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# Appendix 1

Stage 1- Initial Analysis Form

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## Equality Analysis - Stage One – Initial analysis of the end of The Haven Wolverhampton’s £175,000 per year voluntary sector grant

**What you are analysing? The Haven Wolverhampton’s voluntary sector grant of £175,000 per year time expires on 31 March 2016. The grant funds one Benefits and Immigration Officer post and a proportion of each of the salaries of the core staff members within The Haven Wolverhampton.**

Is it a; service  function  policy  procedure

Is it? A new service, function, policy or procedure

An existing service, function, policy or procedure

An amended or revised service/ function/ policy/ or procedure

<p>1. What are the main aims and objectives or purpose of the service, function, policy or procedure (proposal)? What needs or duties is it designed to meet?</p>	<p>The grant funds one Benefits and Immigration Officer post; the post holder provides information, advice and assistance on benefits and immigration related matters to women and children using The Haven Wolverhampton’s housing support and social inclusion accommodation based services. The remaining grant amount funds a proportion of each of the salaries of the core staff members within The Haven Wolverhampton.</p>
<p>2. Who is or will be affected by this proposal?</p>	<p>The Haven Wolverhampton staff including The Benefits and Immigration Officer, service users, alternative service providers.</p>

<p>3. Is the proposal affected by external drivers for change? (e.g. new or amended legislation, national policy, external inspections etc.)</p>	<p>The grant contract time expires on 31 March 2016.</p>
<p>4. Who is responsible for defining and implementing this proposal?</p>	<p>Strategic Improvement and Development Officer – Housing Support and Domestic Violence, Children’s Commissioning, Children and Young People, People, Wolverhampton City Council.</p>
<p>5. How does Wolverhampton City Council interact with other bodies or organisations in relation to the implementation of the proposal?</p>	<p>The Haven Wolverhampton holds a contract with the council for the grant, which specifies the council’s requirements. The Council has well developed working relationships with The Haven Wolverhampton and alternative service providers such as the Refugee and Migrant Centre and Citizens Advice Bureau, both of which hold contract(s) with the Council for funding.</p>
<p>6. What analyses, information or data relating to the proposal already exist?</p>	<p>A contract is in place between The Haven Wolverhampton and the council, which specifies the council’s requirements. The Haven Wolverhampton submits quarterly performance data.</p>

7. Is there any evidence of higher or lower take up under the proposal for any particular groups? (from formal monitoring or informal anecdotal evidence)	No.
8. Is there any evidence that the proposal may be directly or indirectly discriminatory?	No.
9. If the proposal is discriminatory, can it be justified?	Not applicable.
10. If the proposal is not discriminatory, is there any evidence that it has a differential impact?	As the Benefits and Immigration Officer supports women with immigration-related issues, including women with no recourse to public funds who are trying to secure immigration status, the end of the service will have a differential impact on race. Seven women were supported to secure immigration status in the year to 1 October 2014.
11. If there is a differential impact, is it likely to have an adverse impact on any group?	As the Benefits and Immigration Officer supports women with immigration-related issues including women with no recourse to public funds who are trying to secure immigration status, the end of the service will have an adverse impact on black and minority ethnic groups. Seven women were supported to secure immigration status in the year to 1 October 2014.

<p>12. If there is an adverse impact, can that impact be justified?</p>	<p>Alternative, specialist services are available in Wolverhampton. As the number of women who require specialist support to secure immigration status is low (seven during the year to 1 October 2014), the capacity of alternative services is sufficient. The adverse impact identified is therefore entirely mitigated by the provision elsewhere of equally specialist services to this group of women.</p>
<p>13. What evidence have you used to make your judgment of discrimination and/or adverse impact?</p>	<p>The grant contract and performance reports.</p>
<p>14. If the discrimination/adverse impact cannot be justified, how do you intend to deal with it? Is there any alternative measure which would achieve the desired aim without the adverse impact identified?</p>	<p>Not applicable.</p>
<p>15. Does or could, the proposal contribute to a specific duty in equality law?</p> <ul style="list-style-type: none"> <li>• eliminate discrimination, harassment and victimisation</li> <li>• advance equality of opportunity between people from different groups</li> <li>• foster good relations between people from different groups.</li> </ul>	<p>No.</p>
<p>16. Are there any groups which might be expected to benefit from the intended outcomes but do not?</p>	<p>No.</p>
<p>17. Is the proposal intended to increase equality of opportunity by permitting or requiring action to redress disadvantages? If yes, is it lawful?</p>	<p>No.</p>
<p>18. Have you consulted as part of your analysis? Who have you consulted? What</p>	<p>A meeting to discuss the end of the grant contract</p>

methods did you use?	has been held with The Haven Wolverhampton.
19. Is there any public concern (in the media etc.) that the proposal is being operated in a discriminatory manner?	Not currently although this is a likely risk to the council.
20. Have there been any important demographic changes or trends locally? If so, are these anticipated or dealt with by the proposal?	Wolverhampton is a multi-cultural city, which in recent history has attracted large numbers of refugees and migrants, leading to changes in its demographic make-up. The Benefits and Immigration Officer provides information, advice and assistance on benefits and immigration related matters to women and children, including those who are trying to secure immigration status, who are using The Haven Wolverhampton's housing support and social inclusion accommodation based services. Alternative services are available that can support these women when the grant contract ends.
21. How is information about the proposal publicised?	The Haven Wolverhampton offers the service to all users of its housing support and social inclusion services. It is not available to non-service users.
22. How will you monitor in future?	Quarterly performance information will be

	submitted up until 31 March 2016 when the contract ends. The requirement to submit performance information ends when the grant contract ends.
23. Is there any other relevant information?	The Haven Wolverhampton plans to secure replacement funding. However, if it fails to do this, the delivery of their housing support and social inclusion service contract will be at risk. Please see the answers to the questions below for further detail.

## Is there a need for a full Equality Analysis?

Work through the following questions, recording evidence as appropriate. (These questions are the same as on the framework and flowchart (appendices 2 and 3), use whichever one you prefer.

1. Are there any concerns or evidence that the proposal affects or could affect people differently or that the needs of certain groups would not be met? (Consider all the equality strands – age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation;

### **Yes / No / Don't Know**

- If the answer is **No**, then there is **no need to carry out any further analysis**, record the basis for your answer and send this form to be signed off.
- If the answer is **Yes**, record your concerns and any evidence and **move on to question 2**.
- If the answer is **Don't Know**, record what evidence is needed to help you make a decision and **move on to question 2**

The Benefits and Immigration Officer provides immediate and on-going support within The Haven Wolverhampton's accommodation based services to women and children who are resident. The post holder coordinates the application processes for housing benefits and welfare

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benefits and provides up to date information, guidance and advice on housing benefit and welfare benefit related issues. The post holder also supports women with no recourse to public funds to secure immigration status. For this reason, the end of the service will impact more on black and minority ethnic groups. In the year to 1 October 2014, seven women were supported to secure immigration status.

In the event of replacement funding not being secured to cover the salary costs of core staff members, the financial viability of The Haven Wolverhampton would be at risk and so therefore would their ability to deliver the emergency accommodation and floating support service contract it holds with the council. This may give rise to an adverse impact on the 50 women and their dependents at any one time accessing emergency accommodation services and 85 people and their dependents at any one time accessing floating support services.

2. If the proposal affects or could affect people differently, does this mean that some groups of people would experience a less favourable service than others or that the needs of some groups would not be met?

**Yes / No / Don't Know**

- If the answer is **No**, then there is **no need to carry out any further analysis**, record the basis for your answer and send this form to be signed off.
- If the answer is **Yes**, record what the worse service involves and any evidence and **move on to question 3**.
- If the answer is **Don't Know**, record what evidence is needed to help you make a decision and **move on to question 3**

Alternative, specialist services are available in Wolverhampton. The Refugee and Migrant Centre specialises in supporting Black and minority ethnic groups and is able to support people with no recourse to public funds to secure immigration status. In recognition of the specific needs of women from Black and minority ethnic groups, the Refugee and Migrant Centre holds a women only drop-in session every Tuesday. As the number of women requiring support to secure immigration status is small (around seven per year), there will be little impact on the capacity of the Refugee and Migrant Centre.

Citizens Advice Bureau and the council's Welfare Rights and Housing Benefits teams are able to provide information advice and guidance to people requiring support with welfare benefit and housing benefit related issues. In the year to 1 October 2014, 204 women were provided with direct support from the Benefits and Immigration Officer.



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There is sufficient capacity within the alternative services available to meet this demand.

If The Haven Wolverhampton fails to deliver the housing support and social inclusion services contract it holds with the council due to the inability to identify replacement funding for core staff costs, the needs of 50 women and their dependents and at any one time accessing their emergency accommodation provision and 85 people and their dependents at any one time accessing their floating support provision would not be met unless mitigation was available. Mitigating actions taken/available include:

- The two contracts are held by The Haven Wolverhampton, one for its voluntary sector grant and one for the provision of housing support and social inclusion services, were awarded independently by different service areas within the council. They are not co-terminus.
  - Discussions with The Haven Wolverhampton began in April 2015 regarding the end of their voluntary sector grant contract and its plans to ensure its continued financial viability post contract end. The council will continue to work closely with The Haven Wolverhampton, providing support as required.
  - The Haven Wolverhampton has increased the capacity of its Grants team in recognition of its need to secure alternative funding and reduce reliance on public sector funding.
  - The council will continue to provide support to The Haven Wolverhampton to identify and apply for alternative funding.
  - In the absence of replacement funding being secured on time, The Haven Wolverhampton plans to re-structure to reduce core costs.
  - In their 2013/14 Annual Review, The Haven Wolverhampton declared total funds of £1,540,703 of which £1,269,282 are unrestricted and £271,421 are restricted.
3. Can this less favourable service be justified on the grounds of advancing equality of opportunity?
- Yes / No / Don't Know**
- If the answer is **No**, record the basis for your analysis and **move on to question 4**.
  - If the answer is **Yes**, the basis for your analysis should also be recorded, now **move on to question 4**.
  - If the answer is **Don't Know**, record what evidence is needed to help you make a decision and **move on to question 4**.

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The expiry of the grant contract on 31 March 2016 will not confer an advanced equality of opportunity.

4. Can the proposal be amended so that no one experiences a worse service and the overall aims and objectives are still fulfilled?

**Yes / No / Don't Know**

- If the answer is **No**, unless the proposal can be justified on the grounds of advancing equality of opportunity, the proposal should be referred back
- If the answer is **Yes**, what amendments are required? When the necessary amendments have been identified, **move back to question 1**, to assess the likely impact of the amended proposal.
- If the answer is **Don't Know**, record what evidence is needed to help you make a decision and **move on to question 5**.

The grant contract will time expire on 31 March 2016. Alternative services are available in Wolverhampton for people with support needs related to benefits and immigration.

It should be noted that if the council decides it wishes to continue to award the £175,000 per year voluntary sector grant, an open tender process would need to be followed. Therefore the only way that The Haven Wolverhampton could continue to be the grant contract holder post 31 March 2016 would be if a) the council decides it can afford to continue to award the grant (rather than contribute it towards People Directorate's 2016/17 savings target in line with the council's Medium Term Financial Strategy)) and b) The Haven Wolverhampton submits a tender application and is successfully awarded the grant contract.

Please see the list of mitigating actions in the answer to question 1 above.

5. Should there now be a full analysis of the proposal? Consider the responses to all the previous questions to decide whether to carry out a more detailed review. If necessary, take advice from colleagues and other stakeholders before reaching a decision.

**Yes / No / Don't Know**

- If the answer is **No**, set a review date, agree what monitoring will be required and send this form to be signed off.
- If the answer is **Yes**, move onto the full analysis form.

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- If the answer is **Don't Know**, detail what information you need to make a judgement and outline how you will obtain this information with timescales

Review date: 31 April 2016 to enable time for the 2015/16 quarter 4 performance information regarding the Benefits and Immigration Service to be produced and analysed. The required equality monitoring information will be included in this performance information.

The ability of The Haven Wolverhampton to continue to deliver its housing support and social inclusion services contract will be reviewed on an on-going basis and formally in July 2015 at a meeting with The Haven Wolverhampton. If at any point a decision is made to re-provide all or part of the services, a full equality analysis will be carried out to ensure consideration of the impact of the changes on service users has been made.

**Officer(s) completing the analysis: Jessica Timmins**

**Job Title: Strategic Improvement and Development Officer**

**Tel: 01902 558267**

**Date: 1 June 2015**

**Upon completion of this form please record the date sent to:**

Authorising Officer: Carole Bourne

Date 1<sup>st</sup> sent: 2 June 2015

Date re-sent: 18 June 2015

Equality and Policy Officer: Stuart Malpass

Date 1<sup>st</sup> sent: 2 June 2015

Date met: 16 June 2015

Date re-sent: 18 June 2015

Date re-sent: 29 June 2015

Group Manager Corporate Administration:

Martyn Sargeant

Date met: 16 June 2015

Equality Project Group: (if appropriate)

Date sent: