of temporary accommodation households.

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[1] www.westminster.gov.uk/sites/default/files/westminster_city_council_review_of_homelessness_2019.pdf

	Men	Women
Census 2021	53%	47%
Benefit recipients: Claimant Count*	57%	43%

* NOMIS, Claimant count not seasonally adjusted (September 2022)

Race	The table below shows that the unemployment rate is higher amongst global majority / BAME households compared with the overall population. To Note: NOMIS data does not breakdown BAME groups fully.

	All	BAME
Westminster Unemployment rate - aged 16+	5.7%	13.3%
Westminster Employment rate - aged 16-64	66.9%	49.3%
% Who are economically inactive in Westminster- aged 16-64	28.9%	43%

Source: NOMIS, Annual population survey, Jul 2021-Jun 2022

Other data suggests certain ethnic groups are more likely to have lower incomes, for example a review of homelessness in Westminster found households from a Black, Arab, Other or Asian background were more likely to be affected by homelessness (and in temporary accommodation)[2] compared with their share of the Westminster population.

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[2] www.westminster.gov.uk/sites/default/files/westminster_city_council_review_of_homelessness_2019.pdf

		Twenty per cent of users of North Paddington Foodbank are migrants or asylum seekers with no resource to public funds and 22% are lone parents from a global majority / BAME background. Community intelligence from the Westminster Community Alliance and Food and Energy Network has also highlighted that certain communities / groups, such as some global majority / BAME groups and older people, are less aware of the current support available and less likely to access advice through traditional organisations.	
	Disability	The table below suggests that a high proportion of benefit recipients have physical disabilities. *Low-Income Family Tracker (LIFT), July 2022* Other data such as intelligence from North Paddington Food Bank shows that 51% of their users have a household members with a disability.	
	Sexual orientation	Within Westminster a survey estimates 62.8% identified as heterosexual, 3.3% identified as gay or lesbian, 0.9% identified as bisexual and 7.5% are not known or refused to answer. There is no reason to believe that residents in receipt of benefits vary from this profile.	
	Age	Benefit recipients generally are more likely to be older compared with the Westminster population overall.	

	Health: described as bad or very bad
While city wide data is not directly comparable with the category below, 5% of people aged 18-64 are estimated to have impaired mobility and 4% have a moderate or serious personal care disability[3]	
Benefit recipients claiming Housing Benefit or Council Tax Support claiming a disability benefit (ESA, or DLA)*	48%

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[3] All estimates are based on the Projecting Adult Needs and Service Information (PANSI) and Projecting Older People Population Information (POPPI) datasets, which are compiled by the Institute of Public Care
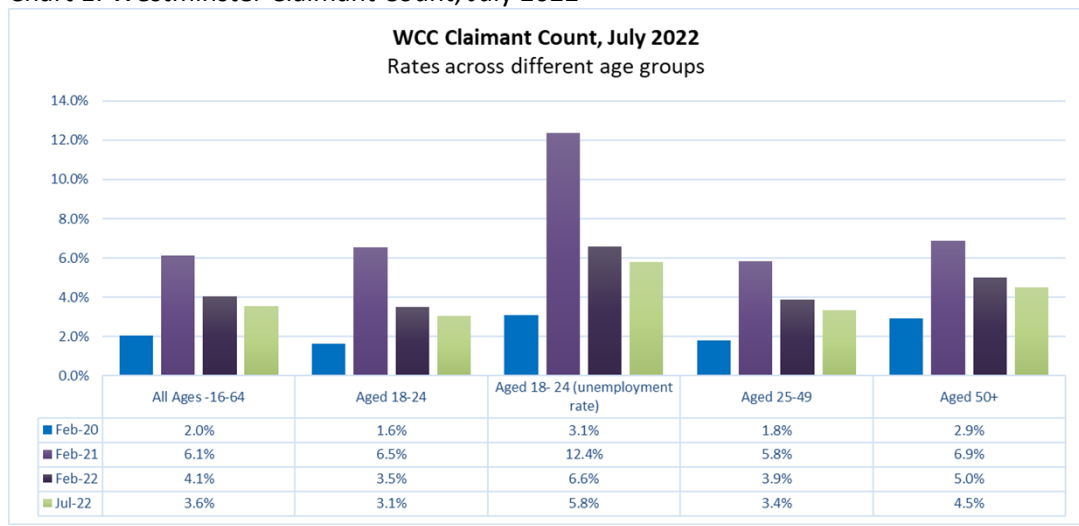
	18 - 24	25-44	45-64	65+
ONS Mid-year Population estimates 2020	9.3%	36.5%	22.9%	12.6%
Benefit recipients: Council Tax Support or Housing Benefit (18-64)*	2%	23%	41%	34%

*Low-Income Family Tracker (LIFT), July 2022

However, examining claimant count data (the number of people claiming unemployment related benefits) suggests that claimant rates are higher amongst young people than the general working age population and have been slower to fall post pandemic (see chart 1)

Chart 1: Westminster Claimant Count, July 2022

WCC Claimant Count, July 2022
Rates across different age groups

	All Ages -16-64	Aged 18-24	Aged 18- 24 (unemployment rate)	Aged 25-49	Aged 50+
Feb-20	2.0%	1.6%	3.1%	1.8%	2.9%
Feb-21	6.1%	6.5%	12.4%	5.8%	6.9%
Feb-22	4.1%	3.5%	6.6%	3.9%	5.0%
Jul-22	3.6%	3.1%	5.8%	3.4%	4.5%

Claimant Counts, WCC Analysis, April 2022 – Data from DWP Claimant Count

	Religion or belief	The religion and belief of benefit recipients is not known

	Christian	Jewish	Buddhist	Muslim	Hindu	Sikh
Westminster population	45%	3%	1%	18%	2%	0.2%
Benefit recipients	Information not available					

Household composition

	With Children
Mid-Year Population estimates 2020	33%
Council Tax Support or Housing Benefit (18-64)*	26% (Of which 17% are lone parents)

*Low-Income Family Tracker (LIFT), July 2022

Although there are a lower proportion of households with children amongst households receiving locally administered benefits, other data suggests they are more likely to be affected by homelessness. A review of homelessness in Westminster found 86% of lead applicants in temporary accommodation and 44% of homeless applicants had children.[4]

Also rising rates of households eligible for free school meals (29% between Spring 2020 and Spring 2022) indicates a growing proportion of families affected by the crisis and 62% of North Paddington Foodbank users have children under 12.

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[4] westminster.gov.uk/sites/default/files/westminster_city_council_review_of_homelessness_2019.pdf

2.2 Are there any groups with protected characteristic that are overrepresented in the monitoring information relative to their size of the population? *If so, this could indicate that the proposal may have a disproportionate impact on this group even if it is a universal service.*	Using households in receipt of benefits as an indicator of those most likely to need help from the fund, the following groups are over-represented compared to their size in the overall population: • People in the 45 – 64 and 65 plus age groups • Ethnic minority households • Men • People with disabilities • Households without children However the cost of living crisis is having a significant impact on all groups and other data suggests that the following groups are also likely to be in need: • Younger people • Women • Households with children
2.3 Are there any groups with protected characteristics that are underrepresented in the monitoring information relative to their size of the population? *If so, this could indicate that the service may not be accessible to all groups or there*	See above

may be some form of direct or indirect discrimination occurring.	

2.4	**Does the project, policy or proposal have the potential to disproportionately impact on people with a protected characteristic? If so, is the impact positive or negative?**

	None	Positive	Negative	Not sure
Men or women		☒	☐	☐
People of a particular race or ethnicity (including refugees, asylum seekers, migrants and gypsies and travellers)		☒	☐	☐
Disabled[5] people (consider different types of physical, learning or mental disabilities)		☒	☐	☐
People of particular sexual orientation/s		☒	☐	☐
People in particular age groups (consider in particular children, under 21s and over 65s)		☒	☐	☐
People who are intending to undergo, are undergoing or have undergone a process or part of a process of gender reassignment		☒	☐	☐

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[5] Disability discrimination is different from other types of discrimination since it includes the duty to make reasonable adjustments.

Impact due to pregnancy/ maternity		☒	☐	☐
People of faiths and beliefs		☒	☐	☐
People on low incomes		☒	☐	☐

If any of the answers to the questions above is, "negative" or "unclear" you will need to undertake a detailed impact assessment.

2.5	**Based on your responses, should a full, detailed EQIA be carried out on the project, policy or proposal?**
	No as it is anticipated that the proposed projects will help to meet the needs of the range of households at risk and will have a positive impact. For example, the advice organisations such as Paddington Law Centre, Citizens Advice and Cardinal Hume are well established in the community and will provide help to a range of low incomes households across the community. This is complemented by support to organisations working with certain communities and older people where data and community intelligence points to a need and as they are less likely to use more mainstream organisations. Some of the funding will also be used to train front line workers about the range of support and help available and to communicate it. The direct support will also provide help to a wide range of risk groups and in different ways to get as broad a reach as possible.
2.6	**Provide brief reasons on how you have come to this decision?**
	See above

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SECTION 3: ASSESSING THE IMPACT

In order to be able to identify ways to mitigate any potential impact it is essential that we know what those potential impacts might be. Using the evidence gathered in section 2, explain what the potential impact of your proposal might be on the groups you have identified. You may wish to further supplement the evidence you have gathered using the table below in order to properly consider the impact.

Protected Group		Positive impact?			Negative impact? If so, please specify the nature and extent of that impact	No specific impact	If the impact is negative, how can it be mitigated? Please specify any mitigation measures and how and when they will be implemented	What, if any, are the cumulative effects of this decision when viewed in the context of other Council decisions and their equality impacts
		Eliminate discrimination	Advance equality	Good relations				
Gender	Men							
	Women							
Race	White							
	Mixed/Multiple ethnic groups							
	Asian/Asian British							
	Black/African/Caribbean/ Black British							
	Gypsies / travellers							
	Other ethnic group							
Disability	Physical							
	Sensory							
	Learning Difficulties							
	Learning Disabilities							
	Mental Health							

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Protected Group		Positive impact?			Negative impact?	No specific impact	What will the impact be? If the impact is negative, how can it be mitigated? (action)	What are the cumulative of effects
		Eliminate discrimination	Advance equality	Good relations				
Sexual Orientation	Lesbian, gay men, bisexual							
Age	Older people (50+)							
	Younger people (16 - 25)							
Gender Reassignment								
Impact due to pregnancy/maternity								
Groups with particular faiths and beliefs								
People on low incomes								

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SECTION 4: ACTION PLAN

4.1	Complete the action plan if you need to reduce or remove the negative impacts you have identified, take steps to foster good relations or fill data gaps. *Please include the action required by your team/unit, groups affected, the intended outcome of your action, resources needed, a lead person responsible for undertaking the action (inc. their department and contact details), the completion date for the action, and the relevant RAG rating: R(ed) – action not initiated, A(mber) – action initiated and in progress, G(reen) – action complete.* **NB. Add any additional rows, if required.**

	Action Required	Equality Groups Targeted	Intended outcome	Resources Needed	Name of Lead, Unit & Contact Details	Completion Date (DD/MM/YY)	RAG
	Enter additional rows if required						

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SIGNATURE:

FULL NAME: Ezra Wallace

UNIT: Innovation and Change

EMAIL & TELEPHONE EXT: ewallace@westminster.gov.uk

DATE (DD/MM/YYYY): 29 November 2022

WHAT NEXT?

It is the responsibility of the service to complete an EQIA to the required standard and the quality and completeness of EQIAs will be monitored by EMT.

All EQIAs for proposed changes to levels of service arising from budget proposals must be completed by (insert date).

All completed EQIAs should be sent to equalities@westminster.gov.uk