

EQUALITY IMPACT ASSESSMENT AND ANALYSIS (EqIAA)

SOUTH GLOUCESTERSHIRE WELFARE GRANTS SCHEME

SECTION 1 - INTRODUCTION

In October 2010 the government published the White Paper 'Universal Credit: welfare that works', detailing the government's proposals for wide-ranging welfare reform. This has been included in the Welfare Reform Act and the reform of the Discretionary Social Fund currently administered by the Department for Work and Pensions (DWP). It is proposed that this will be replaced with a discretionary scheme administered by South Gloucestershire Council from April 2013.

To help local communities identify and meet the needs of people who are most vulnerable, the government believes the service should be delivered locally. Through localising the service it should be possible to improve the quality of decision making and integrate with locally designed programmes that can provide complementary assistance to people who most need support.

The elements of the Discretionary Social Fund that will be replaced with local provision are:

- Community Care Grants
- Crisis Loans.

Crisis Loans are intended to meet immediate needs such as general living expenses or items needed following a disaster and entitlement is not dependent upon receipt of a benefit.

Community Care Grants (CCG's) are non-repayable grants to enable vulnerable customers to live in the community and are conditional upon receipt of an income related benefit.

South Gloucestershire Council is preparing to launch a new service called the South Gloucestershire Welfare Grant Scheme. This will replace the Social Fund Community Care Grants and Crisis Loans currently administered by the Department of Work and Pensions. This new service will start on 1st April 2013.

A provisional budget for South Gloucestershire of £344,000 was announced by the government which will be less than the DWP has spent in previous years. The budget is fixed, therefore, the service must make the most of the money available to help as many people as possible, throughout the year.

The scheme will be reviewed throughout the first year to ensure we are using all local information from applications to refine the scheme on an on-going basis.

The scheme will consider paying awards under two types of need:

1. to people who require immediate support, and
2. to people who require assistance to establish or maintain a home in the community.

The scheme will seek to provide a range of support, taking into account alternative local provision including Discretionary Housing Payments, Disability Related Expenditure allowances within social care charging policy, Council Tax Support and Disabled Facilities Grant

SECTION 2 – CONSULTATION AND RESEARCH

The Council issued a public consultation with regard to the proposed *South Gloucestershire Welfare Grant Scheme*.

The consultation pack included an Initial Equality Impact Assessment and Analysis document (shown in appendix 1) which set out the council's initial assessment of likely equalities impacts in relation to the proposed scheme. This afforded consultees the opportunity to consider the council's thinking for how the proposed scheme would impact on people from a full diversity of equalities communities relating to all nine protected characteristics as set out in The Equality Act, and respond with comment and feedback.

The Initial Equality Impact Assessment and Analysis document additionally set out research information as requested by the council from the Department of Work and Pensions (DWP) relating to South Gloucestershire for the year 2011/12 which shows the following:-

In respect of both Crisis Loans and Community Care Grants, most applicants had no children aged 16 or younger however, where there were children under 16 years, the youngest child was most likely to be 0 – 5 years:-

2011/2012 (Full Year)	Crisis Loan Items	Crisis Loan Living Expenses	Crisis Loan Alignments	Community Care Grants
Age of youngest child				
0-5	20%	22%	10%	33%
6-8	3%	3%	2%	7%
9-12	1%	3%	2%	4%
13-16	3%	2%	2%	4%
No children 16 or under	72%	71%	84%	52%

In respect of both Crisis Loans and Community Care Grants, the majority of applicants were aged 18 – 24 years. However, ages 25 – 34 and 35 – 44 featured significantly:-

2011/2012 (Full Year)	Crisis Loan Items	Crisis Loan Living Expenses	Crisis Loan Alignments	Community Care Grants
Age of recipient				
Under 18	0%	1%	3%	1%
18 to 24	36%	37%	44%	25%
25 to 34	33%	31%	27%	29%
35 to 44	20%	19%	15%	21%
45 to 54	10%	10%	9%	14%
55 to 64	1%	3%	1%	8%
65 to 69	0%	0%	0%	2%
70 to 79	0%	0%	0%	2%
80 to 89	0%	0%	0%	0%
90 and over	0%	0%	0%	0%
Unknown	0%	0%	0%	0%

In respect of both Crisis Loans and Community Care Grants, households of a single male or single female featured most significantly:-

2011/2012 (Full Year)	Crisis Loan Items	Crisis Loan Living Expenses	Crisis Loan Alignments	Community Care Grants
Household Type				
Couple	9%	12%	6%	15%
Single Female	44%	39%	29%	54%
Single Male	47%	50%	65%	30%

Note:- Awards & applications rounded to nearest 10

The public consultation was open from mid November 2012 to 8 February 2013. The survey was made available in paper and online forms and was available in a full variety of formats upon request in-line with the council's Equality and Diversity Communications Policy which itself has undergone robust consultation and development since its launch in early 2011. A copy of the consultation survey is shown in appendix 2.

The consultation was promoted through posters at all four One Stop Shops, Libraries, Post Offices, Community Centres and Doctors Surgeries. Equality monitoring questions were asked as an integral part of the consultation survey covering respondent's Gender, Age, Ethnic Origin and any Disability in order that results could be disaggregated and analysed in respect of each question raised.

The consultation was sent directly to Welfare Advice Partners, South Gloucestershire Compact members and a full set of Equalities groups and organisations.

The consultation results received are as follows:-

South Gloucestershire Welfare Grants Scheme - Equalities analysis of survey responses

Question	Overall	Member of the public	Responding as an organisation	Received DWP grant or loan in the past	Not received DWP grant or loan in the past	Male	Female	Aged under 44	Aged 45 to 55	Aged over 55	In paid work	Not in paid work	Disabled	Non disabled	White British	Non White British	
																	Base
Q1 Eligibility criteria applicant type % agreeing or strongly agreeing with policy																	
Applicant is on a low income and without access to sufficient funds to meet their immediate needs	78%	78%	86%	100%	75%	73%	79%	71%	85%	86%	77%	80%	100%	75%	79%	67%	
Applicant requires support to stay in the community	71%	69%	86%	100%	67%	80%	68%	65%	69%	92%	66%	90%	83%	72%	73%	50%	
Applicant has demonstrated that they are without immediate resource to meet the basic needs of themselves and/or their dependents	92%	89%	100%	100%	91%	87%	97%	100%	85%	93%	90%	100%	100%	94%	95%	67%	
Applicant is leaving care and requires support	90%	86%	100%	100%	89%	93%	93%	88%	100%	93%	93%	90%	83%	94%	93%	67%	
Q3 Eligibility criteria circumstances for support % agreeing or strongly agreeing with policy																	
Have no essential food	94%	92%	100%	100%	93%	93%	93%	100%	92%	93%	90%	100%	100%	94%	95%	83%	
Have no heating	90%	89%	93%	100%	91%	87%	90%	94%	85%	93%	83%	100%	100%	89%	90%	83%	
Require emergency travel costs	46%	41%	57%	67%	43%	47%	43%	35%	54%	54%	45%	60%	50%	42%	41%	67%	
Require essential clothing	72%	64%	93%	67%	70%	67%	72%	76%	69%	64%	70%	80%	67%	72%	71%	67%	
Need help after a disaster	76%	69%	93%	67%	77%	86%	69%	71%	75%	79%	69%	100%	80%	75%	76%	67%	
Need essential household goods e.g. bedding	71%	63%	93%	67%	70%	67%	71%	71%	69%	77%	62%	90%	100%	67%	71%	67%	
Q5 Eligibility criteria circumstances not supported % agreeing or strongly agreeing with policy																	
Who have an income or savings which they could use to meet their needs	71%	72%	62%	33%	74%	79%	69%	76%	69%	62%	77%	44%	50%	74%	71%	67%	
To buy (or repair) TV or satellite	68%	69%	57%	33%	73%	73%	62%	65%	69%	57%	73%	40%	33%	69%	64%	83%	
To pay housing costs or rent arrears	53%	60%	36%	67%	56%	73%	43%	53%	54%	46%	52%	50%	33%	53%	51%	67%	
To meet motor vehicle expenses	51%	54%	43%	0%	58%	60%	46%	53%	46%	46%	55%	30%	17%	56%	49%	67%	
Q7 Emergency Application decision																	
Within 24 hours	67%	66%	71%	100%	65%	60%	75%	69%	69%	71%	70%	70%	80%	72%	73%	33%	
1 to 2 days	29%	29%	29%	0%	30%	27%	25%	31%	15%	29%	23%	30%	20%	25%	24%	50%	
3 to 7 days	4%	6%	0%	0%	5%	13%	0%	0%	15%	0%	7%	0%	0%	3%	2%	17%	
Q8 Emergency application payment																	
Within 24 hours	54%	50%	71%	100%	48%	47%	55%	47%	62%	57%	53%	50%	67%	53%	55%	50%	
1 to 2 days	40%	42%	29%	0%	45%	40%	41%	53%	23%	36%	37%	50%	33%	42%	40%	33%	
3 to 7 days	6%	8%	0%	0%	7%	13%	3%	0%	15%	7%	10%	0%	0%	6%	5%	17%	
Q9 Non emergency applications decision																	
Within 3 days	26%	22%	43%	67%	25%	33%	17%	12%	23%	43%	20%	40%	50%	25%	24%	50%	
4 to 7 days	50%	50%	43%	0%	55%	40%	59%	71%	31%	43%	47%	50%	17%	56%	52%	33%	
8 to 14 days	24%	28%	14%	33%	20%	27%	24%	18%	46%	14%	33%	10%	33%	19%	24%	17%	
Q10 Non emergency applications payment																	
Within 3 days	20%	19%	29%	33%	20%	27%	10%	12%	23%	21%	17%	20%	50%	17%	19%	33%	
4 to 7 days	48%	39%	64%	33%	48%	40%	55%	59%	31%	57%	43%	70%	17%	56%	50%	33%	
8 to 14 days	32%	42%	7%	33%	32%	33%	34%	29%	46%	21%	40%	10%	33%	28%	31%	33%	
Q11 Review Initial stage 1 decision																	
Within 3 days	38%	42%	36%	67%	36%	47%	28%	24%	46%	43%	37%	30%	50%	33%	33%	50%	
4 to 7 days	30%	28%	36%	0%	32%	13%	41%	47%	8%	36%	27%	40%	33%	33%	33%	17%	
8 to 14 days	32%	31%	29%	33%	32%	40%	31%	29%	46%	21%	37%	30%	17%	33%	33%	33%	

Q12 Review further stage 2 decision																	
Within 3 days	26%	28%	29%	100%	23%	20%	28%	18%	23%	43%	23%	30%	67%	19%	24%	50%	
4 to 7 days	34%	33%	29%	0%	36%	20%	38%	41%	23%	29%	30%	30%	17%	36%	33%	17%	
8 to 14 days	40%	39%	43%	0%	41%	60%	34%	41%	54%	29%	47%	40%	17%	44%	43%	33%	
Q13 Repeat Applications																	
Yes	76%	74%	79%	33%	79%	71%	76%	82%	58%	71%	69%	80%	17%	83%	74%	80%	
No	12%	11%	21%	67%	7%	14%	10%	0%	25%	21%	17%	10%	50%	6%	12%	20%	
Q15 Repeat application - loan																	
Yes	67%	69%	71%	100%	67%	57%	76%	71%	50%	86%	69%	80%	83%	69%	69%	80%	
No	27%	26%	29%	0%	26%	36%	17%	24%	42%	7%	24%	10%	0%	25%	24%	20%	
Q17 Maximum limits % agreeing to limit																	
Particular items e.g. a cooker	96%	97%	93%	67%	100%	100%	93%	100%	92%	93%	97%	90%	83%	100%	95%	100%	
Specific living expenses	84%	81%	93%	67%	86%	93%	76%	82%	92%	71%	90%	70%	33%	92%	81%	100%	
Q18 Flexible payment method % agreeing with policy																	
	72%	67%	86%	100%	70%	87%	66%	82%	69%	71%	70%	90%	100%	72%	71%	67%	

Key: **Green** more than 5% above average **Red** more than 5% below average

Questions 2, 4, 6, 16, 19 and 20 of the consultation asked people to state written comments and a total of 121 comments were received plus three comprehensive letters originating from the following organisations: *1625 Independent People*, *South Gloucestershire Citizen's Advice Bureau* and *Merlin Housing Society*. All of these comments are shown in Appendix 3 of this EqIAA document.

The following table sets out an analysis of the consultation results as relating to equalities issues, along with responses to each issue emerging. The consultation results, which have been disaggregated according to equalities groups (above), allow trends to be identified and these are also included in the table below.

Analysis and Consultation Feedback	Response
<p>Disabled People were more likely to want to see financial assistance and/or support for customers who have an income or savings which they could use to meet their needs; to buy (or repair) TV or satellite, to pay housing costs or rent arrears, to meet motor vehicle expenses.</p>	<p>These are important issues which the SG Welfare Grants Scheme has taken into consideration and which will be proactively monitored on an ongoing basis.</p> <p>It is important to recognise that for many disabled people, having access to many items such as a motor vehicle makes an extremely significant impact to quality of life and wellbeing due to no other viable alternatives/options being available or accessible. For example, a car may potentially be more of a luxury item for many Non-Disabled People, whereas a car may be the sole means of being mobile and therefore being able to do shopping, attend crucial appointments etc. for some Disabled People. This means that the rapid addressing of applications and making of payments, as well as the ability to consider individual needs and circumstances will be a critical element of the SG Welfare Grants Scheme's success; and as the consultation results indicate – particularly for many Disabled People. The SG Welfare Grants Scheme is clear that each application will be considered on their individual merit, taking individual circumstances into account. Applications submitted, the success rate of applications and satisfaction levels with the service will be monitored on an ongoing basis and these results will be disaggregated according to Disability, as well as Ethnicity, Gender and Age, in order that the success of the service can be assessed and any emergent issues addressed. The planned flexibility within the operation of the scheme, will address these potential impacts for Disabled People.</p>
<p>In general, Disabled People were more likely to want to see applications, payments and reviews dealt with more quickly than other groups.</p>	<p>Amendment has been made to the draft policy which reduces the eligible age to 16 years old (shown in paragraph 3.1 of the amended policy)</p> <p>The advantages of this are twofold:</p> <ol style="list-style-type: none"> 1. It possible in qualifying circumstances to support as appropriate vulnerable young adults, and 2. It will match the council's entitlement age with other government based benefits ensuring equity in our approach. <p>This change enhances to positive impact which the SG Welfare Scheme will have for younger people.</p>
<p>16/17 year olds who are waiting for a claim to JSA or Income Support or ESA to be processed should also be able to apply if they are through being estranged from parents and accepted as homeless by the council. To keep it to 18+ is wrong and will put an extremely venerable group at risk. Although the DWP processes these claims as urgent there can still be up to 14 days from contact to initial payment. The process for JSA and IS means that the 16/17 yr old rings the DWP contact centre or goes to Learning Partnership West or drops in or makes contact the jobcentre. They are then booked for a new claim interview with the Under 18 adviser (only a certified</p>	<p>Amendment has been made to the draft policy which reduces the eligible age to 16 years old (shown in paragraph 3.1 of the amended policy)</p> <p>The advantages of this are twofold:</p> <ol style="list-style-type: none"> 1. It possible in qualifying circumstances to support as appropriate vulnerable young adults, and 2. It will match the council's entitlement age with other government based benefits ensuring equity in our approach. <p>This change enhances to positive impact which the SG Welfare Scheme will have for younger people.</p>

<p>Under 18 adviser can do the interview). National target to achieve this interview is 4 working days although contact to arrange the appointment must be within 4 hours. The correct claim form is done; evidence is gathered to prove the need for benefit. Paperwork is sent to DWP processing centre - at the moment this Gloucester BDC for IS and Plymouth BDC for JSA. The target to put claim into payment is 5 working days from receipt of claim at BDC. As can be seen the timetable leaves this vulnerable group without access to funds. At the moment a crisis loan application would be made 'until claim processed'. This would require whoever is administering the Welfare Grant Fund to work closely with the Jobcentres U18 advisers to ensure that help for food and immediate needs can be met.</p>	
<p>Crisis loans help when benefits have stopped, for example when they have failed to send in medical certificates on time or they have failed work capability assessments, will these gaps be considered?</p>	<p>Social fund and crisis loans will be abolished and the SG Welfare Grants Scheme is something new; not a direct replacement or mirror scheme.</p> <p>Where claimants forget to supply supporting documentation, such as medical certificates or fail capacity tests, they can apply for a welfare grant as allowed for under the policy. Where claimants qualify under the policy there is an expectation that any award is for immediate and urgent need. The supply of supporting documentation within 28 days of the Welfare Grant application is allowed as long as the circumstances remain the same as stated in the original claim, although the council may want to know how the individual applying has coped in the intervening days or weeks because of the urgent and immediate need and nature of a Welfare Grant. The management of reasonableness in this process is in part through the practical operation of the policy and as previously stated, the planned flexibility within the operation of the scheme, allows for individual circumstances to be catered for, each application being considered on its merits.</p>
<p>Support should be considered if they are on a pension.</p>	<p>It is confirmed that there is no upper age limit to those who can claim a SG Welfare Grant and therefore pensioners or older people retain equality of access to the scheme.</p>
<p>Section 3.6 of the draft policy states that payments for clothing will only be considered for expectant mothers and babies? this should be expanded to cover older children and anyone who is need who meets the other criteria (such as people leaving care who may have very few items of clothing).</p>	<p>This has been clarified through updated wording in the amended policy as shown in paragraph 2.5</p>
<p>Clarification is needed on what you class as a disaster that could mean anything?</p>	<p>This has been clarified through updated wording in the amended policy as shown in paragraph 3.2</p>
<p>Need essential medication e.g. NHS prescription cost while waiting for benefits or salary to come in.</p>	<p>The majority of people meeting the criteria for the Welfare Grant Scheme will be eligible for free prescriptions. However, it is likely that those who are not eligible for free prescriptions will be able to apply for the NHS low income scheme.</p>
<p>Pet caring costs e.g. elderly person admitted to hospital may not be able to meet the costs of their pet being cared for whilst in hospital (if no voluntary sector bodies able to help). Without help they may</p>	<p>There has been no amendment to draft policy due to the existence of PDSA and other animal based support charities. However, it is also noted that as per the first point in</p>

<p>have to lose their pet which could be their lifeline when leaving hospital in terms of company and motivation for getting up/ out to care for their pet.</p>	<p>this table, Disabled People with, for example, assistance dogs, could be impacted and it is clear that the planned flexibility within the operation of the scheme, will address these potential impacts for Disabled People.</p>
<p>Where 'vulnerability' in any area that has not been mentioned but where there is an 'urgent' and life saving need</p>	<p>Amendment to draft policy paragraph 3.6 has been made.</p> <p>The policy has been amended to allow applications from people who do not meet the qualifying criteria as laid down in paragraph 3.1 but do meet the criteria in Para 3.2 and in exceptional circumstances their application will be considered.</p> <p>In this way the council are not unduly fettering their discretion and are able to support urgent and life saving need not otherwise met by the policy.</p>
<p>There is no mention in the proposal of any intention to offer support with rent in advance for securing private rented accommodation. Although it is sometime possible to get this through a budgeting loan – this is only available to a proportion of those on a low income who are in desperate need of accommodation. Access to help with deposits is restricted and often rent in advance is not paid. Assistance with rent in advance would be a massive help for some people who might otherwise be homeless, sofa surfing or taking up beds in supported housing because they are unable to move on.</p>	<p>The approach of the SG Welfare Grant scheme is to seek to support our communities by a multi departmental approach when individuals are in urgent and real need. In each application support would be looked at from the most appropriate route. Payment of cash or making a loan in advance are not covered within the policy.</p> <p>Whilst the policy may not expressly state rent in advance as a category of support neither does it preclude it. In the circumstances outlined, the council would want to explore, for example, support through a deposit security option, housing benefit entitlement and potentially discretionary housing payments. Each application would be considered on its merits against the policy which is intended to support our communities and qualifying individuals at times of temporary urgent need often when no other recourse is available.</p>
<p>Does “establishing a home in the community” include moving on from Supported Housing? This is a crucial time for many young people in moving towards independence and being able to secure the essential items to make their accommodation into a home can make the difference between successful tenancy sustainment and tenancy failure.</p>	<p>The SG Welfare Grant scheme is not a direct replacement for the DWP scheme and is intended within limited resourcing to meet real and urgent need. Where a young person presents a need that meets the qualifying criteria covered within the policy consideration will be given to help. This help may comprise different forms as outlined in the policy for example from advice and support to practical supply of goods by a third party or a pre charge card dependent on individual circumstances. This is not a cash based system. Being an award (and application) scheme the council will consider all avenues to meet the qualifying and presented need and in the circumstances outlined may consider entitlement to any other benefit including housing benefit/universal credit and discretionary housing payments therefore in some circumstances the award may therefore innovatively consider welfare or debt advice as a potential way forward.</p>
<p>We welcome the intention to provide a comprehensive service, linking all those points of contact and service provision within the authority. We would also like to see mention of the support that can be provided by the local authority under its responsibilities for children and young people, and for vulnerable adults of any age and a commitment</p>	<p>It is the broad assumption of the scheme that the council, agencies of government and indeed the third sector support our communities. By implication where the most appropriate route for support is determined and it is identified that the responsibility in law is administered by another department for example the Children, Adults and Health department</p>

<p>that an appropriate internal referral would be made.</p>	<p>a referral would be made and in return be a route for receiving an application request for a Welfare Grant.</p>
<p>Often the reason for a need is that an entitlement to a benefit does not necessarily equate to someone being in receipt of that benefit. This may be because a claim has not been made (perhaps for mental health reasons), a claim is taking an unusual length of time to process and no interim arrangement is in place, or possibly that the payment has gone astray 'in the system' or has been stolen or lost. Entitlement to may be a better measure than receipt of a qualifying benefit.</p> <p>You will also need to add, for some considerable time to come, JSA, ESA, WTC, and DLA to this list, until PIP and UC are fully implemented.</p>	<p>Whilst the council in administering the Welfare Grant Scheme is explicitly supporting those people on qualifying benefits as stated in paragraph 3.1 it has amended the scheme following consultation to allow consideration of applications at paragraph 3.6 in exceptional circumstances from those individuals who do not meet the eligibility criteria. This ensures a positive impact for people representative of all equalities communities.</p>
<p>You may wish to consider the position of older people who have set aside some or all of their savings for their funerals, and who would find it extremely distressing to be required to spend this money. Maybe consider a disregard of a few thousand pounds for this purpose where the customer has made this provision?</p>	<p>The Welfare Grant Scheme is designed to meet urgent life saving need and a minimum sum of £100 in available assets is designed to ensure resources are prioritised to best effect.</p> <p>The council anticipates that the Welfare Grant money is awarded in urgent situations where individuals have recourse to no other money or solution. In situations that are life threatening and there is real urgent need spending long term savings of thousands of pounds may in some circumstances be the only solution to overcoming a one off life crisis. Each application would be considered on their individual merit which again ensures a positive impact for people representative of all equalities communities.</p>

SECTION 3 - IDENTIFICATION AND ANALYSIS OF EQUALITIES ISSUES AND IMPACTS

Equality Group	Negative Impact	Positive Impact	No Impact	Unsure of Impact	Reason(s)
Women/Girls	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Data shows that women are more likely to be impacted in respect of Community Care Grants. The policy is clear that it will treat each customer fairly and equitably with full consideration given to individual circumstances. Additionally, equalities monitoring will be conducted on an on-going basis in order to proactively identify any issues emerging.
Men/Boys	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Data shows that men are more likely to be impacted in respect of Crisis Loan Living Expenses and Crisis Loan Alignments. The policy is clear that it will treat each customer fairly and equitably with full consideration given to individual circumstances. Additionally, equalities monitoring will be conducted on an on-going basis in order to proactively identify any issues emerging.
Lesbians, gay men & bisexuals	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	There is no evidence to suggest that these groups are more likely to be impacted by any of the issues emerging from the proposed SG Welfare Grant Scheme.
Transgender people	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
White people (including Irish people)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	There is currently no evidence to suggest that these groups are more likely to be impacted by any of the issues under consideration. However, there is evidence to show that people from minority ethnic backgrounds ¹ generally have lower levels of income, and equalities monitoring will be conducted on an on-going basis in order to proactively identify any issues emerging. A full range of application methods are available in addition to online and written (e.g. face-to-face and telephone) which intends to be inclusive for those who require these methods.
Asian or Asian British people	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Black or Black British people	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
People of mixed heritage	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Chinese people	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Travellers (gypsy/Roma/Irish heritage)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
People from other ethnic groups	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

¹ Source: Joseph Rowntree Foundation programme paper: *Poverty and ethnicity. Inequality within ethnic groups.* Lucinda Platt, May 2011. ISBN 978 1 85935 813 9

Equality Group	Negative Impact	Positive Impact	No Impact	Unsure of Impact	Reason(s)
Disabled People:					
Physical impairment	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>As a result of the consultation feedback, and subsequent amendment to the policy, it is clear that each application would be considered on their individual merit which ensures that a full diversity of situations can be positively addresses and a positive impact for people representative of all equalities communities made.</p> <p>There is evidence to show that disabled people² generally have lower levels of income, and equalities monitoring will be conducted on an on-going basis in order to proactively identify any issues emerging.</p> <p>A range of application methods are available in addition to online and written (e.g. face-to-face and telephone) which intends to be inclusive for those who require these methods.</p>
Sensory impairment	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Mental health condition,	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Learning disability/difficulty	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Long-standing illness or health condition	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Other health problems or impairments	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Older People	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>As a result of consultation feedback, the policy has been amended to reduce the eligible age to 16 years old. It is also confirmed that there is no upper age limit to those who can claim and therefore pensioners or older people retain equality of access to the scheme.</p> <p>The policy is clear that it will treat each customer fairly and equitably with full consideration given to individual circumstances. Additionally, equalities monitoring will be conducted on an on-going basis in order to proactively identify any issues emerging.</p>
Children and Young People	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Faith Groups	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>There is no evidence to suggest that these groups are more likely to be impacted by any of the issues under consideration.</p>
Pregnancy & Maternity	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Marriage & Civil Partnership	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

² Source: Guy Parckar, Leonard Cheshire Disability, 2008. Figures based on the 'relative poverty line' in the UK, which equates to living in a household with income of less than 60% of median national income. Recent estimates suggest that around 30% of disabled people live below this income line, compared to around 16% of non-disabled people.

SECTION 4 - EqIAA OUTCOME

There are four core outcomes for EqIAAs. The outcome of this particular EqIAA is indicated in the table below.

Outcome	Response	Reason(s) and Justification
Outcome 1: No major change required.	<input checked="" type="checkbox"/>	As a result of consultation feedback and the analysis conducted in relation to equalities, the policy has been amended in order to ensure equality of access for all. Equalities monitoring will be conducted on an ongoing basis, the results of which will be analysed and inform future development and continuous improvement as appropriate.
Outcome 2: Adjustments to remove barriers or to better promote equality have been identified.	<input type="checkbox"/>	
Outcome 3: Continue despite having identified potential for adverse impact or missed opportunities to promote equality.	<input type="checkbox"/>	
Outcome 4: Stop and rethink.	<input type="checkbox"/>	

SECTION 5 - ACTIONS TO BE TAKEN AS A RESULT OF THIS EqIAA

Implement ongoing equalities monitoring to capture:

- Applications
 - Success rates of applications
 - Customer satisfaction levels
- disaggregated according to Disability, Age, Ethnicity and Gender

SECTION 6 - EVIDENCE INFORMING THIS EqIAA

- South Gloucestershire Welfare Grants Scheme consultation feedback results.
- Department of Work and Pensions (DWP) data relating to South Gloucestershire for the year 2011/12 in respect of both Crisis Loans and Community Care Grants.
- Joseph Rowntree Foundation programme paper: *Poverty and ethnicity. Inequality within ethnic groups*. Lucinda Platt, May 2011. ISBN 978 1 85935 813 9
- Guy Parckar, Leonard Cheshire Disability, 2008.

INITIAL EQUALITY IMPACT ASSESSMENT AND ANALYSIS (EqIAA)

SOUTH GLOUCESTERSHIRE WELFARE GRANTS SCHEME

SECTION 1 - INTRODUCTION

In October 2010 the government published the White Paper 'Universal Credit: welfare that works', detailing the government's proposals for wide-ranging welfare reform. This has been included in the Welfare Reform Act and the reform of the Discretionary Social Fund currently administered by the Department for Work and Pensions (DWP). It is proposed that this will be replaced with a discretionary scheme administered by South Gloucestershire Council from April 2013.

To help local communities identify and meet the needs of people who are most vulnerable, the government believes the service should be delivered locally. Through localising the service it should be possible to improve the quality of decision making and integrate with locally designed programmes that can provide complementary assistance to people who most need support.

The elements of the Discretionary Social Fund that will be replaced with local provision are:

- Community Care Grants
- Crisis Loans.

Crisis Loans are intended to meet immediate needs such as general living expenses or items needed following a disaster and entitlement is not dependent upon receipt of a benefit.

Community Care Grants (CCG's) are non-repayable grants to enable vulnerable customers to live in the community and are conditional upon receipt of an income related benefit.

South Gloucestershire Council is preparing to launch a new service called the South Gloucestershire Welfare Grant Scheme. This will replace the Social Fund Community Care Grants and Crisis Loans currently administered by the Department of Work and Pensions. This new service will start on 1st April 2013.

A provisional budget for South Gloucestershire of £344,000 was announced by the government which will be less than the DWP has spent in previous years. The budget is fixed, therefore, the service must make the most of the money available to help as many people as possible, throughout the year.

The scheme will be reviewed throughout the first year to ensure we are using all local information from applications to refine the scheme on an on-going basis.

The scheme will consider paying awards under two types of need:

3. to people who require immediate support, and
4. to people who require assistance to establish or maintain a home in the community.

The scheme will seek to provide a range of support, taking into account alternative local provision including Discretionary Housing Payments, Disability Related Expenditure allowances within social care charging policy, Council Tax Support and Disabled Facilities Grant

Eligibility criteria for the scheme are subject to consultation; however, currently, it is proposed that customers who may be eligible are those:

- Aged 18 or over
- A resident of South Gloucestershire or
- Have direct immediate current family linkages to SGC residents **or**
- Be abandoned, destitute with no “friends” within the SGC area **and** with no other means of moving on **or** immediate support **and**
- Be in receipt of a qualifying benefit:
 - i. Universal Credit
 - ii. Personal Independence Payment
 - iii. Local Council Tax Support
 - iv. Income Support
 - v. Housing Benefit
 - vi. Higher Rate Attendance Allowance

Generally only two applications (qualifying or not) can be made for a South Gloucestershire Council WG in any 12 month rolling period, except in wholly exceptional circumstances, for example:

- Need identified temporary support not provided by any other means
- Be recognised as a personal one off crisis
- Not the result of civil emergency, state of war **or** other national, civil **or** natural disaster beyond the borders of South Gloucestershire Council.
- Not deemed a qualifying reason as determined by South Gloucestershire Council Discretionary Panel Board

SECTION 2 - CONSULTATION

The Council issued a public consultation with regard to South Gloucestershire Welfare Grant Scheme.

The consultation commenced on 26th November 2012 and will conclude on 8th February 2013.

- Consultation methods to be entered post consultation.
- Consultation response rates to be entered post consultation.

Consultation Results

The consultation includes questions in relation to respondent's:-

- Gender
- Age
- Ethnic Origin
- Disability

in order that results can be disaggregated in respect of the questions raised.

Consultation feedback results to be entered post consultation.

SECTION 3 - RESEARCH CONDUCTED

Information provided by the Department of Work and Pensions (DWP) relating to South Gloucestershire for the year 2011/12 shows the following:

In respect of both Crisis Loans and Community Care Grants, most applicants had no children aged 16 or younger however, where there were children under 16 years, the youngest child was most likely to be 0 – 5 years:-

2011/2012 (Full Year)	Crisis Loan Items	Crisis Loan Living Expenses	Crisis Loan Alignments	Community Care Grants
Age of youngest child				
0-5	20%	22%	10%	33%
6-8	3%	3%	2%	7%
9-12	1%	3%	2%	4%
13-16	3%	2%	2%	4%
No children 16 or under	72%	71%	84%	52%

In respect of both Crisis Loans and Community Care Grants, the majority of applicants were aged 18 – 24 years. However, ages 25 – 34 and 35 – 44 featured significantly:-

2011/2012 (Full Year)	Crisis Loan Items	Crisis Loan Living Expenses	Crisis Loan Alignments	Community Care Grants
Age of recipient				
Under 18	0%	1%	3%	1%
18 to 24	36%	37%	44%	25%
25 to 34	33%	31%	27%	29%
35 to 44	20%	19%	15%	21%
45 to 54	10%	10%	9%	14%
55 to 64	1%	3%	1%	8%
65 to 69	0%	0%	0%	2%
70 to 79	0%	0%	0%	2%
80 to 89	0%	0%	0%	0%
90 and over	0%	0%	0%	0%
Unknown	0%	0%	0%	0%

In respect of both Crisis Loans and Community Care Grants, households of a single male or single female featured most significantly:-

2011/2012 (Full Year)	Crisis Loan Items	Crisis Loan Living Expenses	Crisis Loan Alignments	Community Care Grants
Household Type				
Couple	9%	12%	6%	15%
Single Female	44%	39%	29%	54%
Single Male	47%	50%	65%	30%

Note:- Awards & applications rounded to nearest 10

SECTION 4 - IDENTIFICATION AND ANALYSIS OF EQUALITIES ISSUES AND IMPACTS

Equality Group	Negative Impact	Positive Impact	No Impact	Unsure of Impact	Reason(s)
Women/Girls	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Data shows that women are more likely to be impacted in respect of Community Care Grants. The policy is clear that it will treat each customer fairly and equitably with full consideration given to individual circumstances. Additionally, equalities monitoring will be conducted on an on-going basis in order to proactively identify any issues emerging.
Men/Boys	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Data shows that men are more likely to be impacted in respect of Crisis Loan Living Expenses and Crisis Loan Alignments. The policy is clear that it will treat each customer fairly and equitably with full consideration given to individual circumstances. Additionally, equalities monitoring will be conducted on an on-going basis in order to proactively identify any issues emerging.
Lesbians, gay men & bisexuals	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	There is no evidence to suggest that these groups are more likely to be impacted by any of the issues under consideration.
Transgender people	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
White people (including Irish people)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	There is currently no evidence to suggest that these groups are more likely to be impacted by any of the issues under consideration. However, there is evidence to show that people from minority ethnic backgrounds ³ generally have lower levels of income, and equalities monitoring will be conducted on an on-going basis in order to proactively identify any issues emerging. A range of application methods are available in addition to online and written (e.g. face-to-face and telephone) which intends to be inclusive for those who require these methods.
Asian or Asian British people	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Black or Black British people	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
People of mixed heritage	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Chinese people	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Travellers (gypsy/Roma/Irish heritage)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
People from other ethnic groups	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

³ Source: Joseph Rowntree Foundation programme paper: *Poverty and ethnicity. Inequality within ethnic groups.* Lucinda Platt, May 2011. ISBN 978 1 85935 813 9

Equality Group	Negative Impact	Positive Impact	No Impact	Unsure of Impact	Reason(s)
Disabled People:					
Physical impairment	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	There is no evidence to suggest that these groups are more likely to be impacted by any of the issues under consideration. However, there is evidence to show that disabled people ⁴ generally have lower levels of income, and equalities monitoring will be conducted on an on-going basis in order to proactively identify any issues emerging. A range of application methods are available in addition to online and written (e.g. face-to-face and telephone) which intends to be inclusive for those who require these methods.
Sensory impairment	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Mental health condition,	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Learning disability/difficulty	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Long-standing illness or health condition	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Other health problems or impairments	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Older People	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The Policy states that for an applicant to be eligible, they must be aged 18 or over. In instances where a person is younger than 18 years, other support is available and in place. There is a likelihood that the age will drop from 18 to 16 and this will be confirmed in the finalised EqIAA. Additionally, the data shows that younger people are proportionately more likely to be applicants. The policy is clear that it will treat each customer fairly and equitably with full consideration given to individual circumstances. Additionally, equalities monitoring will be conducted on an on-going basis in order to proactively identify any issues emerging.
Children and Young People	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Faith Groups	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	There is no evidence to suggest that these groups are more likely to be impacted by any of the issues under consideration.
Pregnancy & Maternity	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Marriage & Civil Partnership	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

Further information to be completed post-consultation

⁴ Source: Guy Parckar, Leonard Cheshire Disability, 2008. Figures based on the 'relative poverty line' in the UK, which equates to living in a household with income of less than 60% of median national income. Recent estimates suggest that around 30% of disabled people live below this income line, compared to around 16% of non-disabled people.

SECTION 5 - EqIAA OUTCOME

Section to be completed post-consultation

SECTION 6 - ACTIONS TO BE TAKEN AS A RESULT OF THIS EqIAA

Section to be completed post-consultation. This will include on-going equalities monitoring.



South Gloucestershire Welfare Grant Scheme

South Gloucestershire Council is preparing to launch a new service called the South Gloucestershire Welfare Grant Scheme. This will replace the Social Fund Community Care Grants and Crisis Loans currently administered by the Department for Work and Pensions. The new service will start on the 1st April 2013.

We would like to hear your views on how the new scheme will operate including eligibility, application process and payment methods. The consultation runs from 26 November 2012 until 8 February 2013.

To find out more about the new Welfare Grant Scheme and to view the full policy, visit our website: www.southglos.gov.uk/welfaregrant or call: 01454 868002.

Eligibility (who can claim support)

All South Gloucestershire residents are eligible to apply for funds and support, applications will be considered on an individual basis and the decision will be made based on individual circumstances. The services will link with partner agencies in order to provide holistic and sustainable support. The following questions ask for your views on eligibility and relate to sections 3 and 4 of the policy.

Q1 How strongly do you agree or disagree that residents should be eligible for support or assistance from the South Gloucestershire Welfare Grant Scheme in the following circumstances?

	Strongly agree	Tend to agree	Neither agree or disagree	Tend to disagree	Strongly disagree	Don't know
Applicant is on a low income and without access to sufficient funds to meet their immediate needs	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Applicant requires support to stay in the community	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Applicant has demonstrated that they are without immediate resource to meet the basic needs of themselves and/or their dependents	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Applicant is leaving care and requires support	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Q2 Please use this space to tell us if there are any additional circumstances where support should be considered?

Q3 How strongly do you agree or disagree that financial assistance and/or support should be provided by the South Gloucestershire Welfare Grant Scheme to customers who ...

	Strongly agree	Tend to agree	Neither agree or disagree	Tend to disagree	Strongly disagree	Don't know
Have no essential food	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Have no heating	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Require emergency travel costs	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Require essential clothing	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Need help after a disaster	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Need essential household goods e.g. bedding	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Q4 Are there any other circumstances, not included in the policy where awards should be given, please state below...

Q5 How strongly do you agree or disagree that financial assistance and/or support should not normally be considered by the South Gloucestershire Welfare Grant Scheme to customers ...

	Strongly agree	Tend to agree	Neither agree or disagree	Tend to disagree	Strongly disagree	Don't know
Who have an income or savings which they could use to meet their needs	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
To buy (or repair) TV or satellite	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
To pay housing costs or rent arrears	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
To meet motor vehicle expenses	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Q6 Are there any other circumstances, not included in the policy where awards should not be given, please state below...

Application Process (how will people apply)

The following questions link to section 5 of the draft policy

Emergency Applications

An emergency application is where someone has suffered a disaster and needs support meeting basic living costs.

Q7 For emergency applications, what do you think is an acceptable target time to make a decision about entitlement to financial support?

Within 24 hours 1 to 2 days 3 to 7 days

Q8 For emergency applications, what do you think is an acceptable target time for the payment of award following a decision being made?

Within 24 hours 1 to 2 days 3 to 7 days

Non-Emergency Applications

A non-emergency application is where someone needs help with goods or services for their home.

Q9 For non-emergency applications, what do you think is an acceptable target time to make a decision?

Within 3 days 4 to 7 days 8 to 14 days

Q10 For non-emergency applications, what do you think is an acceptable target time for the payment of award following a decision?

Within 3 days 4 to 7 days 8 to 14 days

Reviews

A review can be requested where the claimant or their representative believes the council has made a wrong decision to refuse payment or disagrees with the method or amount of payment.

Q11 Following a request for a review, what do you think is an acceptable target time for making a decision (Stage one)?

Within 3 days 4 to 7 days 8 to 14 days

Q12 If the customer is not satisfied with the outcome of the review, how long should they have to wait on a decision on a further review?

Within 3 days 4 to 7 days 8 to 14 days

Repeat Applications

Q13 Do you think that there should be a limit on the number of repeat applications from an individual claimant?

Yes No Don't know

Q14 If yes, please state your view on the maximum number of claims in any 12 month period?

Q15 Do you think that there should be an option to offer the award in the form of a loan for customers making repeat applications?

Yes

No

Don't know

Q16 If you have any views about the proposal to allow an option to offer a loan where there are repeat applications, please use the space below.

Methods of Payment (How will support be awarded)

The following questions relate to Section 6 of the draft policy

Q17 Do you think maximum limits should be placed on the following?

	Yes	No	Don't know
Particular items e.g. a cooker	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Specific living expenses	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Q18 How strongly do you agree or disagree that the method of payment should be flexible to reflect the individual circumstances of the applicant and/or the item(s) required?

Strongly agree

Neither agree or disagree

Strongly disagree

Tend to agree

Tend to disagree

Don't know

Q19 Please make any comments about methods of payment below.

Any other comments

Q20 Please use this space to make any other comments about the South Gloucestershire Welfare Grant scheme and how it could be implemented.

About you

South Gloucestershire Council is committed to making sure that our services are accessible to all members of the community. Knowing a bit more about you helps us to check everyone in the area is getting fair access to services and no one is being discriminated against. You don't have to answer the questions but it really helps us if you do.

Any information you provide will be held by South Gloucestershire Council in accordance with data protection legislation, it will remain confidential and personal information will not be published.

Q21 Are you responding as?

- A member of the public
- A voluntary or community sector organisation or charity
- A public sector organisation
- A support/advice organisation
- A town or parish council
- A business
- Other

If you are responding on behalf of an organisation, please tell us its name below

Q22 Have you applied for or received a Social Fund Community Care Grant or Crisis Loan from DWP in the past?

- Yes No Don't know

Q23 Please tell us your full postcode

Q24 Are you? Male Female Prefer not to say

Q25 How old are you?

- Under 19 35 to 44 65 to 74
 19 to 24 45 to 54 75 or over
 25 to 34 55 to 64 Prefer not to say

Q26 What is your employment status?

- Retired
- Self employed
- Looking for work
- In paid work (full time)
- In paid work (part time, less than 30hrs per week)
- Student (full time education or training)
- Volunteer (unpaid work)
- Other
- Prefer not to say

Q27 Do you consider yourself to have a disability?

- No
- Prefer not say
- Yes - Physical impairment, such as difficulty using arms or mobility issues which may mean using a wheelchair or crutches
- Yes - Sensory impairment, such as being blind/ having a serious visual impairment or being deaf/ have a serious hearing impairment
- Yes - Mental health condition, such as depression, anxiety or schizophrenia
- Yes - Specific learning difficulty, such as dyslexia or dyspraxia
- Yes - Learning disability/ difficulty (such as Downs Syndrome, dyslexia, dyspraxia) or cognitive impairment (such as autistic spectrum disorder)
- Yes - Long standing illness or health condition, such as cancer, HIV, diabetes, chronic heart disease or epilepsy
- Yes - other

If yes, please tell us what impact your disability could have on the way you access the Welfare Grant Scheme and what reasonable adjustments you think need to be made.

Q28 Please tell us your ethnic origin

- | | |
|--|--|
| <input type="checkbox"/> Arab | <input type="checkbox"/> Mixed/multiple ethnic group - White & Asian |
| <input type="checkbox"/> Asian/Asian British - Bangladeshi | <input type="checkbox"/> Mixed/multiple ethnic group - White & Black African |
| <input type="checkbox"/> Asian/Asian British - Indian | <input type="checkbox"/> Mixed/multiple ethnic group - White & Black Caribbean |
| <input type="checkbox"/> Asian/Asian British - Pakistani | <input type="checkbox"/> Mixed/multiple ethnic group - Other |
| <input type="checkbox"/> Asian/Asian British - Chinese | <input type="checkbox"/> White - English/Welsh/Scottish/Northern Irish/British |
| <input type="checkbox"/> Asian/Asian British - Other | <input type="checkbox"/> White Irish |
| <input type="checkbox"/> Black/African/Caribbean/Black British - African | <input type="checkbox"/> White - Other |
| <input type="checkbox"/> Black/African/Caribbean/Black British - Caribbean | <input type="checkbox"/> Prefer not to say |
| <input type="checkbox"/> Black/African/Caribbean/Black British - Other | |
| <input type="checkbox"/> Gypsy or Traveller of Irish heritage | |

Other, ethnic origin, please specify

**Thank you for taking part in this survey. Please return it to:
FREEPOST RRZE-CTRG-TJLJ, South Gloucestershire Council, Welfare Grant Scheme
Consultation, Council Offices, Castle Street, Thornbury, Bristol, BS35 1 HF**

Appendix 3 – Consultation Feedback and Comments

Q2 Please use this space to tell us if there are any additional circumstances where support should be considered

The council received 19 comments in relation to this question. These are listed below:

- 16/17 year olds who are waiting for a claim to JSA or Income Support or ESA to be processed should also be able to apply if they are through being estranged from parents and accepted as homeless by the council. To keep it to 18+ is wrong and will put an extremely vulnerable group at risk. Although the DWP processes these claims as urgent there can still be up to 14 days from contact to initial payment. The process for JSA and IS means that the 16/17 yr old rings the DWP contact centre or goes to Learning Partnership West or drops in or makes contact the jobcentre. They are then booked for a new claim interview with the Under 18 adviser (only a certified Under 18 adviser can do the interview). National target to achieve this interview is 4 working days although contact to arrange the appointment must be within 4 hours. The correct claim form is done; evidence is gathered to prove the need for benefit. Paperwork is sent to DWP processing centre - at the moment this Gloucester BDC for IS and Plymouth BDC for JSA. The target to put claim into payment is 5 working days from receipt of claim at BDC. As can be seen the timetable leaves this vulnerable group without access to funds. At the moment a crisis loan application would be made 'until claim processed'. This would require whoever is administering the Welfare Grant Fund to work closely with the Jobcentres U18 advisers to ensure that help for food and immediate needs can be met.
- As a one-off; emergency; or for specific item or service
- Circumstances can be varied.
- Crisis loans help when benefits have stopped for example when they have failed to send in medical certificates on time or they have failed work capability assts. will these gaps be considered?
- Everything should be based on needs. If a family is on low income obviously I wouldn't want children to starve however I wouldn't want to see the families with luxury items either i.e. i-phones etc.
- For individuals with drug and/or alcohol issues; mental health issues; offenders etc
- If people are aware that this exists many people could ask for support; due to changing times people could ask for allsorts of support to continue to maintain some sort of life.
- In all circumstances the fund should be used to support clients in short term crisis - not long term
- many care leavers will have come through supported housing and whilst not directly leaving care at that point should still be considered as such
- More information needs to be given regarding what is considered basic needs and what not - e.g. washing machine; freezer; microwave. These may not be considered essential but the provision of such goods can enable impoverished households to stretch their limited income further.
- Non self induced Medical dilemma
- Persons not in receipt of any income support but who have paid insurance stamps and benefit is over the income support level.
- Relationship breakdown - not all victims of domestic violence recognise it as such and may suffer from less well recognised aspects of domestic violence such as financial and emotional.
- Resettlement following domestic violence; following bereavement of carer/parent of resident with physical disability; learning difficulties & mental health issues.
- Short Term crisis support
- Support should be considered if they are on a pension
- To support families and help families stay together. To support home adaptations for disabled children and adults so they can stay with their families.
- When considering eligibility on grounds of no income officers assessing applications will have to look at what the applicant is actually receiving; rather than what they should theoretically be

getting in benefits. There may also be a need to offer support to people with disabilities who are waiting for an appeal to be heard (from October 2013 new rules will come into place which mean someone appealing against an ESA decision will not receive interim payments while waiting for a mandatory reconsideration to be done by DWP staff; even though the government has not set a time-limit for these reconsiderations to be carried out ?" this may leave many people with severe disabilities in a limbo where they have no entitlement to sickness benefits but are unable to meet the rules for mandatory activity for JSA; leaving them without any income at all for many months.) Applicants may need specialist welfare benefits advice around; for example; HB run-on if starting work; which may reduce the need for support from this fund. Section 3.6 of the draft policy states that payments for clothing will only be considered for expectant mothers and babies ?" this should be expanded to cover older children and anyone who is need who meets the other criteria (such as people leaving care who may have very few items of clothing). Section 3.7 of the draft policy states that costs associated with care provision " we are concerned that there may be costs incurred by people with disabilities that should be considered for inclusion in a WGS application (at least in the short term) while arrangements for care packages or applications for disability benefits are pending; and that an expectation that these costs will not be covered may be detrimental to the well-being of people with disabilities.

- Where People are at Risk of Homelessness due to Domestic Violence or need to flee. Here people are vulnerable and require housing support

Q4 are there any other circumstances, not included in the policy where awards should be given, please state below.

The council received 14 comments in relation to this question. These are listed below:

- As mentioned above it is vital that assessors look at what is actually happening in an applicant's life; rather than theoretically considering what should be happening in it is no use telling an applicant that they shouldn't be getting support from another source (i.e. another benefit; charity; or statutory service) when a breakdown in another part of the support mechanism has meant the applicant isn't actually receiving all the support they should. Decisions need to be made based on the reality of the applicant's current situation.
- Care leavers setting up home following foster care supported housing and similar who will need 'everything'.
- Clarification is needed on what you class as a disaster that could mean anything?
- Household items that cannot be budgeted on the benefit threshold.
- If a tenant moves to a property where there is oil heating they should be helped if necessary with the initial costs of filling the tank.
- Need a Place of safety
- Need essential medication e.g. NHS prescription cost while waiting for benefits or salary to come in.
- Not sure what other (third sector) agencies could also offer help. I would hope people would be signposted to others who might be able to offer help.
- Pet caring costs e.g. elderly person admitted to hospital may not be able to meet the costs of their pet being cared for whilst in hospital (if no voluntary sector bodies able to help). Without help they may have to lose their pet which could be their lifeline when leaving hospital in terms of company and motivation for getting up/ out to care for their pet.
- Please see previous remarks re the 16/17s without recourse to parental support.
- See previous reply - a major cost to households is the provision or replacement of white goods which can enable the household to stretch their income e.g. freezer or washing machine. Often the cost of replacing these items is prohibitive and low income households often are already overstretched with social fund loans taken out for other items.
- Special clothing for Disabled People and extras cost so much and do not come out of daily money. Help with getting about and extra carers needed sometimes money being stopped from many is causing great distress.

- Travel costs would depend on the reason for needing to travel. Replacement of essential medical equipment i.e. wheelchair. One toy at Christmas where a child will not get anything.
- Where 'vulnerability' in any area that has not been mentioned but where there is an 'urgent' and life saving need

Q6 Are there any other circumstances, not included in the policy where awards should not be given, please state below...

The council received 15 comments in relation to this question. These are listed below:

- Award should be given; rent in advance where confirmed with the landlord if the move is due to being 'on the streets' homeless or due to circumstances beyond the persons control and there is serious risk to health or safety
- For social activities that cost money - i.e. cinema trips; trips to tourist attractions
- If rent arrears could mean the loss of a home even though efforts are being made to address them it may be cost effective to assist rather than that individual needing emergency housing
- In rural areas a motor vehicle could be a necessity to get to work/interview/health appointment. Re housing costs - as I am aware some private landlords are not perfect and some properties are damp and draughty. Not sure how this would be picked up.
- People may have income/ savings to meet their needs but due to significant event could have difficulty in doing this in reasonable timescale. May also need to give notice on savings. In these circumstances this category of people should be entitled to interest free loan.
- People not through their own fault may be party too the absolute poverty measure relative property issues if not met cause more problems with partners and children which in a civilized society they should not be denied access of mainstream society.
- Please note I have answered as above only because I believe there are other funds which can be used e.g. for housing costs. Also; the amount of savings and income which would be set as a limit needs to be specified.
- Re Housing costs - It is highly likely that applicants may have a need for a small amount of support while waiting for HB claims to be processed; while transferring from a benefit claim to a monthly wage; or from a monthly wage back to a benefit claim it may be that a small financial intervention would have a significant impact on an applicants ability to remain in their particular community with all the positives this implies; it should therefore be accepted that though these payments may not need to be made often; there may be some occasions where they can be justified as a good use of these limited resources. This could also be seen to meet the desire to ensure that people can remain in their communities; as listed in Q3.
- Taking away peoples mobility being car or other transport can be the down fall of many. People cannot stand around on Bus stops for a non exist bus now and not being very stable on their feet adds to pressure of insular ness and withdrawnness. The people that need company at any age can have many barriers and are not able to have a Travel pass or funds to go out where they can mix many rural people can be affected.
- To repair/replace TV /satellite for those in community for whom TV is a lifeline/ company e.g. the elderly; housebound. To help with housing costs to secure a tenancy for low income families and vulnerable residents. To help with one off vehicle costs (repairs) if that help would enable the individual retain employment and so prevent poverty.
- When their benefit payments are subject to disallowance for not looking for work or other reasons that the DWP stop payment.
- When they have more than two children
- Where sensible steps to mitigate their loss have not been taken then grants should not be paid. Where loans can be made or payment deferred; grants should not be made; in particular for services run by the council where they can agree a payment schedule
- Where the person can afford to smoke and drink.
- Working on crisis loans I am aware that customers frequently ring and say they have "lost" their money - usually on the day their benefits have been paid. Everyone knows this is not true but usually you have to pay. Generally it is because they owe money to pay day loans or door stop lenders. I do not agree lost money should be considered

Q16 if you have any views about the proposal to allow an option to offer a loan where there are repeat applications, please use the space below.

The council received 26 comments in relation to this question. These are listed below:

- A loan should be the first option for ALL awards unless there are extremely unusual circumstances. The loan should be interest free.
- All Loans should be repayable with a fixed period of time e.g. 12 months
- As you only have a limited budget if you let them customers will keep coming back again and again. Some people have applications in the 100's and just expect to get more and more money. They will probably owe a substantial amount to crisis loans already then you would be taking back money too this will leave even deeper in debt
- I found this hard to complete because I know money is tight and so many people have different needs. Sometimes people need support to get themselves out of a mess rather than the council just paying for things. So I couldn't answer q 13 and 15 because some people may need this whilst others may abuse the situation.
- I think that the offer of a loan is a sensible option; we all have to manage our finances and nothing is for free. Equally; it needs to be made clear this is a last resort
- I think there should be a credit check and also that money should be repaid directly from benefits/wages to ensure that work is created chasing defaulters
- If in genuine need the grant needs to be for a specific purpose a loan would suggest could use the money for other purposes.
- It is dependant upon what criteria it would come under and how vulnerable the person/family are
- It needs to be clear that the individual is able to repay the loan within a set time period.
- It will cost more to administer and recover a loan than the amount involved. The claimants will be on benefits and little income so repaying a loan just adds to their problems. Either they are entitled under the SGC grant scheme or not.
- Loan based on ability to pay and not offered if a person is unable to pay. This is not an option where a person is already in poverty
- Loans with easy repayments are needed to the right people but can cause much heartbreak. Small loans and constant feedback needed.
- Money would not be recovered and this would affect the ability to fund others in crisis who have not made more than 2 claims for support.
- Option to have a loan should be a last resort as how will they repay it if they don't have any money? Also if to cover emergencies should be one off circumstances not something that comes up regularly - maybe should have their finances investigated if coming up regularly
- Re. limit on repeat applications: Applications should be viewed on merit; as some individuals may be unluckier than others; ore chaotic than others; or have circumstances which lead to higher likely rate of applications (pre-existing high levels of debt; for example; which could lead to an inability to budget for white good etc). Clients should be informed that there is a maximum of 3 Crisis Loans per year; but it may be suitable for SGC to have internal guidance that allows them to breach this in the most exceptional of circumstances
- Repayment should be individually assessed based on ability to live on what is left after loan repayment is taken
- Repayments would need to be achievable and ideally interest free.
- Repeat applications are unlikely to be for the same item and therefore need to be treated individually. NB: RE PREVIOUS PAGE - AS A SUPPORT WORKER A SHORT TIME LIMIT FOR APPEALS TO BE MADE IS UNHELPFUL.
- The current system is a loan which is reasonable. Possible emergency payments could be funded by the government.
- The only thing id say with the loan is that the person accepting a loan can make the repayments and that they are reasonable
- There should be a maximum AMOUNT of £500 in 12 months and only in the case of a major disaster should that figure by any higher. After 1st application a telephone interview should be

done to ascertain why a second application needs to be done. If reporting lost or stolen funds then a police report and crime ref no should be required. The scheme should be loan based. A grant (not being paid back) should be only given in when a major disaster has happened and then only after a face to face interview is done. From experience if the word goes out that no payback is required the budget won't last 3 months.

- There would be arrears left right and centre. Someone would then need to be employed to chase these up
- This should only be considered where there are clear means of repayment and should be used as a legitimate alternative to pay day loan options. Interest should be charged but at very competitive rates. Early repayment should be encouraged.
- To arrange repayments via benefits entitlement at a rate the person/family can afford. Think if there are repeat applications an interview should take place to explore reasons and to look at income if it can be increased and to offer budgeting advice. Ultimately need to encourage independence; particularly in light of shift to universal credit.
- Use of a Credit Union. Who sits on the appeal Board and are they able to turn the decisions round in a short time?
- Whilst I can think of extreme circumstances where someone may need to make repeat applications I am concerned that repeat applications will be from individuals who see the funds as "easy money" when alternative sources of help would provide a more sustainable option. A loan approach may deter repeat applications but a robust repayment process would need to be put in place.

Q19 Please make any comments about methods (of payment) below

The council received 24 comments in relation to this question. These are listed below:

- Agree no cash but any other flexible approach 'smart card' type
- All crisis loans should be made in the form of food vouchers or credit on gas or electric meters or if is for goods they should be ordered on behalf of the customer from a central provider e.g. Argos or Ikea for furniture. Thereby a discount can be negotiated from the supplier thus making the budget go further.
- All payments should be in voucher form made out to a nominated supplier
- Care needs to be taken to ensure that payment is used for reason identified
- Every one knows that the payments don't get used for what they are intended - i.e. food gas and elec. the only way to ensure this happens is by giving food vouchers and voucher for electricity/gas which I totally agree with and we have been calling for on crisis loans for years
- I don't think payments should be made in cash as this encourages misuse
- I would be cautious about offering 'cash cards'; vouchers as I would be concerned that people could be targeted for these cards; and then not be able to reapply and still be without the items the cards were given for. This could make vulnerable people more vulnerable. Possibly links to the shops would be better than giving out cards to individuals. If it was possible for individuals to spend their voucher value in store; without the need for a card on their person may be safer.
- I would want to know that the payment was definitely spent on the item and not given as cash. Again I think there should be flexibility as everyone has different needs.
- If issuing vouchers for goods e.g. furniture the council needs to be providing an extensive list of providers and checking these are adequate - e.g. local charities such as Kingswood furniture routinely charge high prices for very shoddy goods. Disagree with issuing any vouchers for use in e.g. supermarkets which mean service users can be noticed to be benefit recipients.
- In administering awards SGC needs to ensure that it meets the needs of its vulnerable residents but at the same time does not leave itself open to abuse/fraud.
- It may be worth considering if the items required could be ordered directly from the supplier/provider and the money reclaimed from the 'borrower'
- Low payments mean purchasing second hand goods which do not last the normal working period.
- Need a standard criteria for all
- No cash payments should be allowed; only BACS payments into a bank account.

- Payment should ensure that grants are used to buy the item required so vouchers would be a good choice.
- Re. maximum limits on costs: It seems logical to have a limit on cost of goods; if they are not being provided directly by an approved supplier for instance the second cheapest in the normal Argos catalogue may be sufficient for most applications. We would suggest that payments for living costs get pegged to an already understood measure of reasonable living costs. This could be either the Personal Allowance rates for means-tested benefits or to the trigger figures used for the Common Financial Statements (available from the Money Advice Trust; the British Bankers Association; or Citizens Advice). Both of these would provide the flexibility needed as they have varied components depending on household make-up and are fixed to particular periods of time.
- Should avoid cash payments where at all possible. Use vouchers or an allowance given straight to an organisation that will provide the items needed.
- Should be payment in kind like direct provision of essential goods; food bank; travel token not cash.
- Signposting to other places of help and support.
- Vouchers for food cards for gas electric. Vouchers redeemable at participating stores for household goods. NO CASH.
- Where possible the payment should be direct to the supplier i.e. a new cooker to ensure spent on what's required.
- Wherever possible payment should be made in terms of goods to deter fraud. Has consideration been given to loaning goods in the short term?
- Whilst I can understand the desire to avoid paying cash often the need to source 'bargains' makes cash the sensible option; could consideration be given to paying a cash payment to the supporting agency to spend with the applicant.
- with each case being individual based on income; much low income around now with very little hope of any big increase from government due on low pay sector and disabled people. Post office must be considered and used as many people still do not have bank accounts

Q20 Please use this space to make any other comments about the South Gloucestershire Welfare grant scheme and how it could be implemented.

The council received 23 comments in relation to this question. These are listed below:

- A detailed standard form to be issued to customers on request and to those likely to refer; such as resettlement officers; Community Care & Housing and agencies offering support in the SGC area. Face to face assistance given to help with applications and explain process for those considered vulnerable without support.
- All payments in voucher form; no cash or personal cheques.
- As someone who works with care leavers often any grant that we hold will have been used prior to them turning 18yrs many of the items purchased become lost stolen etc during the numerous moves they often have to undertake B&B; supported housing and similar. When they're ready for a flat we're often starting from scratch it could be very helpful in many cases if the payment could be made to ourselves (this was something that used to occur many years ago via CCG) as often our clients aren't used to being responsible for large amounts of money.
- Consideration should be made priority to people with dependants on low income who do not receive much benefit relief (i.e. homeowners in part-time employment below the total hours threshold to receive tax credits). This group is at great risk due to lack of financial support from DWP / HMRC.
- have made these comments throughout the form however: 1. flexibility of payment; council needs to avoid a repeat of the situation where asylum seekers were given vouchers which marked them out as in receipt of benefits; 2. need to have a wide list of providers of goods and avoid coercing people to spend their grants in shops where the pricing is inflated and the goods shoddy; 3. The council needs to provide further detailed guidance about what it will and will not fund and to be flexible in its attitude to repeat requests and towards definitions of necessary items.

- Hope to hear good news on this in the New Year and advertising of this is paramount for all locally. If people do not know this exists they cannot use it. Housing associations provide us with literature and the south glos booklet also. Please use this system plus others locally; library's health centres; hubs also.
- I believe the scheme should be as self funding as possible by making the welfare grants into loans except in exceptional circumstances. Where possible the loans should be provided by using non transferable vouchers so that food etc must be bought with them and they cannot be used for non essentials like tobacco or alcohol. Good budgeting advice should go hand in hand so that the need for the grants is not repeated time and time again. The use of good quality second hand goods should also be promoted after thorough safety checks have been done on electrical items. This could be done in conjunction with charity projects such as British Heart Foundation etc.
- I believe there will be cases when people will require additional support in completing an application. Requests for support may flag up additional support needs of people who are vulnerable and not known to agencies. Those in greatest need may be redefined on the basis of limited money available. There is potentially a need to flag up those who require a service but are declined due to financial restrictions. In this way a clearer picture will arise as to the shortfall of financial support a council will require from central government in meeting those who require urgent financial assistance at a time the level in need is likely to increase. I feel that Council's across the country are going to perform the gate-keeping role previously undertaken by the DHS with less money.
- I would hope help would be given to signpost to other agencies. What mechanism is there to help those who do make numerous requests. How do people know who to contact when in need - many I would have thought would access the information via the website.
- It will need to reflect individual circumstances and cover the basic provisions required. It would need to be reviewed quarterly to ensure it is fit for purpose.
- none
- Payment of grants should not be made unless the claimant is able to produce evidence i.e.; a paid bill receipt or bank statement or upon written confirmation from a referring party. No more than 2 awards should be considered in 12 months. No award should be made for more than £500 for living expenses/travel/goods in 12 months. Awards should only be made to people on benefits as working people will have recourse to other methods of securing finance through banks; loans etc. Payment should only be made to the Main Benefit Claimant in any joint claim to stop "repeat" claims from either party in a couple or relationship.
- Please don't waste the money tightly control and target!
- Providing welfare grants to people in real need is very important the focus should be on keeping safe; warm and having food. Priority should be given to families and those with caring demands i.e. disabled families. I don't agree that having satellite TV or a car is being in need.
- Should be targeted as far as legally allowed to residents of the SGC area.
- Stringent measures should be in place to prevent abuse of the system
- The first cut and the questionnaire are very comprehensive. Over time it can be refined.
- The scheme should be implemented in such a way that makes it clear that it this is a last resort and look at ways to make people self sufficient. Equally; payments should be sensible; I have known grant payments for washing machines that were beyond what I could afford and had spent on my own as someone who worked hard and had saved for emergencies such as when I was made redundant
- The scheme should only be for people with a valid passport and are allowed too work in this country. The scheme should only be for people who have lived in South Gloucestershire for at least two years.
- Vouchers. Max 2 helps. Get proof as to why they need it otherwise it gets abused as crisis loans does
- We are glad it is being kept in-house at the Revenues & Benefits Service; as this will give a clear line of accountability regarding decision-making; and that we would encourage SGC to work with established agencies such as SGCAB for their outreach campaigns. Section 4.1 of the draft policy (Eligibility section) states that applicants need to be in receipt of a qualifying

benefit ?" which doesn't tally with the need to provide support to people waiting for benefit claims to be processed and for initial payments to be made; so this may need to be amended. The list of benefits at 4.1 of the draft policy document will need to be amended to make it clear that clients on the benefits that will eventually be replaced by Universal Credit and PIP (such as ESA; JSA; DLA; WTC; & CTC; and others) will also be eligible; as this scheme will be in operation in South Gloucestershire for a significant period of time before all local benefit claimants are transferred to UC and/or PIP ?" for instance existing DLA claimants are unlikely to be reassessed for PIP until 2015/2016. We would also be grateful for finer detail regarding how priority is going to be decided between vulnerable groups ?" obviously demand will be greater than the resources available which means that some kind of system will have to be in place in order to prioritize applications within groups who are eligible to apply. We are aware that Bristol City Council has devised a scoring system; whereby applicants are allocated points in three stages household make-up; priority circumstances (such as homelessness or victim of hate crime); and then additional vulnerability (such as leaving residential care or high risk of family breakdown). We would be interested to know if SGC intends to operate a similar prioritization scheme. We assume the administration scheme will be subject to scrutiny from the Local Government Ombudsman if complaints are made it therefore may not be tenable to insist that there is no right of appeal if any award is made (s7.3); as this may be seen as unreasonably fettering SGC's discretion; as it may be possible that a very small award is made that could be reasonably increased at appeal. It was also difficult to fully respond to this consultation without being formally given details of the total amount SGC will be given for this fund; how much of a cut this is when compared to the existing DWP-based scheme; and how SGC projects it will split the money available for emergency living costs awards and Community Care grant awards. We note from Social Fund data supplied through the SGC Welfare Advice Partnership that the split in 2009/10 was approximately 60% CCGs and 40% Crisis Loans. Do SGC anticipate this being the likely split for the new scheme? We would be concerned that due to the financial difficulties likely to be faced by many recipients of means-tested benefits in the coming years that there may be a need for a greater proportion of Crisis Loan equivalent payments.

- Where the council can procure the item required they should and provide the item rather than the money. Where the money is for a specific item then the council should receive vouchers or a credit note/authority to buy for that item at a particular store. Where it is for rent arrears then it should be paid directly to the landlord
- Without bias from the civil servants dealing with this. Relative poverty should be included. 68 years since the system began and it needs a modern approach. Loans are fine but crisis loans if possible should be paid by the government.